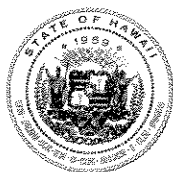


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EXECUTIVE CHAMBERS
HONOLULU

18 JTL FILE
06/14/93

Please publish
notice in
06/23/93
OEA Bulletin

JOHN WAIHEE
GOVERNOR

June 9, 1993

TO: Mr. Michael N. Scarfone, Executive Director
Hawaii Community Development Authority

THROUGH: The Honorable Mufi Hannemann, Director
Department of Business, Economic Development and Tourism

SUBJECT: Final Environmental Impact Statement for the Hale Kewalo Rental
Housing Mixed-Use Development

I am pleased to accept the final Environmental Impact Statement for the Hale Kewalo Rental Housing Mixed-Use Development as satisfactory fulfillment of the requirements of Chapter 343, Hawaii Revised Statutes. This environmental impact statement will be a useful tool in the process of deciding if the action described therein should be allowed to proceed. My acceptance of the statement is an affirmation of the adequacy of that statement under the applicable laws and does not constitute an endorsement of the proposed action.

When the decision is made regarding the proposed action itself, I expect the appropriate legislative bodies and governmental agencies to consider if the societal benefits justify the economic, social and environmental impacts which will likely occur. These impacts are adequately described in the statement, and together with the comments made by reviewers, provide useful analysis of the proposed action.

JOHN WAIHEE

c: ✓ Mr. Brian Choy

06 21 93

1993-Oahu - FEIS ORIGINAL
Hale Kewalo

FILE COPY

HALE KEWALO
RENTAL HOUSING
MIXED-USE
DEVELOPMENT

FINAL ENVIRONMENTAL IMPACT
STATEMENT

Prepared For:

Hawaii Community Development Authority
State of Hawaii

Prepared By:

Wilson Okamoto and Associates, Inc.

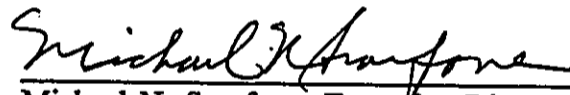
June 1993

HALE KEWALO
RENTAL HOUSING MIXED-USE DEVELOPMENT
FINAL ENVIRONMENTAL IMPACT STATEMENT
(FEIS)

This environmental document is prepared pursuant
to Chapter 343, Hawaii Revised Statutes

Prepared for: Hawaii Community Development Authority (HCDA)
State of Hawaii

Responsible
Official:


Michael N. Scarfone, Executive Director
Hawaii Community Development Authority
State of Hawaii

5/26/93
Date

Accepting
Authority: Governor John D. Waihee
State of Hawaii

Prepared by: Wilson Okamoto and Associates, Inc.
Engineers, Architects and Planners
1150 South King Street, Suite 800
Honolulu, Hawaii 96814

June 1993

HALE KEWALO
RENTAL HOUSING MIXED-USE DEVELOPMENT
FINAL ENVIRONMENTAL IMPACT STATEMENT
(FEIS)

HONOLULU, OAHU

Prepared for:
Hawaii Community Development Authority (HCDA)
State of Hawaii

Prepared by:
Wilson Okamoto and Associates, Inc.
Engineers, Architects and Planners
1150 South King Street, Suite 800
Honolulu, Hawaii 96814

June 1993

TABLE OF CONTENTS

	<u>Page</u>
Preface	i
Summary	ii
I. PROJECT DESCRIPTION	I-1
A. DEVELOPMENT PROPOSAL	I-1
B. PURPOSE AND NEED	I-1
C. PROPOSING AGENCIES	I-1
D. DEVELOPMENT COST/SCHEDULE	I-2
E. PROJECT SITE	I-2
1. Location	I-2
2. Ownership	I-2
II. PROJECT SETTING	II-1
A. REGIONAL OVERVIEW	II-1
B. PHYSICAL ENVIRONMENT	II-1
1. Climate	II-1
2. Geology/Hydrology	II-1
3. Topography	II-2
4. Flood/Tsunami Hazard	II-2
5. Soils	II-2
6. Flora/Fauna	II-2
7. Archaeological/Historical Sites	II-2
8. Scenic Characteristics	II-4
C. COMMUNITY SETTING	II-4
1. Existing Land Use	II-4
2. Surrounding Land Uses	II-6
3. Public Services	II-6
4. Schools	II-6
5. Parks	II-8
6. Public Transportation	II-8

	<u>Page</u>
D. INFRASTRUCTURE	II-8
1. Water	II-8
2. Sewer	II-8
3. Drainage	II-9
4. Electrical/Telephone	II-9
5. Gas	II-9
6. Roadway System	II-9
III. SOCIOECONOMIC CHARACTERISTICS	III-1
A. DEMOGRAPHICS	III-3
B. FAMILY CHARACTERISTICS	III-3
C. HOUSING AND HOUSEHOLDS	III-4
IV. RELATIONSHIP TO PLANS AND POLICIES	IV-1
A. HAWAII STATE PLAN	IV-1
B. STATE FUNCTIONAL PLANS	IV-3
1. Housing Functional Plan	IV-3
2. Education Functional Plan	IV-4
3. Employment Functional Plan	IV-5
C. STATE LAND USE LAW	IV-5
D. HCDA -- MAUKA AREA PLAN AND RULES	IV-5
E. FACULTY HOUSING ASSISTANCE MASTER PLAN	IV-8
V. PROBABLE IMPACTS AND MITIGATIVE MEASURES	V-1
A. SHORT-TERM IMPACTS	V-1
1. Noise	V-1
2. Vibration	V-2
3. Air Quality	V-2
4. Water Quality	V-3
5. Public Health and Safety	V-3
6. Flora/Fauna	V-3
7. Economic	V-3
8. Traffic/Parking	V-4
9. Archaeological/Historical	V-4

	<u>Page</u>
B. LONG-TERM IMPACTS - Environmental	V-5
1. Flora/Fauna	V-5
2. Flood Hazard	V-5
3. Traffic	V-5
4. Parking	V-6
5. Air Quality	V-7
6. Water Quality	V-7
7. Noise	V-7
8. Visual/Open Space	V-7
9. Archaeological/Historical	V-8
10. Infrastructure	V-8
C. LONG-TERM IMPACTS - Social	V-8
1. Population Growth and Demographics	V-8
2. Impact on Supply of Affordable Housing	V-9
3. Impact on Supply of Faculty Housing Units	V-9
4. Impact on the Neighborhood	V-10
5. Impacts on Public Services and Facilities	V-11
6. Displacement	V-13
VI. ALTERNATIVES TO THE PROPOSED ACTION	VI-1
A. "NO-ACTION" ALTERNATIVE	VI-1
B. ALTERNATIVE SITES	VI-1
C. ALTERNATIVE USES	VI-1
D. ALTERNATIVE DESIGNS	VI-1
VII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY . . .	VII-1
A. SHORT-TERM USES	VII-1
B. LONG-TERM PRODUCTIVITY	VII-1
VIII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES	VIII-1
A. LONG-TERM COMMITMENT OF LAND	VIII-1

	<u>Page</u>
B. CONSTRUCTION COMMITMENTS	VIII-1
C. OPERATIONAL COMMITMENTS	VIII-1
IX. PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED	 IX-1
X. CONSULTATION	X-1

PREPARERS OF THE EIS

REFERENCES

APPENDICES

- A. FLOOD STUDY
 - B. ARCHAEOLOGY STUDY
 - C. TRAFFIC STUDY
 - D. ACOUSTIC/VIBRATION STUDY
 - E. SOCIAL IMPACT STUDY
-

LIST OF FIGURES

<u>Figure Number</u>		<u>Page</u>
I	LOCATION MAP	I-3
II	PROPOSED DEVELOPMENT SITE PLAN	I-4
III	ELEVATION VIEWS	I-5, I-6
IV	FIRM	II-3
V	NATIONAL AND STATE HISTORIC REGISTER SITE	II-5
VI	VICINITY MAP	II-7
VII	ROADWAY SYSTEM	II-11
VIII	PHOTOGRAPHS OF THE PROJECT AREA	II-12, II-13
IX	SOCIAL IMPACT ASSESSMENT SUB-AREAS OF KAKAAKO	III-2
X	KAKAAKO MAUKA AREA LAND USES MAP	IV-6

PREFACE

This Final Environmental Impact Statement (FEIS) has been prepared pursuant to Chapter 343, Hawaii Revised Statutes, and Title 11, Chapter 200, Administrative Rules, Department of Health, State of Hawaii. The proposed project is an agency action by the Hawaii Community Development Authority (HCDA) in cooperation with the Housing Finance and Development Corporation (HFDC) and the University of Hawaii (UH).

A previous document, Hale Kewalo Rental Housing Mixed-Use Development Final Environmental Assessment/Negative Declaration, was filed with the Office of Environmental Quality Control (OEQC) on November 8, 1992. That document was withdrawn in favor of a revised determination that an Environmental Impact Statement (EIS) would be processed for the project and an EIS Preparation Notice for this project was published in the OEQC Bulletin on January 23, 1993. The Draft EIS was subsequently filed with the OEQC and notice of its availability for public review was published in the OEQC Bulletin on April 8, 1993. The deadline for comments in the public review period was May 23, 1993. This document has been filed with the OEQC for acceptance by the Governor, State of Hawaii.

SUMMARY

HALE KEWALO
RENTAL HOUSING MIXED-USE DEVELOPMENT

Proposing Agencies: Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
Contact: Eric J. Masutomi, Director of Planning

Housing Finance and Development Corporation
State of Hawaii

University of Hawaii
State of Hawaii

Final EIS Preparer: Wilson Okamoto and Associates, Inc.
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Contact: Earl K. Matsukawa, Project Manager

Accepting Authority: Governor John D. Waihee
State of Hawaii

Tax Map Key: 2-3-09: por.1

Area: 232,000 square feet

Location: Pensacola Street and Kapiolani Boulevard in the Mauka Area
of the Kakaako Community Development District

Ownership: State of Hawaii

Existing Uses: Employment Training Office (ETO) of the University of
Hawaii

Proposed Action: Construction of two residential towers containing a total of
530 affordable rental units for general public and U.H.

faculty use, a parking structure, a job training facility, and park/open space.

Impacts:

Short-term impacts during construction include noise, particularly during pile-driving, and periodic traffic and parking inconveniences. Noise during pile driving may exceed the Department of Education criterion for construction noise at McKinley High School.

Short-term economic benefits will include the creation of construction-related jobs and increased business for local material suppliers and, secondarily, to retail businesses through a multiplier effect from increased construction activity.

In the long-term, existing uses will be displaced in favor of more intensified use of the site with inherent marginal increases in associated traffic, noise and vehicular emissions.

Intended long-term community benefits will be accrued through the provision of affordable housing while higher education will be served by providing affordable housing as a faculty recruitment incentive. Also, much of the existing Education Training Office (ETO) functions will be accommodated. Public education will be served by providing an existing building and associated parking for use by the State Department of Education (DOE). Public recreational opportunity will be increased by creating a new 1.75 acre park/open space along Kapiolani Boulevard.

Intensified use of the site will result in marginal increases in traffic and associated vehicular emissions and noise. The project will contribute to the increasingly high-rise character of the area although identified view corridors and vistas will be protected. The demand for public services, including police and fire protection and recreation, will increase marginally with the increase in population associated with the project. The projected increase in school age children will affect public schools serving the

project and needs to be addressed in the context of projected education demands in the schools' respective service area and DOE plans for accommodating those demands.

Mitigation Measures:

To address noise impacts of construction on McKinley High School, it is intended that pile driving be conducted while school is not in session, although this may not be entirely possible.

To address the concerns of construction impacts on potential archaeological resources on the project site, test excavations will follow demolition of existing structures. Findings and any necessary follow-up investigations will be coordinated with the State Historic Preservation Division.

To address concerns that vibration during pile driving will affect nearby structure, seismographic monitoring will be conducted during test pile driving to determine appropriate equipment, methods and materials to be used.

To address concerns that existing noise generated at the school may cause residents in the project to complain and result in restrictions of school activities, a noise disclosure provision will be included in all rental agreements. Also, the units will be designed to accommodate air conditioners which tenants may install to allow them to close their windows and thereby attenuate exterior noise.

**Alternatives
Considered:**

In the "no action" alternative, control over the project site will revert to the University of Hawaii which intends to develop faculty housing and return ETO functions.

Alternative sites for non-faculty affordable housing may be available, however, the need for such housing in the urban core is critical and should be addressed wherever an appropriate site is available. The project site offers the unique opportunity to accommodate a mix of uses addressing a range of community needs, including

affordable housing, higher education, education and recreation.

Unresolved Issues:

Further investigation of potential archaeological resources after demolition of existing structures will need to be conducted to determine if such resources are present and how they may be affected. This investigation will be coordinated with the State Historic Preservation Division. Seismographic monitoring during test pile driving will be conducted to determine the appropriate equipment, methods and materials to be used to mitigate vibration impacts on nearby structures.

Relatively minor discrepancies between the HCDA and the Department of Education regarding student enrollment projections for the Hale Kewalo development have yet to be fully resolved. Discussions between the two agencies are ongoing.

**Compatibility with
Land Use Plans/Policies:**

The proposed project will comply with the HCDA's Mauka Area Plan and Rules.

Required Permits:

HCDA Planned Development Permit, State Department of Health Noise Permit, City and County Grading and Trenching Permit, City and County Building Permit, and National Pollution Discharge Elimination System Permit (if necessary).

**Parties Consulted
on Draft EIS:**

Federal Agencies

US Environmental Protection Agency, Pacific Region
Army Directorate of Facilities Engineer
Pearl Harbor Naval Base
Soil Conservation Service
US Army Corps of Engineers
US Coast Guard
US Fish and Wildlife Service
US Geological Survey

State Agencies

Department of Agriculture
Department of Accounting and General Services
Department of Business, Economic Development & Tourism
(DBEDT)
DBEDT Library
Department of Defense
Department of Education
Department of Health
Department of Land and Natural Resources (DLNR)
DLNR State Historic Preservation Division
Department of Transportation
Office of Environmental Quality Control
Office of State Planning
State Archives
University of Hawaii Environmental Center
University of Hawaii Operations and Finance
University of Hawaii Water Resources Research Center

City and County of Honolulu

Board of Water Supply
Building Department
Department of Housing and Community Development
Department of Land Utilization
Department of Parks and Recreation
Department of Public Works
Department of Transportation Services
Fire Department
Municipal Reference and Records Center
Police Department
Planning Department

Others

Honolulu Star Bulletin
Honolulu Advertiser
Sun Press
American Lung Association
Hawaiian Electric Company
Office of Hawaiian Affairs
University of Hawaii, Hamilton Library

Legislative Reference Bureau
State Main Library
Kaimuki Regional Library
Kaneohe Regional Library
Pearl City Regional Library
Hilo Regional Library
Wailuku Regional Library
Kauai Regional Library
Neighborhood Board Nos. 10 and 11
Representative Cynthia Thielen
Teachers at McKinley High School (MHS)
Young Parents Program (MHS)
Mr. Paul Kadooka, et al.
Ms. Vanessa Lee (MHS Student Council)
Ms. Gaile A. Sykes
Ms. Amy Kimura

I. PROJECT DESCRIPTION

A. Development Proposal

The Hawaii Community Development Authority (HCDA) in cooperation with the Housing Finance and Development Corporation (HFDC) and the University of Hawaii (UH) is proposing the joint development of a rental housing project with parking structure, employment training facility and park/open space. Two concrete towers adjacent to a 5-level parking platform will comprise approximately 29 floors of general housing in one tower and approximately 26 floors of faculty housing for the University of Hawaii in the other tower. Approximately 21,000 square feet of floor area on two levels adjacent to the faculty tower's base will be allocated to the Employment Training Office (ETO), a job training program presently located on the project site. An approximately 1.75-acre open space/community park will be provided along Kapiolani Boulevard.

An existing two-story building which temporarily housed the Hawaii State Library until May 1992 will remain intact. This building, which is labeled as Building 857, will be dedicated to the Department of Education (DOE) for educational purposes. All other existing facilities, including wooden portable classroom structures, low-rise concrete buildings, and asphalt parking lots, will be demolished.

B. Purpose and Need

The proposed rental housing mixed-use project addresses multiple housing, education, and recreation needs. The community's acute need for housing is addressed by providing a total of approximately 530 rental apartments to a broad section of income ranges. The project also addresses UH's need to recruit and retain top-notch faculty by designating one tower of housing for UH faculty. Toward addressing other educational needs, the project 1) includes the new ETO facility, which will provide the program with ample functional space, and, 2) preserves Building 857 on the site for educational use. Community recreation need is addressed through the creation of approximately 1.75 acres of park/open space along Kapiolani Boulevard.

C. Proposing Agencies

The proposing agency is the Hawaii Community Development Authority (HCDA), jointly with the Housing Finance & Development Corporation (HFDC) and the University of Hawaii (UH). HFDC, the developer of both towers, will be a leasehold owner of the project under a lease to be issued by the University of Hawaii.

D. Development Cost/Schedule

The development cost, including land acquisition, demolition, design and construction of the high-rise structure is estimated at \$90.0 million. The major source of funding will be bond financing from the HFDC Rental Housing System. Allocations from the State of Hawaii Capital Improvement Program will also be utilized. Construction is expected to commence in 1993 with substantial completion in about 17 months.

E. Project Site

1. Location

As shown on Figure I, the project site is located within the Kakaako Community Development District, on the north-west corner of Pensacola Street and Kapiolani Boulevard. The proposed project is located in the Kakaako district of Honolulu and will occupy 232,000 square feet of land identified as Tax Map Key 2-3-09: por.1.

2. Ownership

Land ownership is held by the State of Hawaii, Department of Land and Natural Resources (DLNR). The area is the former site of the Pensacola Campus of Kapiolani Community College (KCC). Control of the site was conveyed to the Hawaii Community Development Authority on August 31, 1992, by Executive Order No. 8567, pursuant to Chapter 206-E8, Hawaii Revised Statutes.

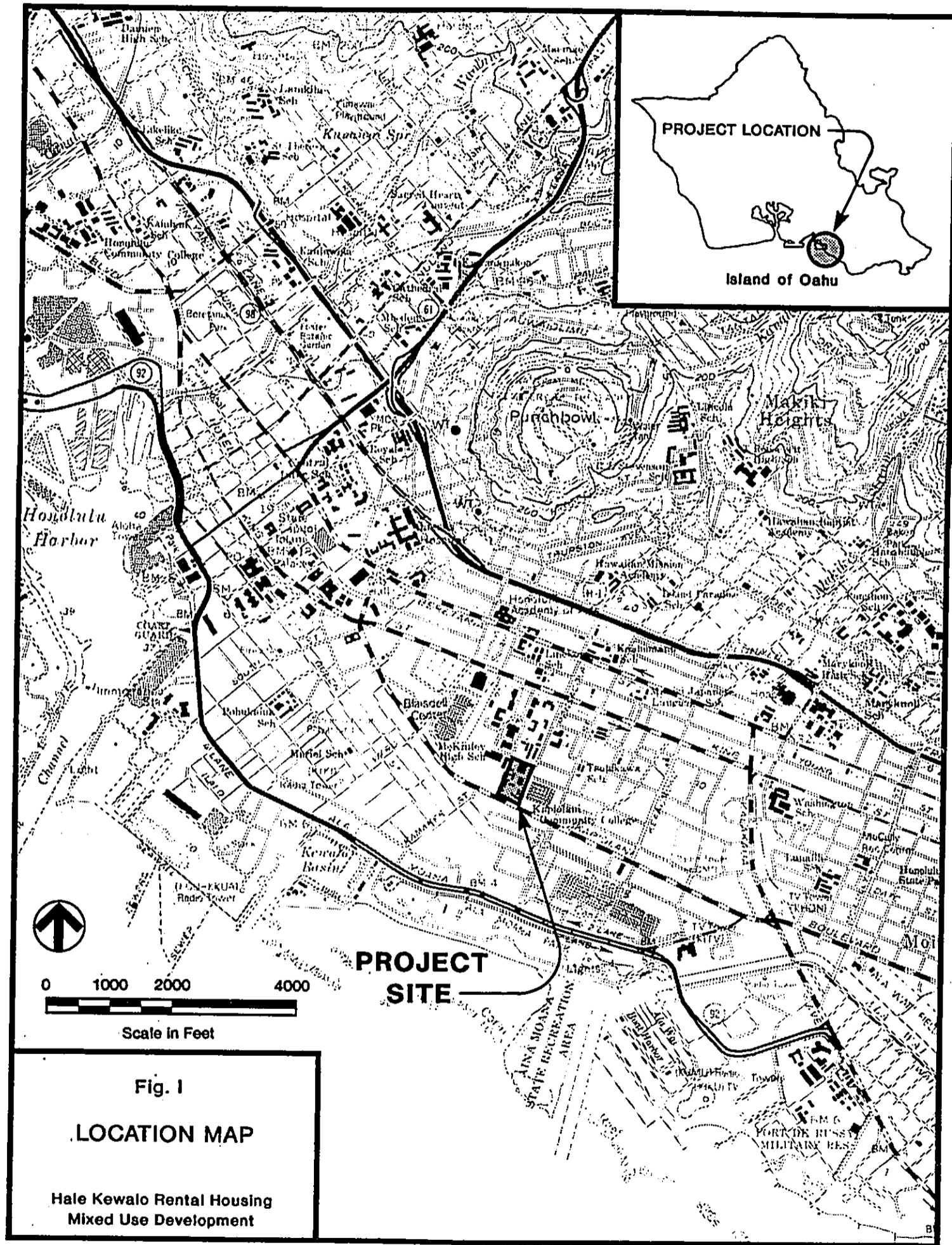


Fig. 1
LOCATION MAP
 Hale Kewalo Rental Housing
 Mixed Use Development

School

Five-Level Parking Structure

UH Faculty
Tower

Building 857
Department of Education

ing Opportunity
ram

Parking Lot

McKinley High School

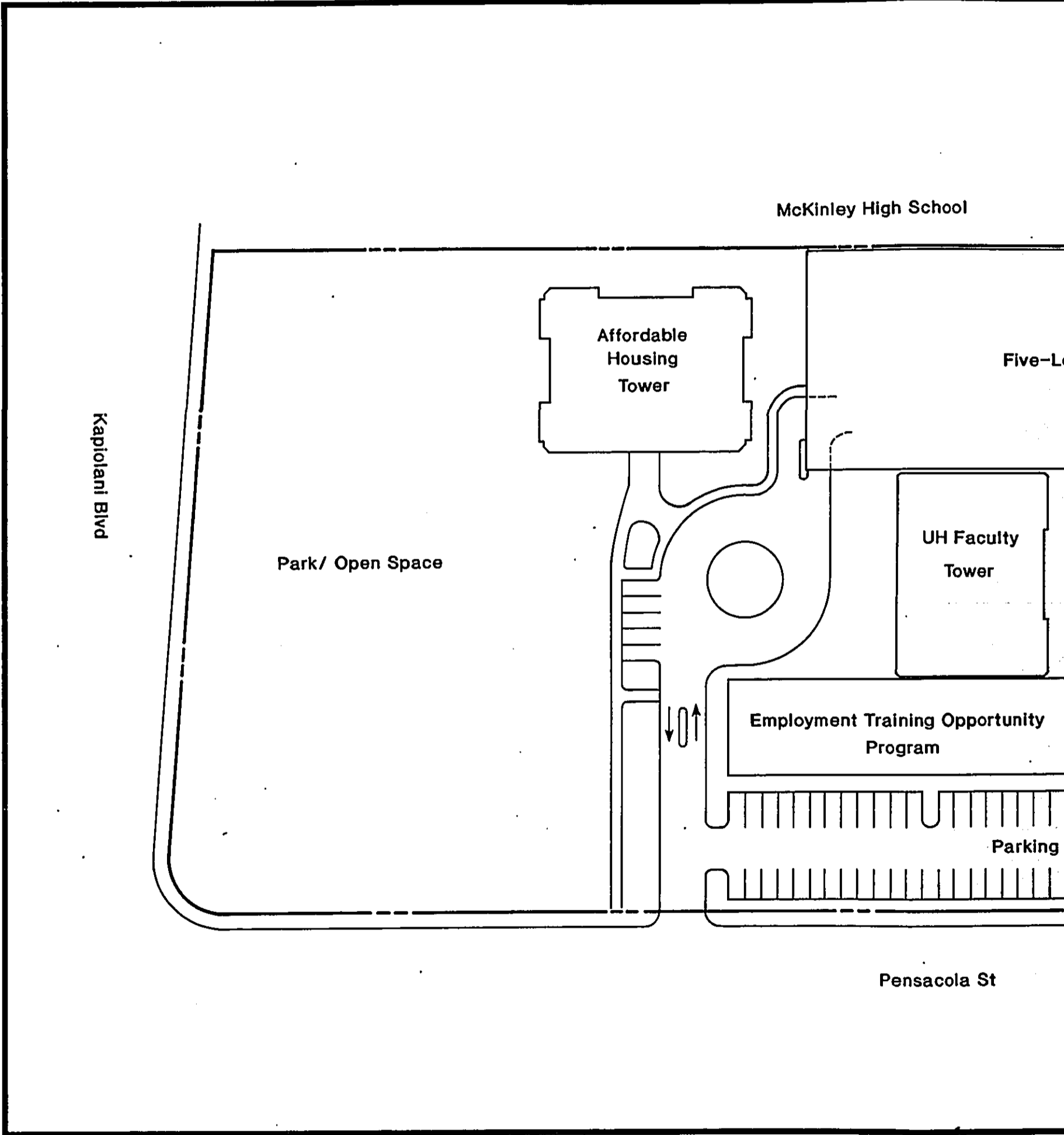


Scale: 1" = 60'

nsacola St

Fig. II
PROPOSED
DEVELOPMENT
SITE PLAN

Hale Kewalo Rental Housing
Mixed Use Development



McKinley High School

Five-L

Affordable
Housing
Tower

Kapiolani Blvd

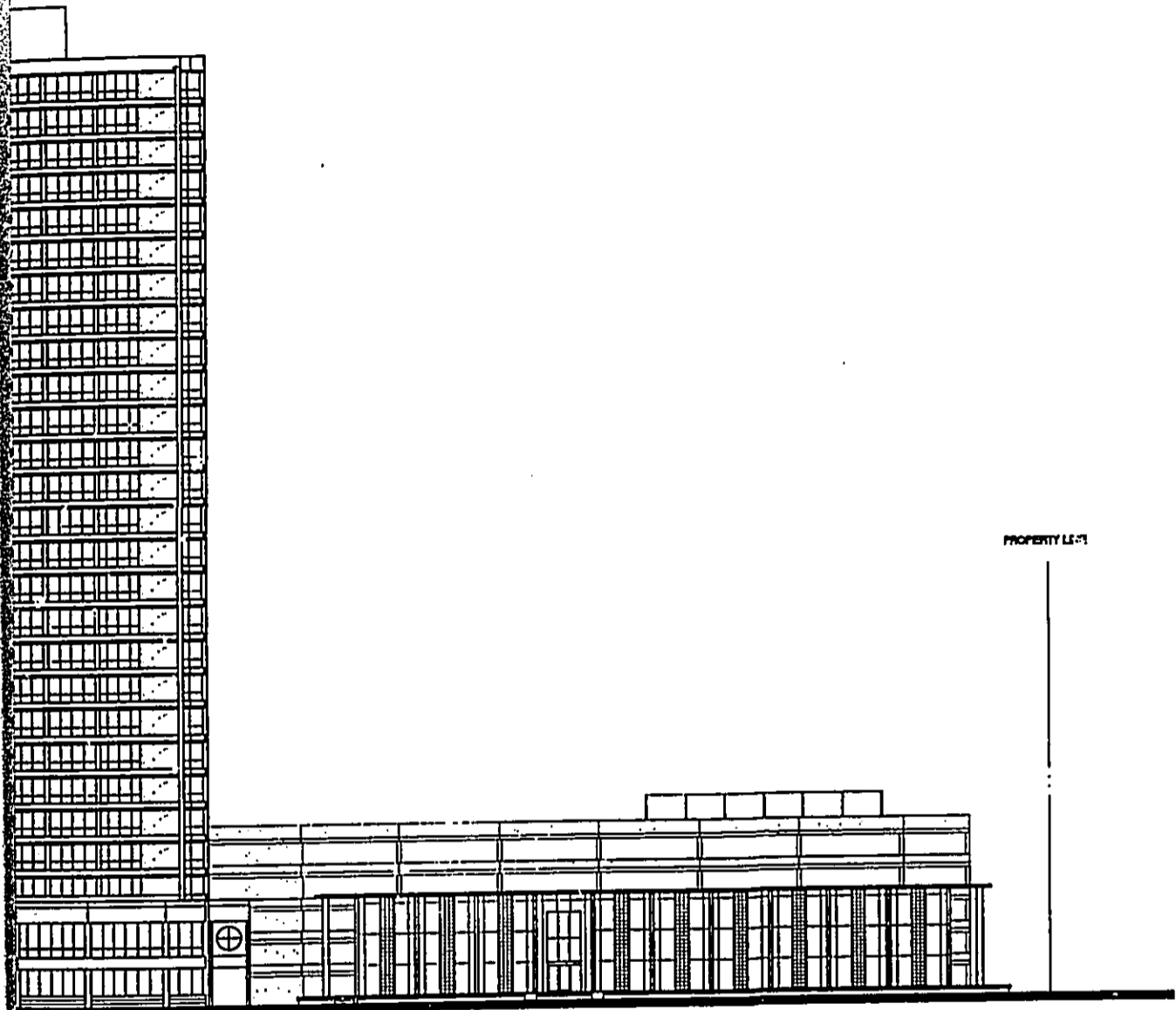
Park/ Open Space

UH Faculty
Tower

Employment Training Opportunity
Program

Parking

Pensacola St



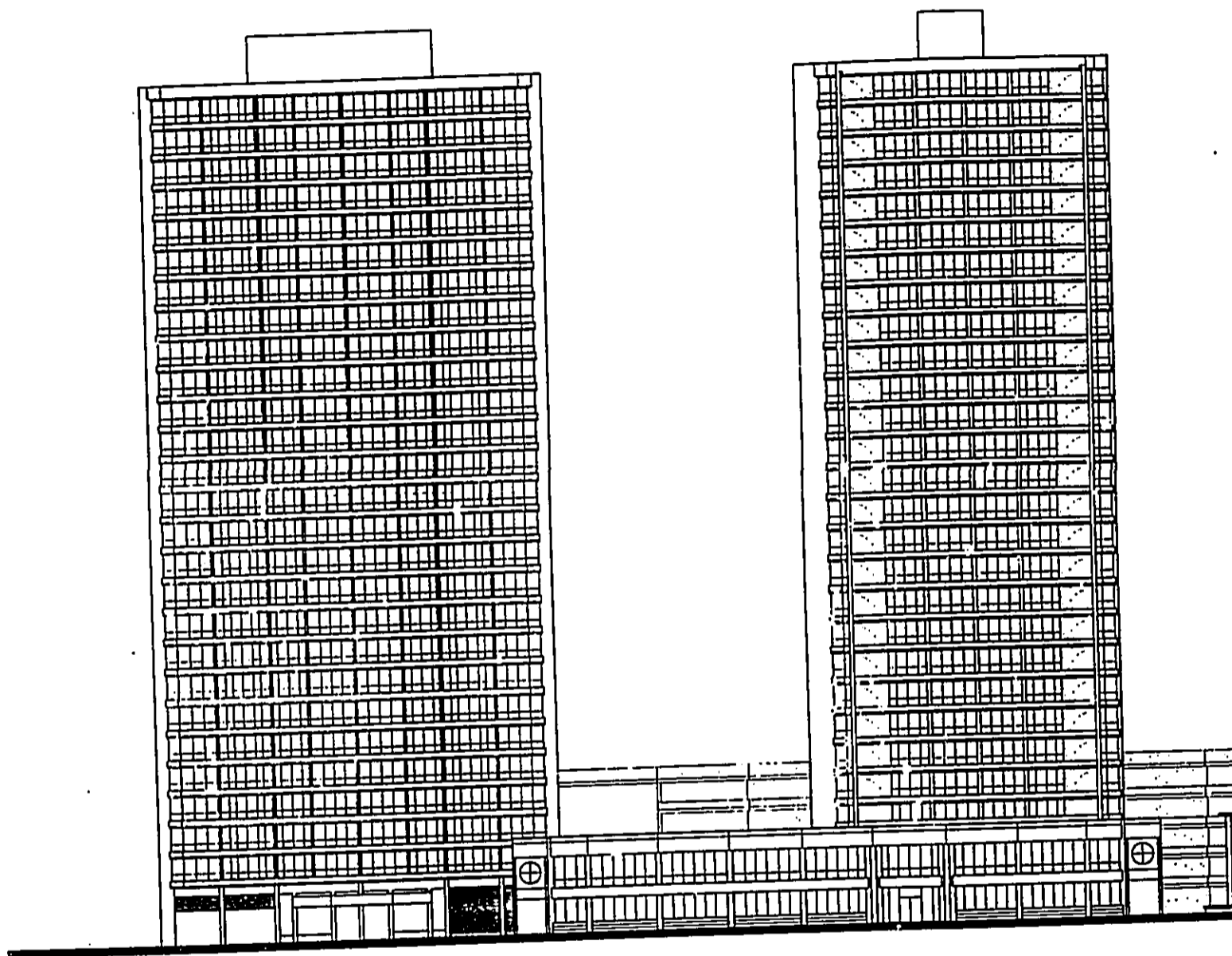
MULTI TOWER

EXISTING BUILDING 857

McKINLEY HIGH SCHOOL

Fig. III
**PENSACOLA STREET
ELEVATION**
Hale Kewalo Rental Housing
Mixed Use Development

INC. • WALTER LEONG & ASSOCIATES, INC.



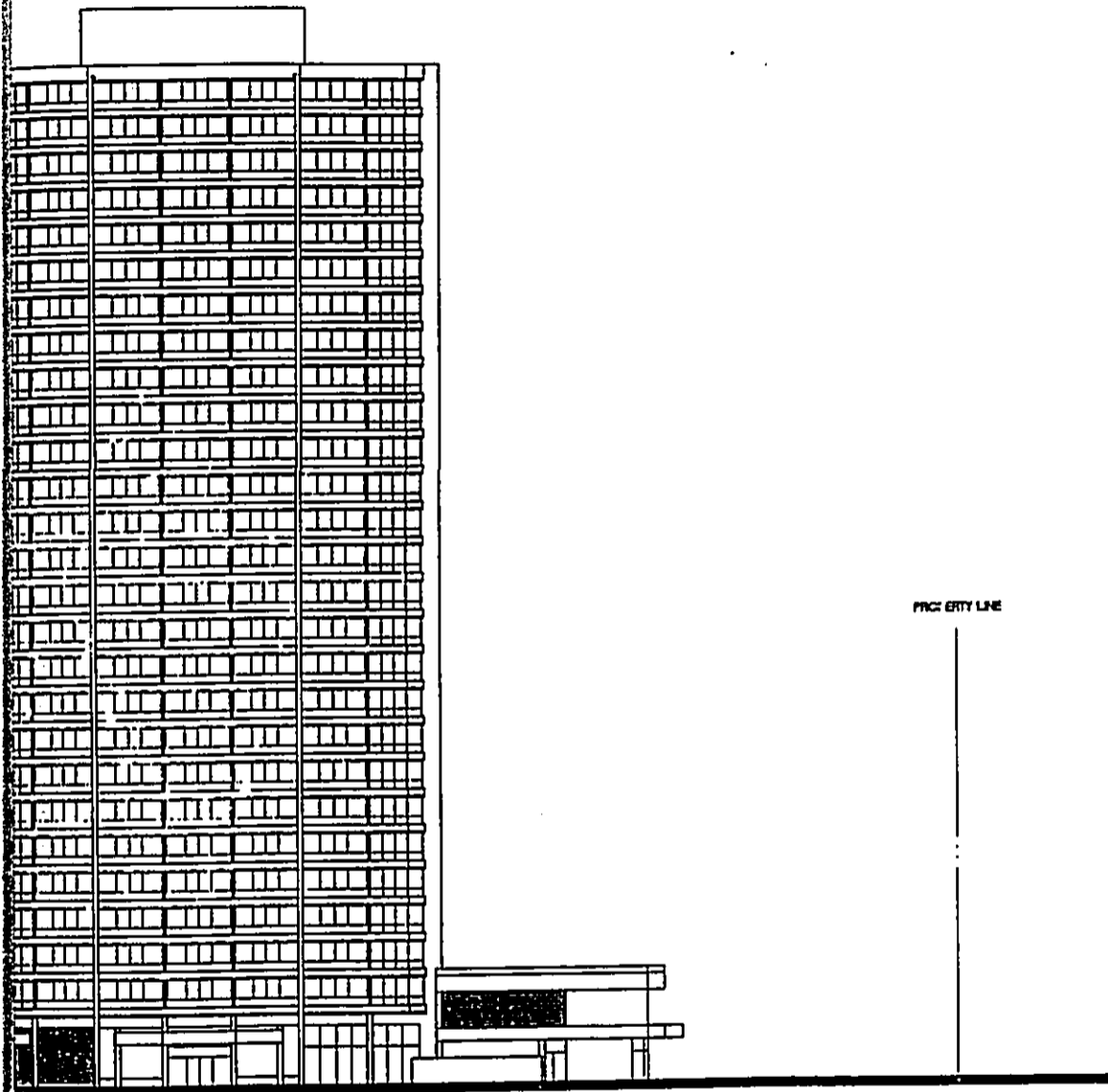
KAPIOLANI BLVD

AFFORDABLE HOUSING
TOWER

ACCESS ROAD E.T.O.

UH FACULTY TOWER

Source: ANBE, ARUGA & ISHIZU, ARCHITECTS, INC. • WALTER LEONG & ASS



UH FACULTY TOWER

E.T.O.

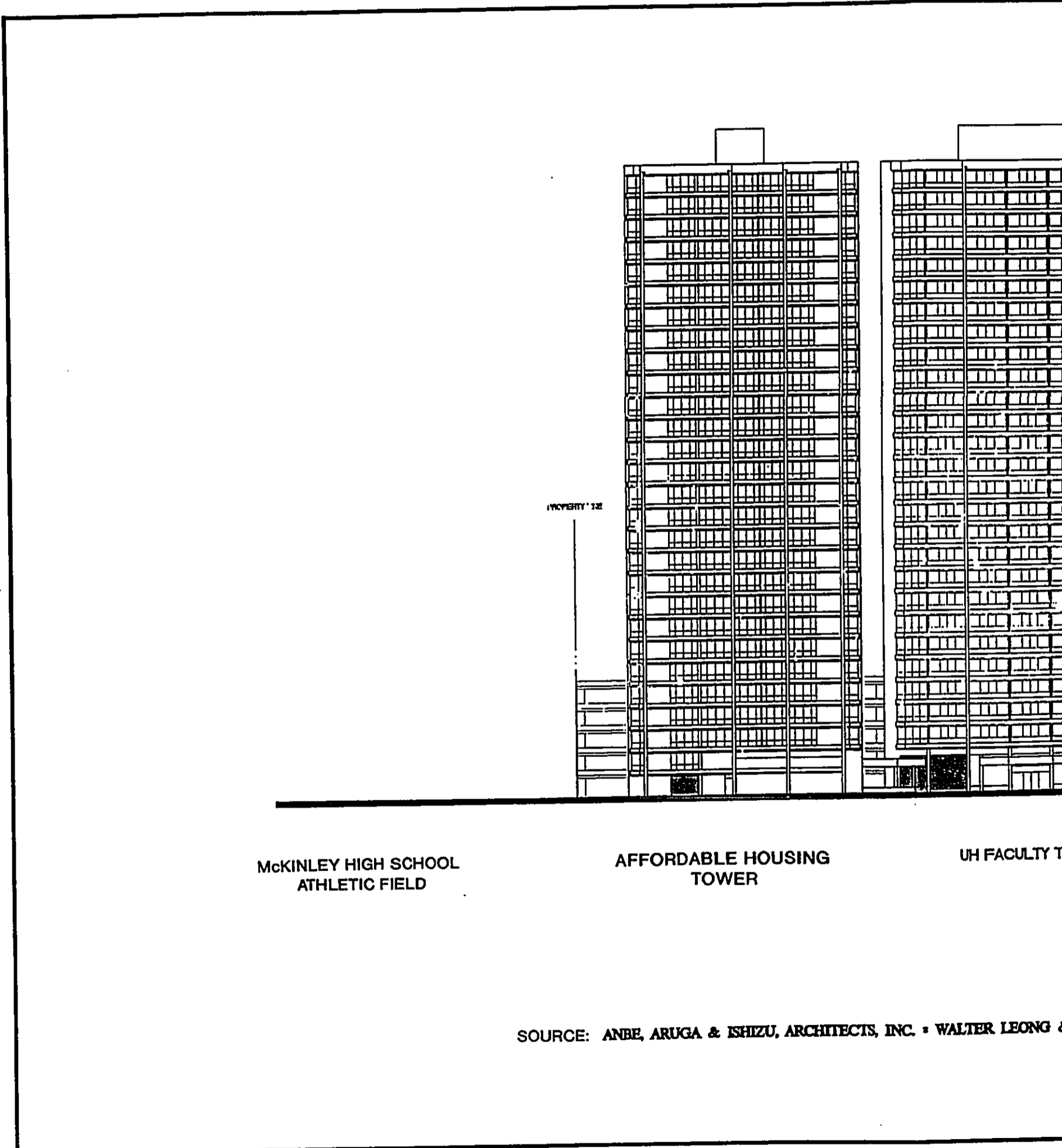
PARKING LOT

PENSACOLA STREET

• WALTER LEONG & ASSOCIATES, INC.

Fig. III
KAPIOLANI BLVD
ELEVATION

Hale Kewalo Rental Housing
Mixed Use Development



McKINLEY HIGH SCHOOL
ATHLETIC FIELD

AFFORDABLE HOUSING
TOWER

UH FACULTY T

SOURCE: ANBE, ARUGA & ISHIZU, ARCHITECTS, INC. • WALTER LEONG &

II. PROJECT SETTING

A. Regional Overview

Oahu is the third largest island in the State of Hawaii. Its 593 square miles of land comprise 9.4 percent of the State's total area. It is the most populous of all the islands, with about 80 percent of the State's population. The Hawaii state capital is located in Honolulu, Hawaii.

The project site is situated in the Mauka Area of the Kakaako Community Development District just east of Downtown Honolulu. The Kakaako District, which is under the jurisdiction of the Hawaii Community Development authority, consists of approximately 583 acres of mixed light industrial, residential and business uses.

B. Physical Environment

1. Climate

The Hawaiian Islands lie in the northern fringe of the Tropic of Cancer, placing them within the belt of northeasterly trade winds which persist for the major part of the year. On Oahu, trade winds are prevalent for 90 percent of the time between May and October. From November to April, Hawaii's winter season, the "trades" drop in frequency to about 50 percent. The "winter" season brings intense precipitation that accounts for practically all of the rain that falls on the leeward plains.

The climate in the area of the project site is typical of the leeward coastal lowlands of Oahu. This climate is characterized by long sun exposure; varying temperatures of 70-90 degrees Fahrenheit; and persistent northeasterly trade winds, ranging from 8 to 18 mph. Approximately 30 inches of annual rainfall can be expected between the months of November and March.

2. Geology/Hydrology

The project site's geologic substrata are composed of coral reefs and sedimentary deposits formed during a time of relatively great fluctuations in sea level. The area is generally underlain by a coral layer which slopes downward from about 5 feet mean sea level (MSL) near King Street to 25 feet below MSL along Ala Moana Boulevard.

3. Topography

The topography of the site is relatively level ranging in elevation from 4 to 6 feet above MSL.

4. Flood/Tsunami Hazard

The project area is classified as Zone A on the Flood Insurance Rate Map (FIRM) as indicated on Figure IV. This classification means that the site is in a special flood hazard area inundated by 100-year flood although no base flood elevations were determined for the site. Therefore, estimates of flood elevation were prepared by Edward K. Noda and Associates, Inc. in conjunction with the proposed project. The complete study is included as Appendix A. The derived flood elevation estimate for the project site and vicinity is 5.8 feet above MSL.

5. Soils

According to the US Soil Conservation Service, the soil on the project site is classified as Fill land, mixed (FL). This soil type consists of material dredged from the ocean or hauled from nearby areas.

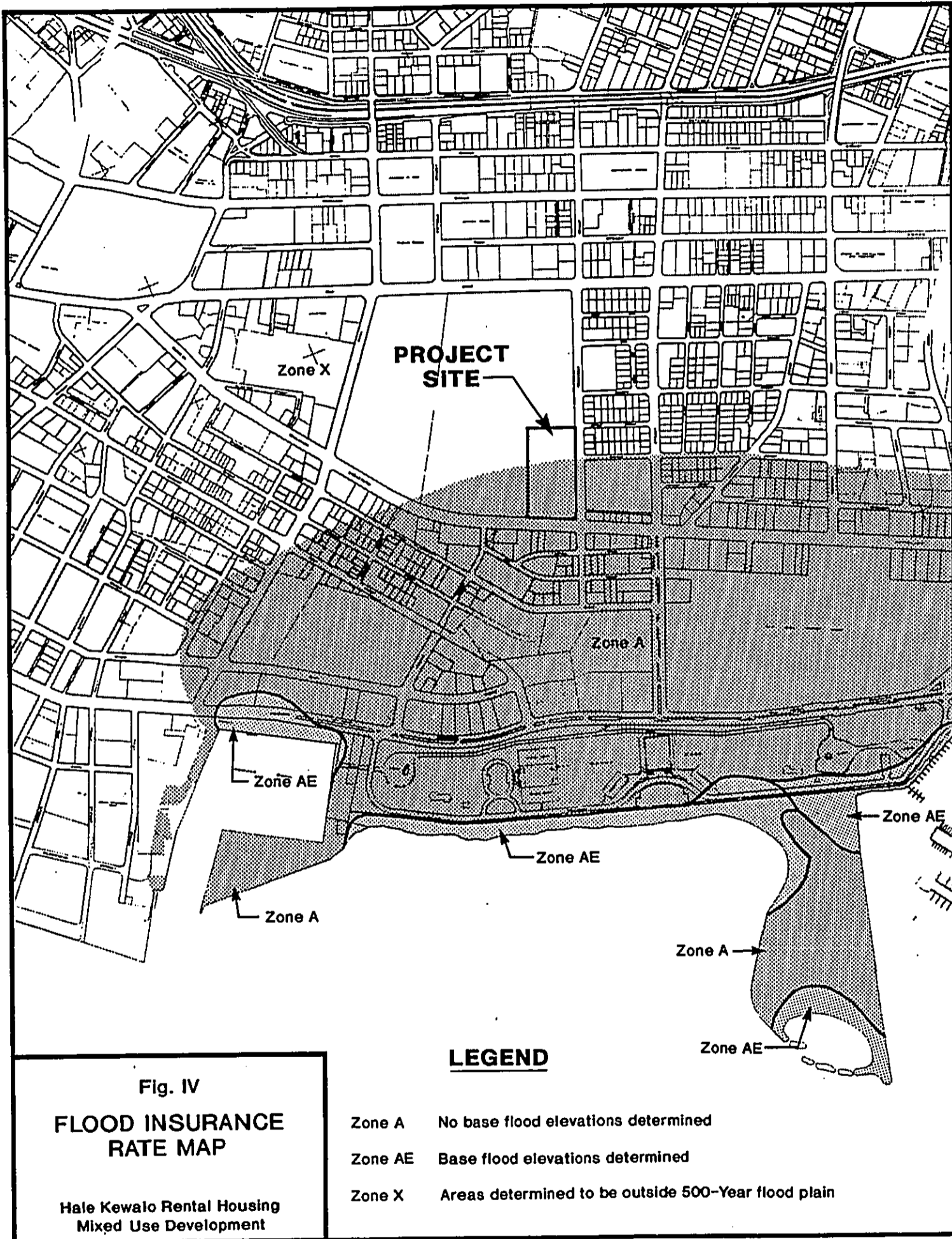
6. Flora/Fauna

The project site is located in a redeveloping urban environment with no significant naturally occurring vegetation. Landscaping accounts for most vegetation in the area, including grass and shrubbery. Large monkeypod trees line Kapiolani Boulevard and Pensacola Street.

Fauna is limited to birds and mammals which have adapted to the urban environment. Birds such as sparrows and doves are common to the site, while mice, rats, and domestic and feral cats are probably present.

7. Archaeological/Historical Sites

An archaeological study prepared by Cultural Surveys Hawaii in April 1992, and included here as Appendix B, reports that previous and current archaeological studies within the nearby Kakaako area have documented little of significance except the presence of human burials of pre-contact and post-contact origin. Such burials have been found outside of the project site at South, Punchbowl, and



Halekauwila Streets. No known archaeological or historical sites are located in the project site.

In proximity of the project site, six buildings on the McKinley High School campus are listed on the National and State Registers of Historic Places. These buildings include the auditorium/administration building and five classroom buildings as indicated on Figure V. Other features included within the historic site are the central quadrangle, its flagpole and statue of President William McKinley flanked by monkeypod trees, and the oval drive at the head of the quadrangle with the lawn which is bordered by seventeen Chinese banyan trees.

8. Scenic Characteristics

Views from the site include: the central business district skyline in the Ewa direction; low-rise buildings in the Diamond Head direction; and the Koolau Mountain Range in the mauka direction. In the makai direction, the view includes low- and high-rise buildings along Kapiolani Boulevard with Nauru Tower rising most prominently behind them.

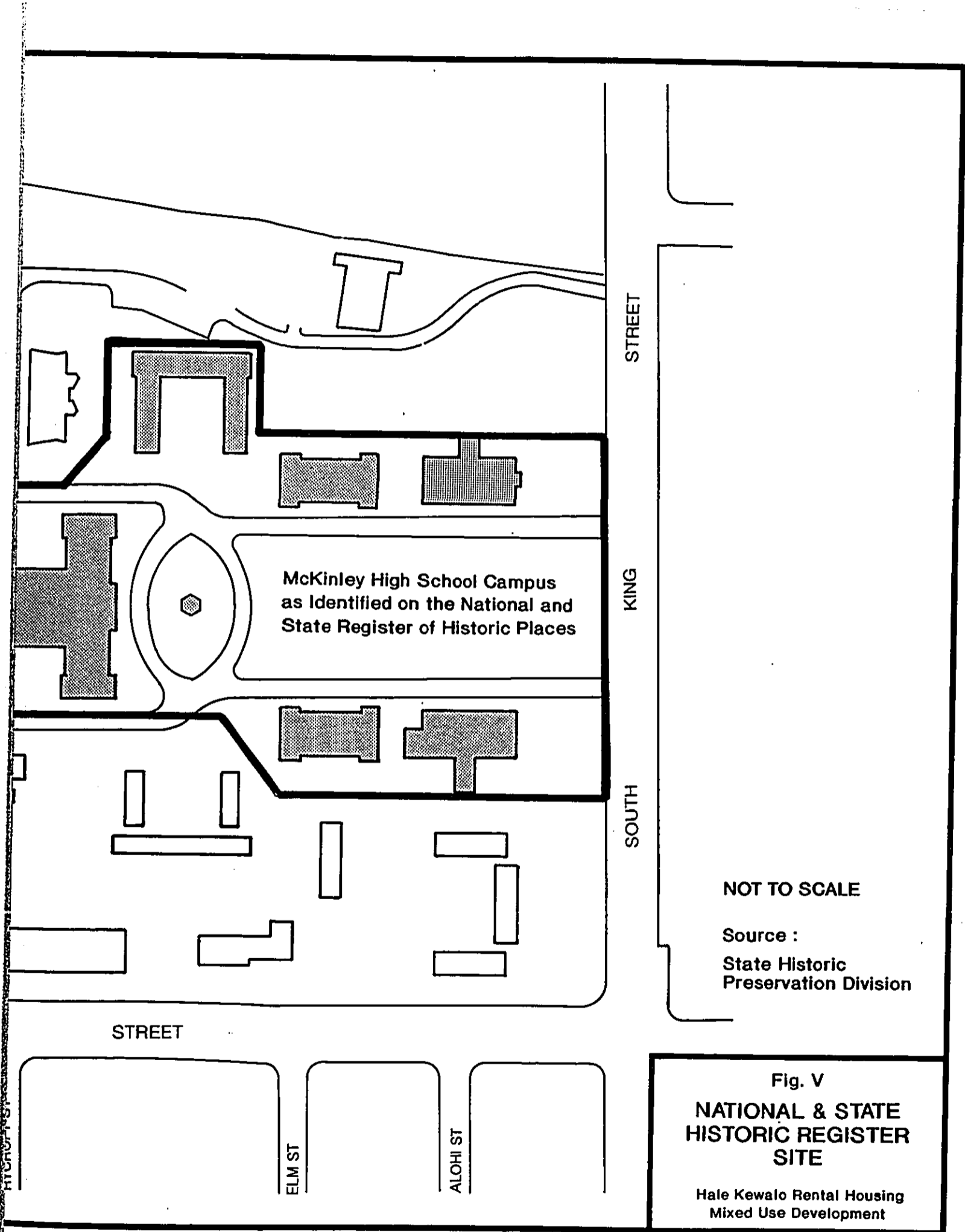
View corridors have been designated along Pensacola Street and Kapiolani Boulevard by the HCDA. Building setback requirements in the HCDA's Mauka Area Rules protect these view corridors. Another important scenic vista is the front view of the McKinley High School campus, looking toward the historic buildings from King Street.

C. Community Setting

1. Existing Land Use

The major occupant of the site is the University of Hawaii's Employment Training Office (ETO) which provides job training/placement services to young adults. The ETO's offices include a Job Skills Center, Job Search Center, Food Services Education, Office Technology Annex, Construction Occupations and Trades, Information Processing, Admissions and Records Counselors, Student Services, and Single-Parent Advocate Counselors.

Non-ETO functions include Operation Nightingale (a Registered Nurse training program managed by the Department of Health) and the Physical Planning Division of the Community College System.



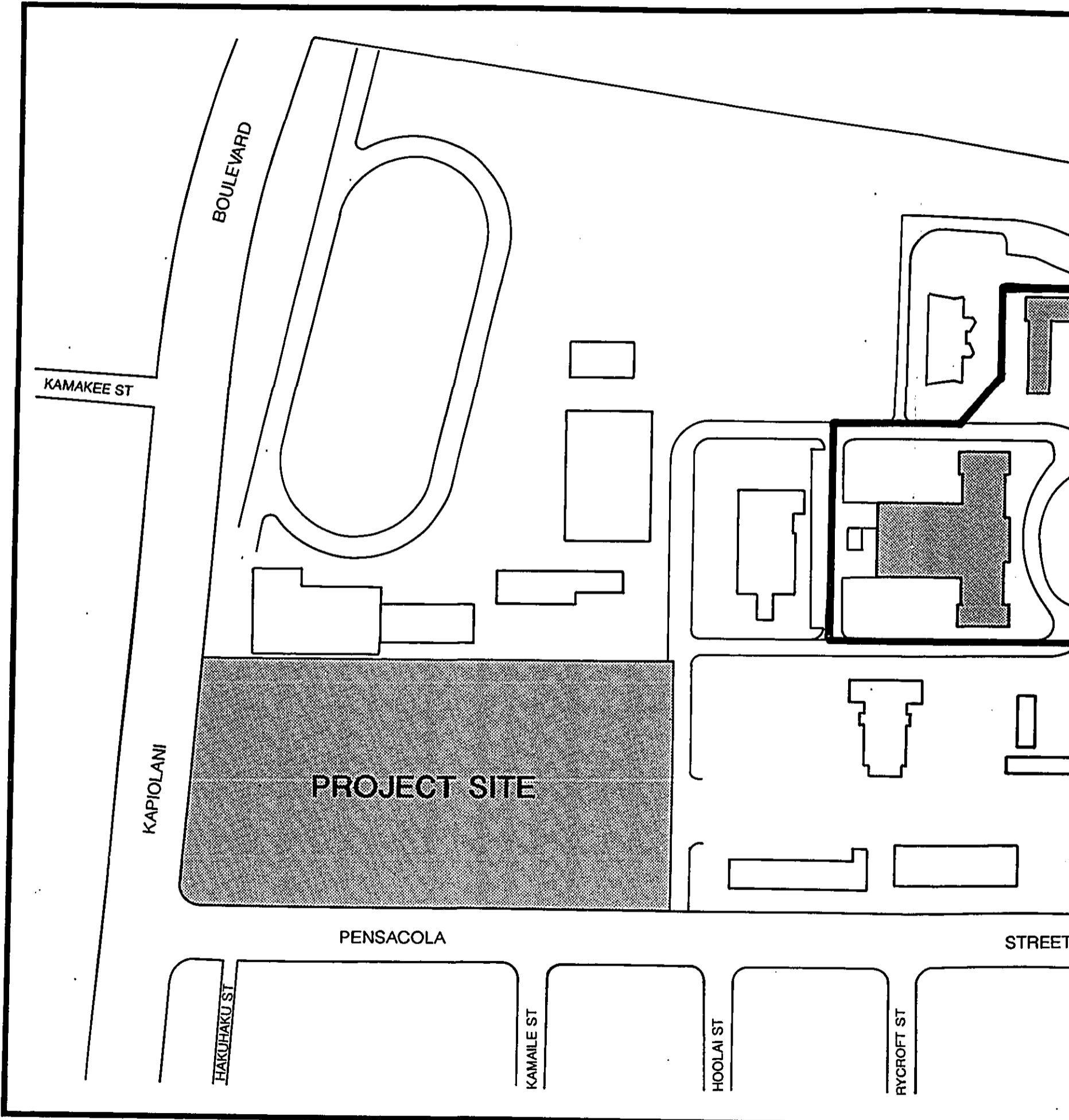
McKinley High School Campus
as Identified on the National and
State Register of Historic Places

NOT TO SCALE

Source :
State Historic
Preservation Division

Fig. V
NATIONAL & STATE
HISTORIC REGISTER
SITE

Hale Kewalo Rental Housing
Mixed Use Development



BOULEVARD

KAMAKEE ST

KAPIOLANI

PROJECT SITE

PENSACOLA

STREET

HAKUHAKU ST

KAMAILE ST

HOOLAI ST

RYCROFT ST

2. Surrounding Land Uses

As shown in Figure VI, land uses directly Ewa and mauka of the project site consist of McKinley High School and its athletic field. In the Diamond Head and makai directions, the project site is bordered by two multi-lane thoroughfares, Pensacola Street and Kapiolani Boulevard, respectively.

Mauka-Diamond Head of the project site, across Pensacola Street, are primarily multi-family residential structures. In the Diamond Head direction is an abandoned building presently planned for demolition and subsequent development of a mixed-use residential, commercial, and retail complex. Across Kapiolani Boulevard in the makai direction are numerous low- and high-rise commercial and retail operations. Across the athletic field of McKinley High School in the Ewa direction is the Neal Blaisdell Center Complex.

3. Public Services

The project area is located within the Honolulu Metropolitan Police District which extends from Hawaii Kai to Pearl City. District I Headquarters has recently moved into its new facility at Alapai Street between Beretania and King Streets where the former bus depot was located.

Major medical facilities located near the project site are the Honolulu Clinic of Kaiser Permanente at the corner of Pensacola and King Street, and Straub Clinic and Hospital, Inc. at King Street and Ward Avenue. Both facilities are located within a half-mile radius of the project site. Emergency services are available at both medical facilities.

Fire protection service for the project site is provided by the Kakaako Fire Station, located at 555 Queen Street, near its intersection with South Street.

4. Schools

Primary and secondary public schools which serve the project site are Kaahumanu Elementary School, Central Intermediate School, and McKinley High School. Kaahumanu Elementary is located on Beretania Street between Piikoi and Pensacola Streets. Central Intermediate is located on Vineyard Boulevard between Queen Emma Street and Pali Highway. McKinley High School is on the corner of King and Pensacola Streets, mauka on the block of the project site.

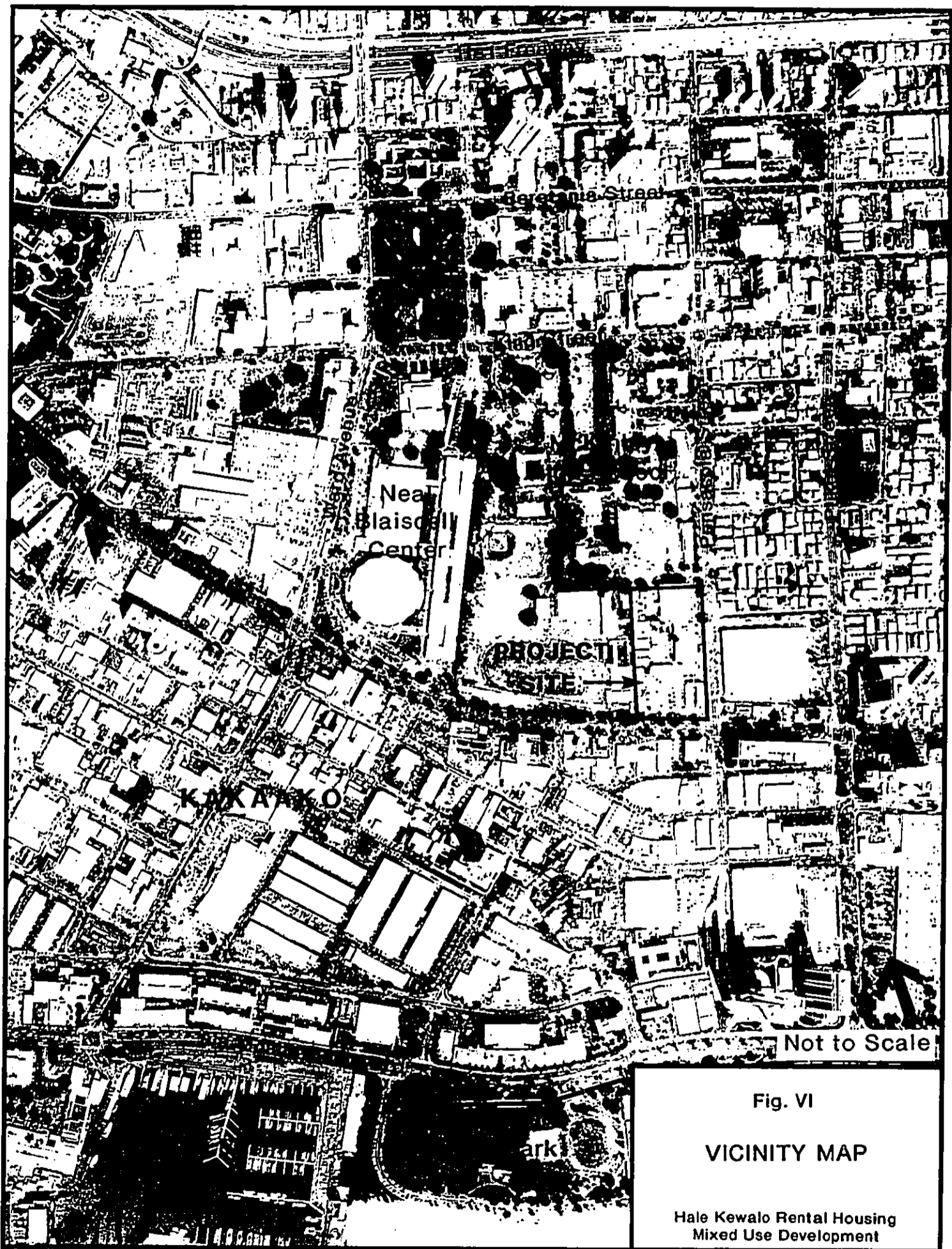


Fig. VI

VICINITY MAP

Hale Kewalo Rental Housing
Mixed Use Development

5. Parks

Parks in the vicinity of the project site include Ala Moana Park (76 acres), Kakaako Waterfront Park (30 acres), Sheridan Park (1.7 acres), and Mother Waldron Playground (1.8 acres).

6. Public Transportation

Bus service is provided by MTL, Inc. (TheBus), an islandwide municipal bus system. The project site lies on a major transit-line between the Central Business District and the Ala Moana Shopping Center which are major nodes of inter-route transfer. TheBus routes 3, 9, 11, 12, and 50-54 run in both directions along Kapiolani Boulevard, while routes 17 and 18 run down one-way Pensacola Street.

D. Infrastructure

1. Water

The water system serving the project area is part of the Honolulu Board of Water Supply's (BWS) Honolulu Area Low Service System extending from Red Hill to Makapuu Point. A 12-inch main on Pensacola Street will be the service line for the proposed project. The developer will be required to obtain a water allocation from the DLNR. As a matter of policy and practice, the BWS has been requiring State-sponsored developments to secure their own water supply allocation. This allocation is secured through the DLNR, Division of Water and Land Development. Based on discussions with DLNR, it is anticipated that water will be made available for the project.

2. Sewer

The sewage system serving the project site is part of a regional system extending from Kuliouou to Nuuanu. The proposed project will be connected to the 48" East End Relief Sewer under Kapiolani Boulevard. Determination of sewer adequacy will be made through approval of the "Application for Sewer Connection" by the City and County DPW, Division of Wastewater Management. A Wastewater System Facilities charge is also applicable to the proposed project.

3. Drainage

Surface runoff from the project site is collected by inlets and lines connected to major trunk lines passing through the Kakaako District. A drainage line runs along Pensacola Street. Runoff from the built-over portion of the project site will be directed toward a sump area near Pensacola Street where it will be collected and diverted into the drainage line on Pensacola Street. Runoff from the open space on the makai side of the project site will be directed to Kapiolani Boulevard, eventually reaching catchment basins, thus retaining existing flow patterns.

4. Electrical/Telephone

Electrical service is provided by Hawaiian Electric Company (HECO) through an underground service duct located along Kapiolani Boulevard.

Telephone service for the project area is provided by GTE Hawaiian Telephone Company. In the vicinity of the project site, all phone lines are located underground.

5. Gas

Gas for the project site is provided by Gasco, Inc. from storage facilities located at Barbers Point. The vicinity of the project site is serviced through a network of distribution lines and service laterals.

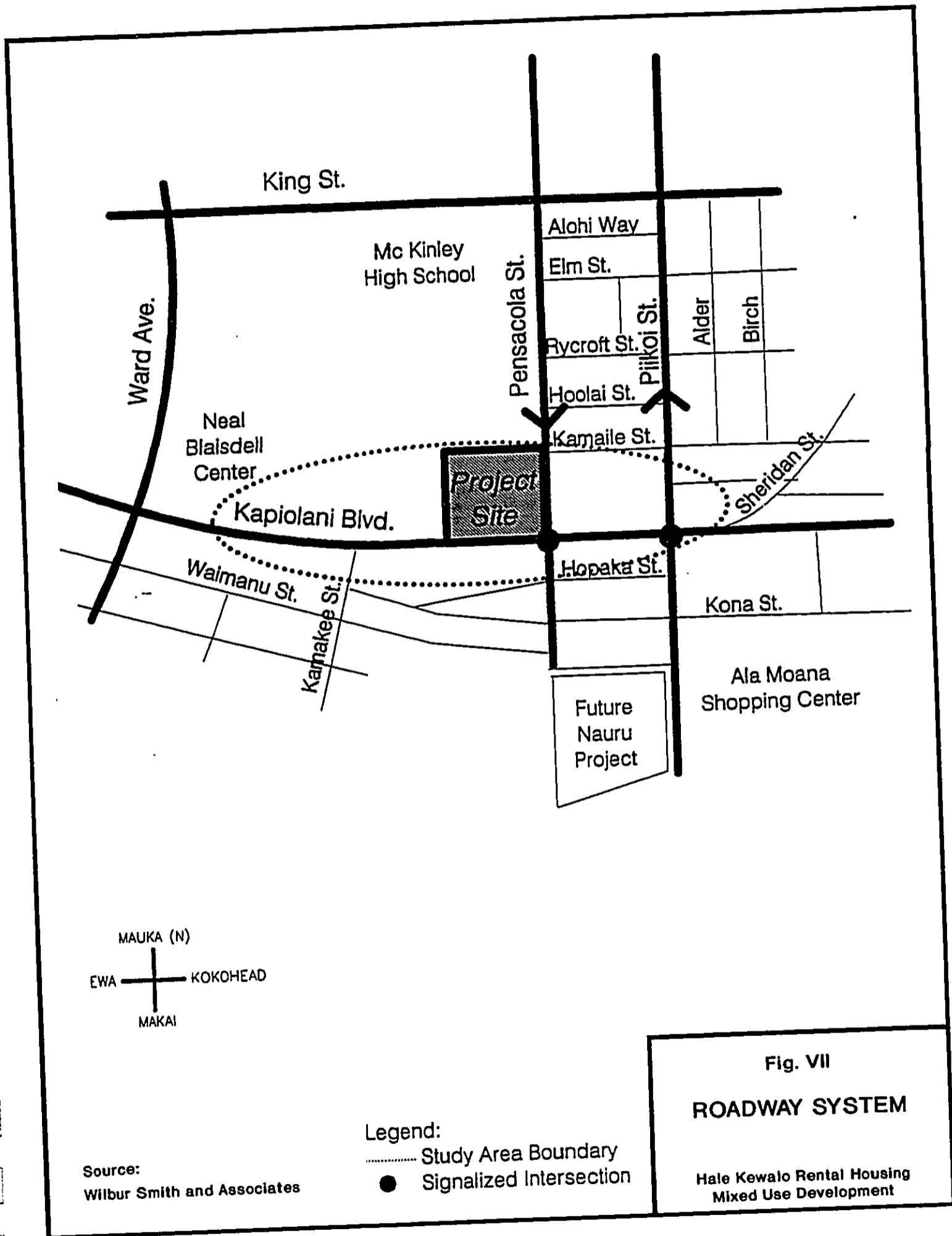
6. Roadway System

The principal road network serving the project site is shown on Figure VII from a traffic study of the area completed in May 1992 by Wilbur Smith Associates and included as Appendix C. Kapiolani Boulevard is a major arterial serving Ewa-Diamond Head direction traffic through Honolulu. There are three travel lanes in each direction, although during the morning and afternoon weekday peak periods, cones are used to provide an additional lane in the peak travel direction.

Pensacola and Piikoi Streets form a one-way couplet for makai- and mauka-bound traffic respectively. Mauka of Kapiolani Boulevard, both streets accommodate four travel lanes and allow parking on both sides of the street. There are turn restrictions at the two signalized intersections during peak periods. Diamond Head-bound left turns from Kapiolani Boulevard to Piikoi Street are prohibited

from 6:30-8:30 A.M. Ewa-bound left turns from Kapiolani Boulevard to both makai-bound Piikoi and Pensacola Streets are prohibited in the afternoon from 3:30 to 5:30 P.M.

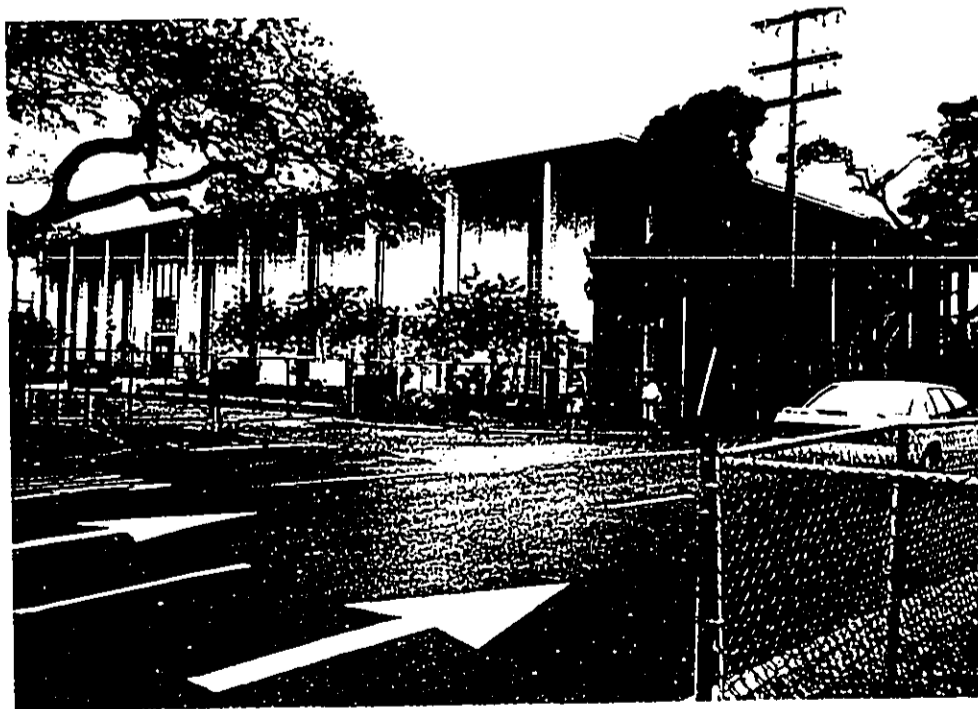
Access to the main parking lot (190 spaces) of the ETO is currently provided by a single driveway along Pensacola Street about 250 feet mauka of Kapiolani Boulevard. Only right-turns in and right-turns out are permitted due to the one-way circulation system. The two small lots (72 spaces) serving Building 857 are presently accessed via the McKinley High School driveway which lies approximately 690 feet mauka of Kapiolani Boulevard.



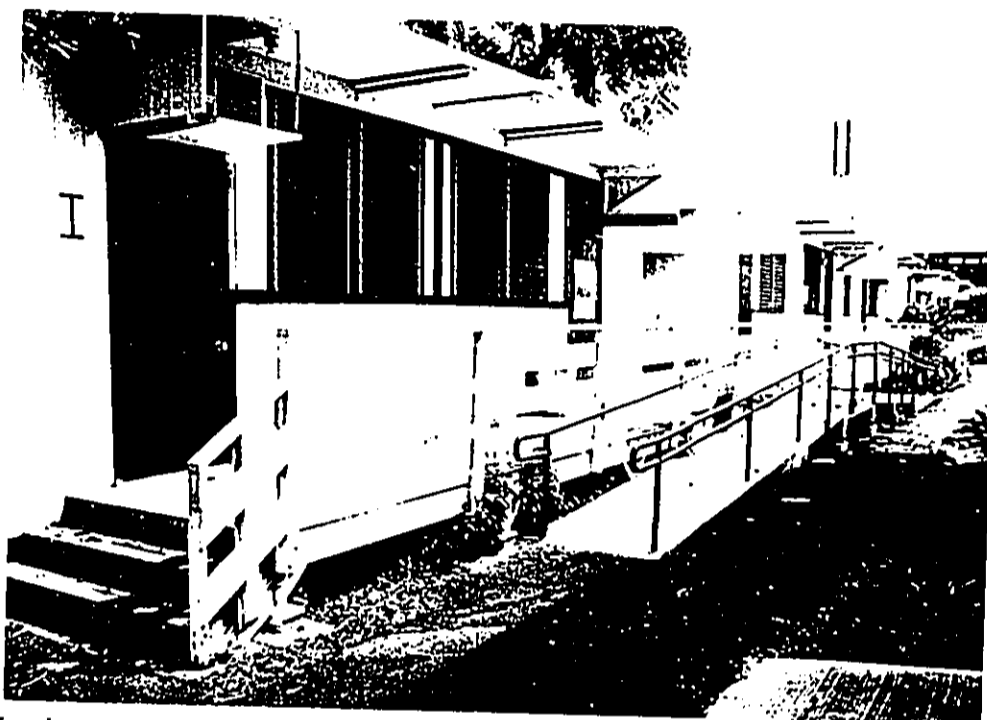
PHOTOGRAPHS OF THE PROJECT AREA



Partial review of project site at Kapiolani Blvd. and Pensacola Street. NBC Arena in background with Central Business District as backdrop.



Building 857 to remain intact for use by DOE. The building temporarily housed the main branch of the State Library during renovation of permanent facility.



Wooden, one-story portables to be demolished. Nauru Tower in background.



A concrete two-story building occupied by ETO prior to Summer 1992. To be demolished.

III. SOCIOECONOMIC CHARACTERISTICS

A social impact assessment for the proposed project was prepared by Earthplan and is included in Appendix E. The area studied in this assessment is bounded by King Street on its mauka side and extends to the ocean. From east to west, the study area extends from Kalakaua Avenue and Ala Wai Boulevard to Keawe Street and South Street.

The study area was divided into sub-areas which generally coincide with census tract designations. See Figure IX. From east to west, they are as follows:

o Sub-Area 1

This Sub-Area is bounded by Kalakaua Avenue on the Diamond Head side and Keeaumoku Street on the Ewa side. It runs mauka-makai from King Street to Kapiolani Boulevard and is coterminous with Census Tract 36.98

o Sub-Area 2

This Sub-Area is roughly rectangular in shape. It is bounded by Kapiolani Boulevard, Keeaumoku, King and Pensacola Streets and is coterminous with Census Tract 36.97.

o Sub-Area 3

The project site is located in this Sub-Area. On the Diamond Head side, this Sub-Area is bounded by Pensacola Street, Kapiolani Boulevard, Kalakaua Avenue and the Ala Wai Canal. Ward Avenue forms the Ewa boundary. This Sub-Area is coterminous with Census Tract 37.

o Sub-Area 4

Sub-Area 4 is bounded by Beretania Street, Ward Avenue and King Street, and extends to the ocean. From east to west, this Sub-Area extends from the Diamond Head end of Kewalo Basin and Ward Avenue to Keawe Street and South Street. This Sub-Area is approximately coterminous with Census Tract 38.

Some key statistics of the study area are summarized below.

A. Demographics

In 1990, the study area contained an estimated 10,657 residents. Almost half of these residents lived in Sub-Area 1.

The study area is generally older than the islandwide community. While the most populous age group was the 18 to 44 year-olds, there were proportionally fewer youngsters and more elderly residents. Compared to the islandwide median age of 32.2 years, study area median ages ranged from 36.7 in Sub-Area 4 to 46.7 in Sub-Area 3.

The majority of study area residents was born in Hawaii. When compared to the islandwide community, more study area residents originated from another country. Almost 30 percent were born abroad. In Sub-Area 1, over one-third of the residents were foreign-born. There was also a high proportion of people born in another state. In Sub-Area 3, almost half of the population was born in another state and over 30 percent were born in another country. The only exception to this trend was Sub-Area 2, where over 69 percent of the residents were Hawaii-born.

People of Japanese ancestry comprised one-third of the total study area population. This is a high proportion when compared to the islandwide share of 23 percent. The next largest ethnic group was Caucasian at 29 percent. The study area also had relatively high proportions of Chinese and Korean residents.

There were significant variations in educational attainment among the different Sub-Areas. In Sub-Areas 3 and 4, 58 and 38 percent, respectively, completed four years of college. This is high compared to 26 percent islandwide. In Sub-Area 2, on the other hand, only 16 percent were college graduates. In Sub-Area 1, over one-fourth did not complete high school and 21 percent had a four-year college education.

The majority of study area residents are in technical or sales occupations. The study area had an unemployment rate of 2.5 percent which is low compared to the islandwide rate of 3.5 percent in 1990.

B. Family Characteristics

The study area was generally less family-oriented. Only 57 percent of the study area population lived in families, as compared to an islandwide proportion of 82.4 percent. Slightly over 75 percent of the family households were married couples and there were

proportionally more families headed by single males and single females than throughout Oahu.

The Oahu median family income was \$45,313 in 1990. Median family income was low in Sub-Areas 1 and 2, at \$28,391 and \$31,061, respectively. In Sub-Areas 3 and 4, however, the median family incomes were high at \$47,833 and \$55,000, respectively.

C. Housing and Households

In 1990, the study area contained 6,655 housing units. The majority, or almost 63 percent, were renter-occupied. Household sizes were small, ranging from 1.63 persons in Sub-Area 1 to 1.96 in Sub-Area 2.

Overall, there was a higher than average vacancy rate in the study area, but this is attributed to the presence of unoccupied, recently-built homes in Kakaako during census taking. Approximately 70% of the residential structures are comprised of more than 50 units.

Median rent was generally high in the Sub-Areas under redevelopment, but low in the older areas. Median rents in Sub-Areas 3 and 4 were \$765 and \$1,001, while the median rents of Sub-Areas 1 and 2 were \$574 and \$482, respectively.

Over twelve percent of the housing units in the study area contained more than 1.5 persons per room in 1990. In Sub-Areas 1 and 2, 15.7 and 11 percent, respectively, of the housing units contained more than 1.5 persons per room.

IV. RELATIONSHIP TO PLANS AND POLICIES

The plans and policies relating to the proposed project range from broad program guidance offered by the Hawaii State Plan to land use controls governing the development of the site. A number of State plans, policies and controls guide development within the State of Hawaii. These include the Hawaii State Plan, State Functional Plans, the State Land Use Law, and the Kakaako Community Development District Mauka Area Plan. The proposed project will be developed in consonance with various land use plans, policies and regulatory controls. The following is a review of these plans and policies.

A. Hawaii State Plan

The Hawaii State Plan establishes a statewide planning system that provides goals, objectives, and policies which detail priority directions and concerns of the State of Hawaii. The rental housing component of the project is consistent with the following State goals, objectives, policies and priority guidelines:

[§226-19] Objectives and policies for socio-cultural advancement--housing. (a) Planning for the State's socio-cultural advancement with regard to housing shall be directed towards achievement of the following objectives: (1) Greater opportunities for Hawaii's people to secure reasonably priced, safe, sanitary, livable homes located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals; and (2) The orderly development of residential areas sensitive to community needs and other land uses.

(b) To achieve the housing objectives, it shall be the policy of this State to: (2) Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households; (3) Increase rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing; (5) 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; and (6) Facilitate the use of available urban lands to accommodate the housing needs in various communities.

The ETO component of the project is consistent with the following State goals, objectives, policies and priority guidelines:

[§226-21] Objectives and policies for socio-cultural advancement--education. (a) Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.

(b) To achieve the education objective, it shall be the policy of this State to: (2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs; (4) Provide job preparation training for groups experiencing critical unemployment conditions; (5) Provide higher educational opportunities that enable Hawaii's people to adapt to changing employment demands; (6) Assist individuals, especially those who are disadvantaged in meeting job qualifications, through manpower and other related training opportunities; and (7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking and reasoning.

Employment opportunities from short-term construction of the project, as well as long-term staffing of the ETO and maintenance of the facilities are consistent with the following State goals, objectives, policies and priority guidelines:

[§226-6] Objectives and policies for the economy--in general. (a) Planning for the State's economy in general shall be directed toward achievement of the following objectives: (1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaii's people; and (2) A growing and diversified economic base that is not overly dependent on a few industries.

(b) To achieve the general economic objectives, it shall be the policy of this state to: (6) Strive to achieve a sustained level of construction activity responsive to, and consistent with, State growth objectives; and (14) Encourage businesses that have favorable financial multiplier effects within Hawaii's economy.

B. State Functional Plans

The Statewide planning system requires the preparation of State Functional Plans which are approved by the Governor. State Functional Plans implement the goals, objectives, policies and priority guidelines of the Hawaii State Plan. They are intended to act in a coordinated fashion with County General Plans and Development Plans, thus providing the detailed linkage between State programs and State policy.

1. Housing Functional Plan

The State Housing Functional Plan is one of fourteen plans designated by Chapter 226, Hawaii Revised Statutes (HRS). The plan provides long-range direction for housing development and joint public and private efforts to finance, build and maintain an adequate supply of affordable housing. To address the State's housing shortage, the Plan focuses on housing initiatives in six priority areas, including rental housing availability and affordable housing development. The rental housing component of the proposed project is consistent with the following objectives and policies:

Objective B: *Sufficient amount of affordable rental housing units by the year 2000 so as to increase the State's rental vacancy rate to at least 3%.*

Policy B (1): *Direct state, county and federal resources toward the financing and development of rental housing projects.*

Policy B (3): *Ensure that projects which impact housing provide affordable rental opportunities for employees.*

Policy B (4): *Fully utilize rental subsidy programs funded by the state, county and federal governments.*

Objective E: *Acquire and designate lands suitable for housing development in sufficient amount to locate the deficit in housing units by the year 2000.*

Policy E (1): *Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, employment and other concerns of existing communities and surrounding areas.*

Policy E (2): *Wherever practical, develop affordable housing projects on public lands.*

2. Education Functional Plan

The purpose of the Education Functional Plan is to provide a unified, consensus approach to innovative solutions for the issues facing the State's educational curriculum, staff and facilities needs. The ETO component of the proposed project is consistent with the following objectives and policies:

Objective A (4): *Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.*

Policy A (4)(c): *Pursue actions with other agencies which will insure adequate and appropriate services and facilities on a timely basis.*

Policy A (4)(d): *Utilize Capital Improvement Program (CIP) funds to meet the need for more classrooms and facilities, to respond to minor CIP requests on a timely basis, and to meet other requirements such as architectural barrier corrections, noise abatement, and County requirements.*

Policy A (4)(o): *Obtain more resources and facilities for daytime adult basic skill classes.*

Objective B (3): *Increase and improve the use of information technology in education and encourage programs which increase the public's awareness and understanding of the impact of information technologies on our lives.*

Policy B (3)(d): *Promote and expand the appropriate use of technology (e.g. telecommunications, computers) to deliver long-distance education as well as enhance the learning process and communication competencies of students.*

3. **Employment Functional Plan**

The purpose of the Employment Functional Plan is to guide employment, training and human resources services in Hawaii. The Plan emphasizes employment issues requiring immediate attention, and presents specific initiatives in four priority areas, including education and preparation-for-employment services, and job placement. The ETO component of the proposed project is consistent with the following objectives and policies:

Objective I.A: Improve the qualifications of entry level workers and their transition to employment.

Policy I.A.2: Establish proactive measures to increase access of special needs populations to education and training which promote career choices and upward mobility.

C. **State Land Use Law**

Pursuant to the Hawaii Land Use Law (Chapter 205, HRS), all lands in the State are classified by the State Land Use Commission (LUC) into four land use districts: Urban, Agricultural, Conservation and Rural. The proposed project is located in an Urban district where it is a permitted use. Therefore, no boundary amendment to reclassify the site is required. The Urban district is defined as *"land characterized by 'city-like' concentrations of people, structures, streets, an urban level of services and other related land uses."*

D. **Hawaii Community Development Authority -- Mauka Area Plan and Rules**

In 1976, the State Legislature created and empowered the Hawaii Community Development Authority (HCDA) to *"join the strengths of private enterprise, public development and regulation into a new form capable of long-range planning and implementation of improved community development"* (Chapter 206E, HRS).

The Mauka Area Plan addresses a 450-acre section of Kakaako bounded by Piikoi Street, Ala Moana Boulevard, Punchbowl Street and King Street as shown in Figure X. The State Legislature found in the Mauka Area *"the potential for increased growth and development that can alleviate community needs such as housing, parks and open space, and commercial and industrial facilities."* It provides a framework for district-wide

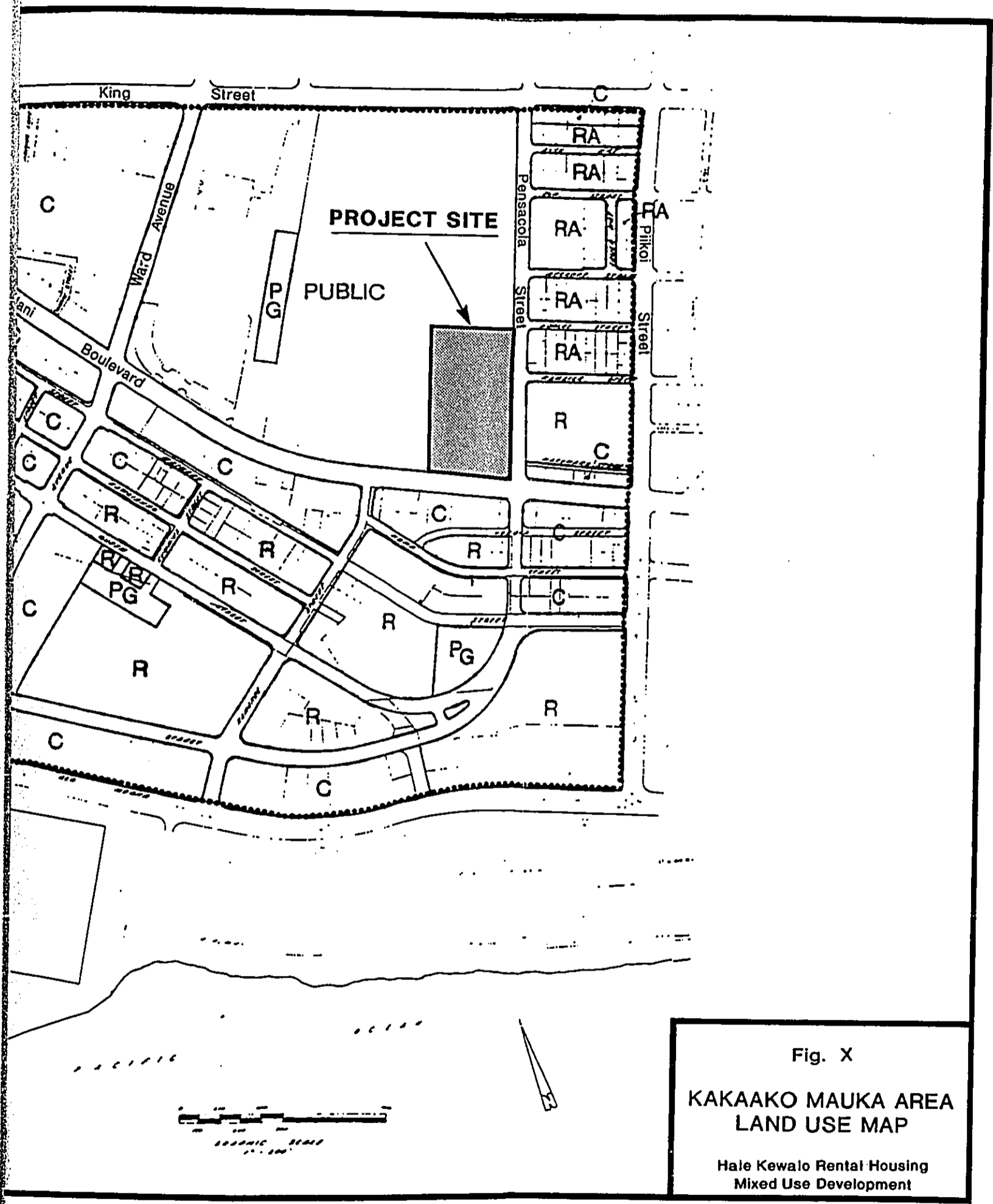
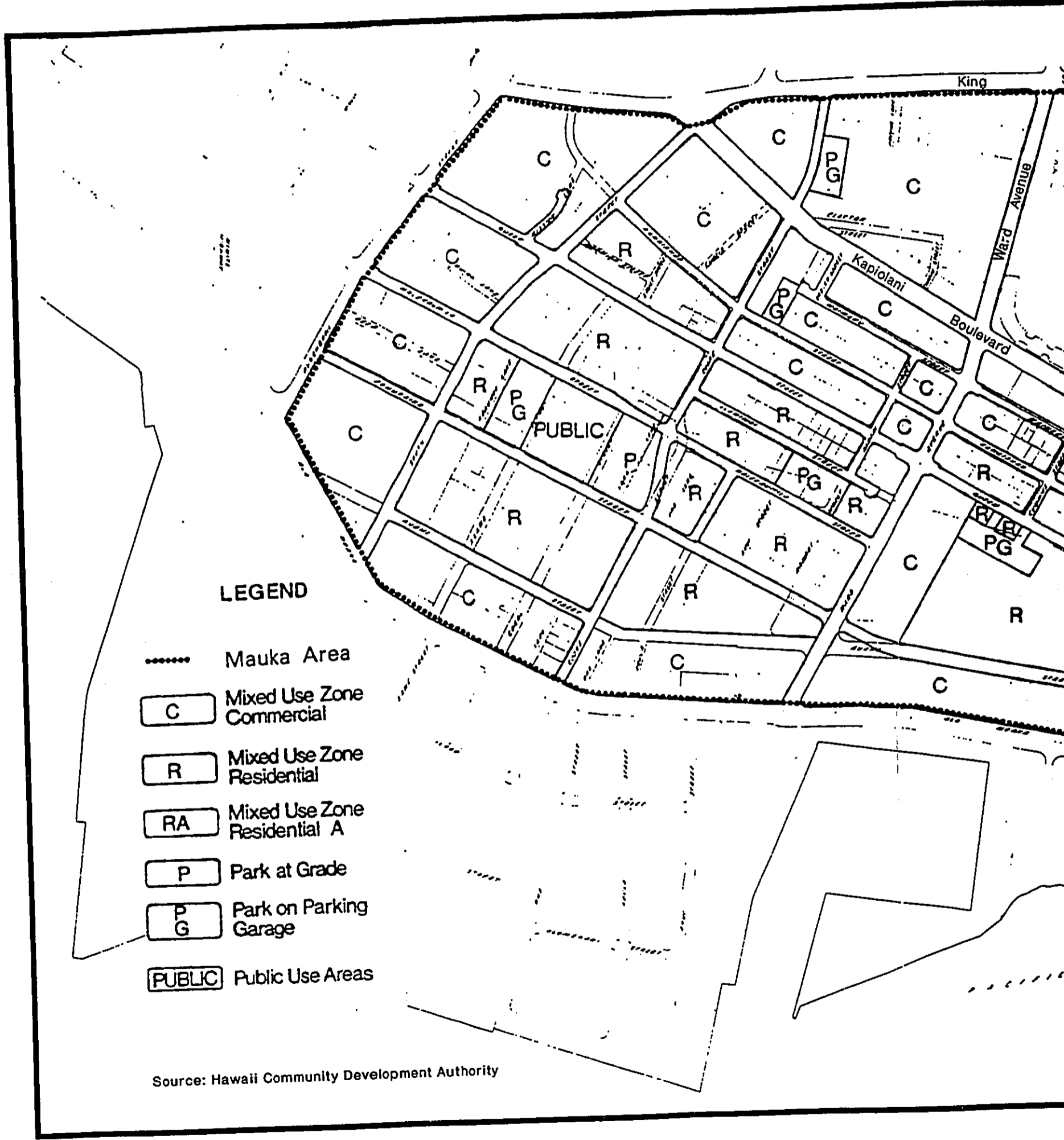


Fig. X

KAKAAKO MAUKA AREA
LAND USE MAP

Hale Kewalo Rental Housing
Mixed Use Development



LEGEND

- Mauka Area
- C** Mixed Use Zone Commercial
- R** Mixed Use Zone Residential
- RA** Mixed Use Zone Residential A
- P** Park at Grade
- PG** Park on Parking Garage
- PUBLIC** Public Use Areas

Source: Hawaii Community Development Authority

community development and improvements until the year 2012, and serves as a decision-making tool to guide both public and private sector actions in the revitalization of the Mauka Area.

The Plan refers to a strong demand for housing development in the Mauka Area. State of Hawaii projections indicate that Oahu's resident population may increase by more than 150,000 people between 1985 and 2000. More than 50,000 housing units will be needed to accommodate this population increase and expected changes in household size. The Mauka Area's central Honolulu location makes it a prime candidate for additional housing units conveniently located near employment. A significant increase in residential floor area is forecasted. The following table presents an allocation of land uses in the Mauka Area as they could be distributed in 25 to 30 years. The forecasted 17.1 million square feet of residential floor area referred to on the table could be accommodated in the Mauka Area without sacrificing space needed for other uses and community amenities.

Kakaako Mauka Area Land Uses			
FLOOR AREA			
Land Use	Existing (1990)	Mauka Area Plan (2015-20)	
	million square feet	million square feet	percent
Commercial	2.8	13.7	38
Industrial	4.6	5.3	15
Residential	1.1	17.1	47
Total	8.5	36.1	100

Source: Mauka Area Plan: Kakaako Community Development District

The importance of open space and recreational opportunities throughout the Mauka Area was recognized in the Legislature's development guidance policies for Kakaako. The Legislature called for open spaces and parks to be provided as "necessary community facilities" within residential developments. A total of approximately 75 acres of recreation space was envisioned in the Mauka Area at full build-out; one-half provided by public parks and the other half by private development.

The need for public facilities, including educational facilities, is based upon population/facility requirements. At the time that the Mauka Area Plan was prepared, it was anticipated that two elementary schools would be needed at full build-out. One potential elementary school site was identified at the Hale Kewalo project site, possibly sharing the site with KCC in the event of "a reduction in the activities of the college". The ETO has come to occupy the site since the Mauka Area Plan was prepared. The plan notes the priority of vocational education for supporting activities in the Mauka Area.

The zoning for the project site is designated in the Mauka Area Rules as "Public", which is defined as a public use area. For a "Public" area, the adjacent zoning applies. For the Hale Kewalo site, which is adjacent to both the MUZ-R (mixed-use zone with residential emphasis) and MUZ-C (mixed-use zone with commercial emphasis), the more restrictive MUZ-R zone was applied. Under this zone, residential, commercial, industrial and public uses may co-exist compatibly within the same development lot.

According to the Mauka Area Rules, the proposed project will require a planned development permit. This permit is required for any proposed development in the Kakaako area which is greater than 45 feet in building height or whose floor area ratio is greater than 1.5. In order to obtain this permit, the proposed project must meet certain conditions of development. For development lots over 80,000 square feet, such as the subject project, the maximum building height shall not exceed the limit of 400 feet from grade, the floor area ratio shall not exceed 3.5, and the footprint of the tower shall not exceed 16,000 square feet. The proposed project is designed with a building height of 258-260 feet, a floor ratio of 2.10, and footprints of the UH tower and the moderate income tower are 8,244.3 square feet and 8,353.4 square feet, respectively.

The Final Environmental Impact Statement (FEIS) for the Kakaako Community Development District Plan, covering the Mauka Area, was filed in June 1983. The Final Supplemental Environmental Impact Statement (FSEIS), covering the Makai Area of the District Plan, was filed in May 1985.

E. Faculty Housing Assistance Master Plan

The University of Hawaii's Faculty Housing Assistance Master Plan evaluated the housing needs of the different faculty ranks. These ranks ranged from Rank 2, Instructor to Rank 5, Professor. There were some variations in the UH faculty salaries when compared to other colleges and universities, but these variations were not significant. Further, while faculty salaries affect housing affordability, Hawaii's housing market prices have escalated to levels at which not plausible adjustments to professorial base

salaries could adequately serve to close the gap between salaries and housing affordability.

It was found that without effective housing programs, affordability factors and the Hawaii housing market can be expected to discourage qualified mid-level Assistant to Associate Professors from seriously considering or remaining at UH. Historically, one-fourth of UH faculty resignations were due to lack of available affordable housing. The greatest attrition occurs in Rank 3, Assistant Professor.

The UH has established a Faculty Housing Assistance Program which incorporates programs similar to numerous peer research universities located in similarly high-cost housing areas. The program has six categories as follows:

- o Information/counseling assistance and program administration;
- o University rental housing;
- o Mortgage assistance;
- o Downpayment assistance;
- o Housing allowance assistance; and,
- o University for-sale housing.

Of the six housing assistance programs, the development of rentals is considered a high priority. This effort can be achieved within a relatively short period of time, and will meet the needs of the groups which are currently most at-risk.

UH is planning to develop two faculty rental housing projects, one of which is Hale Kewalo. The other project, as yet unnamed, is located in Manoa near Noelani Elementary School. The project will include 142 units, of which six will be three-bedroom units, and 136 will be two-bedroom units. It is scheduled for completion in summer of 1994.

The only long-range plan to increase faculty housing units is to develop these units in conjunction with the second campus in Kapolei although this action is not expected in the foreseeable future.

V. **PROBABLE IMPACTS AND MITIGATIVE MEASURES**

The redevelopment of the Kakaako district establishes the context for assessing potential construction impacts. There is relatively less concern regarding natural terrestrial habitats, which are limited to landscaping, and greater emphasis on urban concerns, such as traffic, noise and air quality, as well as concern for disturbance of potential archaeological features.

A. Short-Term Impacts

Short-term impacts are limited to the construction phase of the project. Demolition and subsequent construction are expected to take 17 months. Basic mitigative measures are required. Standard dust and noise control measures will be implemented. In addition, subsurface archaeological tests will be conducted after demolition of existing structures but prior to construction of the proposed project. Construction activities will be monitored for evidence of archaeological or historical artifacts.

1. **Noise**

Development of the site will involve demolition, excavation, grading, pile driving and the construction of buildings and infrastructure. Noise-sensitive land uses in the immediate vicinity will be affected by construction noise. Such uses include educational and administrative office functions at the McKinley High School campus and nearby residences. Businesses in the area may also be affected although they are not generally regarded to be as noise-sensitive as schools and residences.

In cases where construction noise is expected to exceed limits set by the Department of Health (DOH), a permit to allow such noise is required. Permit conditions will include restrictions on permissible operating hours. Mufflers and other noise-attenuating equipment will be required for construction vehicles. There will be no nighttime construction.

Some of the construction phases, particularly pile driving, will generate significant noise. A noise study of the proposed construction activity indicates that the DOE's construction noise criterion of $L_{50} > 62\text{dBA}$ will be exceeded during pile driving in naturally ventilated classrooms which are located within 1,000 feet of the pile driver according to the Acoustic/Vibration study included in Appendix D. Exceedance of that criterion is predicted to occur in air

conditioned classrooms located within 250 feet of the pile driver. It is estimated that pile driving will last approximately 35 days of the anticipated 17-month construction schedule. The HCDA intends to conduct pile driving when school is not in session, although this may not be entirely possible. Measures such as pre-drilling to reduce the number of blows required to drive piles, and attenuation such as air conditioning classrooms will be considered to reduce noise impacts during pile driving. Additional noise studies may be required to determine specific mitigation measures.

2. Vibration

Due to the presence of some fairly old structures on the McKinley High School campus which are located near the proposed pile driving activity and also because some of the structures on campus have historic value, a study of vibration impacts from pile driving was conducted and is included as Appendix D. The study concluded that the potential for damage to the historic structures is very low. The primary concern centers on the caretaker's cottage which is not a historic building, but is a fairly old wooden structure adjacent to the project site. Seismographic monitoring was recommended to address the possibility that damage to this structure could be incurred. The threshold value recommended is ten times lower than the maximum for which no structural damage would result. Monitoring will be done during test pile driving to determine the appropriate pile, pile driver and methods, such as pre-drilling, to be used for preventing damage to structures.

3. Air Quality

Fugitive dust will be generated during site preparation work, particularly during dry and windy conditions. Without appropriate controls, such dust emissions could adversely affect the neighboring high school, nearby residences, and businesses. State air pollution control regulations require that there be no visible fugitive dust at the property line. Dust emissions will be controlled by watering active work areas and covering open-bodied trucks.

To a lesser extent, exhaust emissions from stationary and mobile construction equipment and workers' vehicles may also affect air quality during the construction phase. Traffic congestion during construction will be minimized by scheduling the movements of large construction vehicles to avoid peak traffic hours.

Commuting construction workers will add to vehicular emissions during the peak traffic periods. Their contribution will be offset, however, by the elimination of emissions from commuting traffic of the existing ETO facility when it is abandoned.

4. Water Quality

During construction, and particularly during grading and excavation for building foundations, soil will be exposed and potentially susceptible to runoff in the event of heavy rain. By adhering to City and County grading ordinances, soil runoff will be controlled. The runoff effluent will be directed to existing drainage facilities on Pensacola Street. The grading ordinances generally address concerns relating to added silt in stormwater runoff entering drainageways and ultimately the receiving waters at Kewalo Basin. Because the area of soil disturbance will be less than five acres, the project will not be subject to requirements of the National Pollution Discharge Elimination System (NPDES) permit. That permit is required for larger projects which have the potential for discharging greater volumes of soil runoff and requires the preparation of a management plan for approval by the State Department of Health.

5. Public Health and Safety

Construction sites typically pose various safety hazards to the public, particularly during non-work hours such as evenings, weekends and holidays. Necessary mitigative measures to assure public health and safety will be provided throughout all phases of construction. During non-work hours, construction areas will be secured by adequate warning signs and other safety devices as required by State of Hawaii and City and County of Honolulu regulations.

6. Flora/Fauna

A single monkeypod tree will be relocated during construction to accommodate the proposed parking garage. This tree will be transplanted within the project site. There are no known rare or endangered species of flora or fauna in or around the project area.

7. Economic

Short-term economic impacts resulting from construction include the provision of construction-related jobs as well as increased business for local material suppliers.

Retail businesses may also benefit through a multiplier effect from increased construction activities.

8. Traffic/Parking

Trucks, heavy equipment and other vehicles will use existing roads to import and export materials and to access construction areas. The increased traffic from construction-related vehicles should not be significant, but may cause some minor inconveniences to the high school and residents and businesses in the vicinity. Movement of heavy equipment will be restricted to off-peak traffic hours.

Commuting construction workers will add to vehicular traffic during the peak traffic periods. Their contribution will be offset, however, by the elimination of commuting traffic from the existing ETO facility when it is abandoned.

During construction of the project, it is anticipated that all construction-related vehicles will park within the project site and, thus, will not affect street parking in the vicinity. At least 1.75 acres of the project site will not be built over since it will become the park/open space. This area could accommodate parking during most phases of construction. In the event that parking on the site is precluded during some phases of construction, competition for street parking in the vicinity could increase. Occasional restrictions on street parking may also be necessary to accommodate delivery of construction materials.

9. Archaeological/Historical

The archaeological study conducted for the project determined that there is little of archaeological significance in the nearby Kakaako area except the presence of human burials of pre-contact and post-contact origin. As recommended by the archaeological study, reproduced in Appendix B, subsurface test excavations on the project site will follow demolition of existing structures and precede new construction. This recommendation is typical for projects where existing uses preclude subsurface testing. A report of findings will be submitted to the State Historic Preservation Division (SHPD). A specific concern of the SHPD is the possible presence of wetland deposits which may contain information on the pre-contact environment and Hawaiian archaeology. As recommended in the archaeological study, this concern will be addressed by coring and subsequent pollen and dating analyses in the event that intact wetland deposits are encountered during test excavations. If major findings are uncovered during testing, data recovery procedures would be the next step in mitigating impact on

archaeological resources. The SHPD is in concurrence with the conclusions and recommendations of the archaeological study.

Due to the presence of nearby structures listed on the National and State Registers of Historic Places, a study of vibration impacts from pile driving was conducted, and can be referenced in Appendix D. The study concluded that the potential for damage to the historic structures is extremely low. Nevertheless, seismographic monitoring has been recommended to address the slim possibility that damage could be incurred. The threshold value recommended is ten times lower than the maximum for which no structural damage would result. Monitoring will be done during the test pile driving to determine the appropriate pile, pile driver and methods, such as pre-drilling, to be used for preventing damage to structures.

B. Long-Term Impacts - Environmental

Long-term impacts of the project will occur within the broader context of the on-going Kakaako redevelopment which is changing the character of the area.

1. Flora/Fauna

No rare or endangered species of flora or fauna are known to inhabit the project site. Any loss of vegetation during construction will be effectively mitigated by landscaping of the grounds.

2. Flood Hazard

Since the proposed project site is located in a flood zone according to the Flood Insurance Rate Map, measures such as elevating the lowest habitable floor above the base flood elevation will be taken to mitigate potential flood problems. Flood heights have been determined by a flood study conducted for the project and reproduced in Appendix A. The proposed project site is located outside of areas subject to tsunami, erosion and landslide hazards.

3. Traffic

The key intersections (Piikoi, Pensacola, Kapiolani) impacted by the project are expected to operate at acceptable levels of service for weekday peak traffic periods, according to a traffic study conducted for the project and included in Appendix C. Due to the large capacity of the thoroughfares serving the project, traffic generated by the project should not significantly change traffic conditions

in the vicinity of the project. Traffic from the proposed Hale Kewalo development will comprise approximately 4 percent of the traffic flow in the immediate vicinity of the project. Dispersion of traffic as distance from the project increases will reduce this proportion to negligible levels within a few blocks of the project.

The most significant impact to traffic in this area will occur without the project. A four-phase project by Nauru Phosphate Royalties Trust Company is located at the intersection of Piikoi Street and Ala Moana Boulevard and is expected to increase traffic volumes in this area as successive phases are completed over the next several years.

The traffic study recommends several modifications to improve traffic operations along Pensacola Street at the project site. On-street parking should be removed from the Ewa side of Pensacola Street along the project frontage. This would provide a deceleration lane for traffic turning into the site driveway, and improve sight distance for traffic exiting the driveway. Also, the one midblock on-street parking section along the Diamond Head side of Pensacola Street in the block mauka of Kamaile Street should be eliminated to improve the sight distance for vehicles exiting Kamaile Street. This would improve the sight distance and safety for both those vehicles enroute to the site, as well as other vehicles, which use this block of Kamaile Street.

4. Parking

The Hale Kewalo project will provide a total of 716 parking spaces within the development. This exceeds the HCDA's requirement of 662 spaces for the various uses by 54 spaces. By comparison, 10 to 12 on-street parking spaces will be lost as a result of prohibiting parking on the Ewa side of Pensacola Street along the project site, and another 3 to 4 spaces will be lost by prohibiting parking on the Diamond Head side of Pensacola, immediately mauka of Kamaile Street. Parking demands in the area will be further addressed by the planned expansion of the municipal parking garage at Neal Blaisdell Center where an additional 400-600 stalls will be built. The HCDA is also planning to build a multi-story parking garage at the corner of Pensacola and Waimanu Streets, where a 140-stall at-grade public parking lot is currently located.

5. Air Quality

Marginal impacts on air quality will occur primarily as a result of emissions from increased vehicular traffic generated by the proposed project within the vicinity of the site. Air quality, however, is also dependent upon the quality of emissions from vehicles. Due to government-mandated emission control standards on newer vehicles, they are significantly less polluting than older vehicles. As older vehicles are retired from service, air pollution is reduced. In many cases, computer-modeled air quality studies indicate that air quality will improve in spite of significant increases in traffic.

The proposed project is anticipated to increase peak hour traffic in the vicinity by approximately four percent, which is a marginal increase. With the proposed prohibition on parking on the Ewa side of Pensacola Street near the project, future traffic with the project will only increase the delay time at the Pensacola/Kapiolani intersection by two seconds. Delay time is a concern with respect to air quality since the longer cars are left to idle at an intersection, the more air pollutants they generate. A two second delay will have negligible impact on air quality at the intersection.

6. Water Quality

Long-term water quality will not be affected by the project. Since all soil exposed during construction will either be built over or revegetated, the potential for soil runoff will be minimized. Drainage from the site will be directed to drainage facilities on Pensacola Street.

7. Noise

Following construction, activities within the project area itself will not be generating any significant noise. Increases in noise may be attributed to the marginal increase in vehicular traffic generated in the vicinity of the site by the proposed project.

8. Visual/Open Space

The Mauka Area Rules of the Kakaako Community Development District establish view corridors along certain streets in the district to "protect the scenic views of the mountains, sea and sky, to provide visual relief of building masses, and to allow light and air at the street level" (Section 15-22-66, Mauka Area

Rules). Both Pensacola Street and Kapiolani Boulevard are designated as view corridors and are subject to view corridor setbacks. The proposed project will comply with setback requirements. The proposed towers will contribute to the progressively high-rise character of the skyline in Kakaako and along Kapiolani Boulevard.

9. Archaeological/Historical

Near the proposed project site, several buildings of the McKinley High School Campus are listed on the National and State Registers of Historic Places. The State Historic Preservation Office determined in April of 1992 that the proposed project will have "no effect" on the historic character of the site.

10. Infrastructure

All utility improvements will be on-site, and all utility connections will be made from service lines adjacent to the site.

C. Long-Term Impacts - Social

1. Population Growth and Demographics

The project will add 530 housing units to the housing supply. According to the social impact assessment (Appendix E), this increase could result in a population increase of between 927 and 1,166 persons. This is an increase of between nine and eleven percent within the study area. Within the area designated by the City and County of Honolulu General Plan as the Primary Urban Center, this population increase is less than 0.3 percent, which is well within the guidelines established by the General Plan.

The proposed project is not anticipated to significantly alter the current or anticipated demographic profile of the study area. The economic profile of the study area will continue to reflect a cross-section of economic levels. With the proposed project, and the HCDA's mandate to develop more affordable units, the income levels in the study area will continue to evolve into a more well-rounded profile. Since the income qualifications for the affordable housing units and the faculty units will be the same, there will be no difference among the residents of Hale Kewalo project with respect to income.

The age of the population in the study area will continue to trend toward a younger profile with the infusion of young married couples the Hale Kewalo project will attract. The overall trend, however, is established by the redevelopment of the Kakaako area. Ethnic diversity is also likely to increase, simply because of the increase in housing units.

The educational attainment of the residents of Hale Kewalo will likely be diverse although University faculty will likely be among the more educated in the complex. With respect to their origins, residents in the general housing tower will likely have a greater representation of persons from Hawaii than will the faculty tower.

2. Impact on Supply of Affordable Housing

It is estimated by the year 2000, 85,000 housing units are needed to meet the projected formation of new households in Hawaii. Of these, 64,000 will be needed in the affordable category. The need is especially critical in the urban core, which is the center of government, economic and cultural activities, and the State's primary employment center. Based on an inventory conducted by the Housing Finance and Development Corporation, the proposed Hale Kewalo site is only one of six State-owned sites within the urban core which are physically suitable for development of affordable housing projects. The proposed project is a vital component in an ongoing effort to increase the supply of affordable housing units. Given the crucial need for housing in Hawaii, particularly the need for affordable housing in the urban core, every opportunity for this type of development needs to be taken seriously.

3. Impact on the Supply of Faculty Housing Units

Currently, the University of Hawaii operates only one faculty housing complex. Located on Dole Street in Manoa, Waihila contains 65 units in a mixture of studio, one-, two-, and three-bedroom units.

On a short-term basis, UH is planning to develop two faculty housing projects, one of which is Hale Kewalo. The other project is located in Manoa near Noelani Elementary School. Scheduled for completion in 1994, the Manoa project will include 142 units, of which six will be three-bedroom units and 136 will be two-bedroom units. Waihila will then be used to house married UH students.

The only long-range plan to increase faculty housing units are those to be developed in conjunction with the second campus in Kapolei, although this project is not expected in the foreseeable future.

The Hale Kewalo project will have a direct positive impact on the supply of faculty housing by providing a place to live for in-migrating faculty members. Indirectly, the project will also benefit the overall quality of education in the University system by helping to attract and retain qualified faculty. Honolulu's apartment rents rank the highest in the nation and are a major deterrent for potential faculty members considering moving to Hawaii for employment. For those whose incomes qualify for housing at Hale Kewalo, the availability of such housing may be a crucial factor in deciding to accept and maintain employment at the University of Hawaii.

4. *Impact on the Neighborhood*

a. *High-Rise Character*

The two high-rise towers of the Hale Kewalo project will introduce a new element to the overall low-rise character of the Neal Blaisdell Center/McKinley High School (NBC/MHS) block. The project towers will also precede other high-rise structures anticipated to join the project in establishing the urban landscape along the perimeter of the NBC/MHS block. This neighborhood is expected to change to accommodate more residents and more intense commercial activity. More high-rises are expected and superblocks will continue to be encouraged.

b. *Land Usage Pattern*

The Hale Kewalo project will change both the land use pattern and usage pattern by adding residential uses directly adjacent to McKinley High School and in close proximity to the Neal Blaisdell Center Complex. With people on-site for a 24-hour period, the neighborhood function of the NBC/MHS block will be altered. In addition to being a place where people go to school, work and gather, it will be a place where people live. This will enhance the mixed use potential of, and bring a more neighborhood atmosphere to, the block. From a land use perspective, this can be an optimal use of land, providing that the various uses can operate compatibly.

The addition of the 1.75 acre open space along Kapiolani Boulevard will have aesthetic value and will contribute positively to the supply of available neighborhood and community recreation resources.

c. Land Use Compatibility

Medium- and high-rise residential development in the vicinity of McKinley High School will occur as the Kakaako area undergoes redevelopment. This will increase the likelihood, in the long run, for potential conflicts with the school. One potential conflict that has occurred at other schools is that of neighboring residents complaining of noise generated by school activities. This has resulted in the curtailment of certain activities at the schools. Due to the immediate proximity of Hale Kewalo to McKinley High School, there is a potential for residents of the project to be impacted by noise generated at the high school. A provision in the rental agreements will apprise tenants that they may be subjected to noise impacts from the high school. While this may not prevent tenants from complaining, it provides the school with an advantage in addressing any complaints. In addition, the DOH rules were changed in 1989 such that complaints against schools are not valid while normal school activities are underway between 7 A.M. and 10 P.M. While the carnival and fairs which are held at the McKinley High School athletic field may extend past the nighttime limit, these limited, once-a-year events are more tolerable, particularly if tenants are apprised of their occurrence in their rental agreements. Toward providing tenants with a means of mitigating potential noise disturbances, the housing units in Hale Kewalo will be designed to accommodate air conditioning units so that windows can be closed to attenuate noise.

5. Impacts on Public Services and Facilities

a. Police Protection

The project will increase the resident population in this area and, therefore, increase the need for police protection. This increase is not expected to be significant, however; nor is it expected to exacerbate existing crime problems in the area.

b. Fire Protection

Hale Kewalo will increase the need for fire protection services, but it is not expected to significantly impact the delivery of services.

c. Schools

The projected enrollment based on the number and types of proposed units at Hale Kewalo is as follows:

Grade K-5	72 students
Grade 6-8	9 students
Grade 9-12	27 students

The project will most significantly affect Kaahumanu Elementary School which, according to DOE is currently operating at capacity. The actual extent to which the project, when completed two years hence, will impact Kaahumanu Elementary, however, remains to be determined. Insufficient information exists on how potentially declining demand from older, more stable neighborhoods serviced by Kaahumanu Elementary School may serve to offset gains attributable to the Hale Kewalo project. Recent steps taken by the DOE toward the preparation of an Action Plan for school facilities for the Honolulu District should prove useful in clarifying this issue, as well as defining options and strategies to meet the area's long-term education needs.

d. Parks and Recreation

The demands of Hale Kewalo residents on existing public parks and recreation facilities will be tempered by the availability of a 35,988 square-foot recreation deck for use by Hale Kewalo tenants. This is approximately 5,000 square feet greater than the required allotment under HCDA rules. The recreation deck will include a tot lot, exercise area, barbecue, meeting/conference room, basketball/volleyball court and trellised and grassed areas.

Meanwhile, the proposed 1.75-acre park/open space at the corner of Pensacola and Kapiolani Streets will add to the supply of available resources in the area. The specific development program for the park site remains to be determined pending further discussion with McKinley High

School and the City and County Department of Parks and Recreation (DPR).

Potential use of the park may range from an extension of the McKinley High School athletic field to a public park, with parking available on weekends in the adjoining ETO parking lot along Pensacola Street. The park could also be dedicated to the City for general public use. Future alternatives for facilities may include those serving high school athletics, active public recreational facilities such as courts and playing fields, and passive landscaped open space.

6. Displacement

No private residences or businesses will be displaced. ETO vocational programs to be accommodated in the project will be limited to those which are compatible with the proposed residential use. Programs which may need to be relocated include food services education, Operation Nightingale (RN training program), and construction occupations and trades.

VI. ALTERNATIVES TO THE PROPOSED ACTION

A. "No Action" Alternative

A "no action" alternative would result in control of the property reverting to the UH. UH has indicated that should the project not proceed, it will seek private sector development of faculty housing through a Request for Proposal (RFP) process, ensure the return of ETO functions to the site, and possibly renovate Building 857 to consolidate University programs currently dispersed in leased spaces throughout Honolulu.

B. Alternative Sites

The project site is uniquely suited to accommodate a mixed-use facility capable of addressing multiple community needs for affordable housing, higher education, education, and recreation. While individual components could possibly be located elsewhere, alternative siting of affordable housing is highly constrained. The faculty housing component at the site remains a high priority for the University of Hawaii. It is one of the two sites planned for development that will address the recommendations of the Faculty Housing Assistance Master Plan. Provision of general affordable housing is highly constrained within the urban core. Given the large projected demand for affordable housing units, particularly in the urban core, every opportunity to provide such housing must be seriously considered.

C. Alternative Uses

The HCDA Mauka Area Plan identifies the potential of the site to be shared for elementary school use. The DOE has also expressed its preference that the site be reserved for possible use as an elementary school or expansion of McKinley High School, although it does not have specific plans for either use at present.

D. Alternative Designs

Alternative designs were examined by HCDA and the architectural firm of Anbe, Aruga & Ishizu Architects Inc. Upon deliberation, the proposed scheme was selected for its connected-facility design which uses space most efficiently and maximizes open areas.

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

A. Short-Term Uses

The proposed project will involve local short-term uses of the environment during the construction phase of the project. These uses will have both positive and negative impacts. Construction activities associated with the proposed project will create some adverse impacts such as minor disruptions of traffic and increased noise nuisances in the vicinity of the project site.

In the short-term, the project will also confer some positive benefits on the local area. Direct economic benefits may result from construction expenditures both through the purchase of material from local suppliers and through the employment of local labor. Indirect economic impacts may include benefits to local retail businesses through the multiplier effect resulting from construction activities.

While there are no existing plans for alternative uses of this site, development of the project will preclude the site from being used exclusively for educational purposes.

B. Long-Term Productivity

The most significant measure of the long-term productivity of this project is the rental housing units, making more affordable housing available to the people of Hawaii.

The ETO will benefit from a new, modern building, enabling staff and faculty to meet program needs more efficiently to better educate and train students. This in turn will put better vocationally-prepared adults into Hawaii's workforce.

The existing Building 857 will be retained for educational purposes, although specific functions have yet to be determined by the DOE. The park/open space on 1.75 acres of land along Kapiolani Boulevard will serve as an additional recreational resource for the community.

VIII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

This project involves three general categories in the commitment of resources:

A. Long-Term Commitment of Land

Development of the project will involve the long-term commitment of land for attaining housing, educational and recreational objectives. For all practical intents and purposes, the construction of the project is expected to preclude other land use options on the site in the long-term.

Development of the project will probably limit the use of the tower structure to residential uses, although it is conceivable that the tenant mix could be changed by the State in the future. For example, if the need for faculty housing declines, then both towers could be used for general rental housing. Such a change is not foreseeable at this time. Likewise, while ETO will occupy the educational facilities of the project for the foreseeable future, it is conceivable that other educational functions could share the facilities or replace ETO in the long-term.

B. Construction Commitments

A number of resources will be required for completion of the project, including capital, materials, manpower, and energy. These resources will be irretrievably committed to the planning, design and construction of the improvements. Energy and water are other resources which will be required for completion of the project.

C. Operational Commitments

The operation of the completed facilities will also require the expenditure of certain irretrievable and irreversible commitments; labor, materials, and resources (water, electricity and gas) which will be required for effective operation and maintenance.

IX. PROBABLE ADVERSE ENVIRONMENTAL IMPACTS WHICH CANNOT BE AVOIDED

Unavoidable short-term impacts during construction include noise, ground vibration from pile driving and potential traffic and parking inconveniences. Noise during pile-driving will probably exceed the DOE criterion for construction noise in naturally-ventilated classrooms within a 1,000 feet radius and within a 250 radius for air-conditioned classrooms. Although it is intended that pile driving be conducted while school is not in session, this may not be entirely possible. Measures such as pre-drilling to reduce the number of blows required to drive piles, and attenuation such as air conditioning classrooms will be considered to reduce noise impacts during pile driving.

To address concerns that vibration during pile driving will affect nearby structures, *seismographic monitoring* will be conducted during test pile driving to determine appropriate equipment, methods and materials to be used.

Traffic and parking inconveniences will be minimized by coordinating movements of large construction vehicles to avoid peak traffic hours.

Unavoidable long-term impacts of the project will generally be marginal within the context of the on-going redevelopment of Kakaako. Traffic and associated vehicular emissions and noise will increase marginally. The project will contribute to the increasingly high-rise character of the area although identified view corridors will be protected.

The demand for public services, including police and fire protection and recreation, will increase marginally with the increase in population associated with the project. The projected increase in school age children will affect public schools serving the project and needs to be addressed in the context of projected education demands in the schools' respective service area and the DOE plans for accommodating those demands.

Increasing residential development in the vicinity of the high school will increase the likelihood, in the long run, for potential conflicts with the school, particularly as related to school-generated noise. A provision in the rental agreements for residents of Hale Kewalo will apprise tenants that they may be subjected to noise impacts from the high school. While this may not prevent tenants from complaining, it provides the school with an advantage in addressing any complaints. In addition, the DOH rules were changed in 1989 such that complaints against schools are not valid while normal school activities are underway between 7 A.M. and 10 P.M. Toward providing tenants with a means of mitigating potential noise disturbances, the housing units in Hale Kewalo will

be designed to accommodate air conditioning units so that windows can be closed to attenuate noise.

X. CONSULTATION

A. PRE-ASSESSMENT CONSULTATION

State of Hawaii Agencies

Department of Land and Natural Resources; State Historic Preservation Division

City and County Agencies

Board of Water Supply

Department of Public Works

Department of Transportation Services

B. EA CONSULTATION

1. Agencies and Organizations Consulted

State of Hawaii Agencies

Department of Accounting and General Services

Department of Business, Economic Development and Tourism (DBEDT)

DBEDT State Energy Office

Department of Education

Department of Health (DOH)

DOH Environmental Management Division

Department of Land and Natural Resources (DLNR)

DLNR State Historic Preservation Division

Department of Transportation

Office of Environmental Quality Control

Office of State Planning

University of Hawaii (UH)

City and County of Honolulu Agencies

Board of Water Supply

Building Department

Department of Housing and Community Development

Department of General Planning

Department of Land Utilization

Department of Parks and Recreation

Department of Public Works

Department of Transportation Services

Police Department

Others

American Lung Association
GTE Hawaiian Tel
Hawaiian Electric Company

2. Other Respondents

Representative Cynthia Thielen
Mr. Paul Kadooka, et al.
Ms. Gaile A. Sykes
Mr. Rory Gay

C. EISPN CONSULTATION

1. Agencies and Organizations Consulted

State of Hawaii Agencies

Department of Business, Economic Development and Tourism
Department of Education
Department of Health
Department Land and Natural Resources (DLNR)
DLNR State Historic Preservation Division
Office of Environmental Quality Control
UH Finance and Operations

City and County of Honolulu Agencies

Board of Water Supply
Department of Land Utilization
Department of Parks and Recreation
Department of Public Works
Department of Transportation Services
Planning Department

Others

Representative Cynthia Thielen
Mr. Paul Kadooka, et al.
Ms. Gaile A. Sykes
Mr. Rory Gay

2. Other Respondents

Neighborhood Board Nos. 10 and 11
Teachers at McKinley High School (MHS)
Ms. Vanessa Lee (MHS Student Council)
Young Parents Program (MHS)
Ms. Amy Kimura

D. DRAFT EIS CONSULTATION

1. Agencies and Organizations Consulted

Federal Agencies

U.S. Army Corps of Engineers
U.S. Department of Interior Geological Survey
U.S. Navy Pearl Harbor

State of Hawaii Agencies

Department of Accounting and General Services
DBEDT State Energy Office
Department of Defense
Department of Education
Department of Health
DLNR State Historic Preservation Division
Office of Environmental Quality Control
UH Environmental Center

City and County of Honolulu Agencies

Board of Water Supply
Building Department
Department of Land Utilization
Department of Parks and Recreation
Department of Public Works
Planning Department
Police Department

Others

Makiki Neighborhood Board No. 10
McKinley High School (MHS) Student Council
MHS Teachers
Mr. Rory Gay
Mr. Paul Kadooka, et al.
Ms. Amy Kimura
Ms. Gaile A. Sykes

2. **Other Respondents**

Neighborhood Board Nos. 10 and 11
Teachers at McKinley High School (MHS)
Ms. Vanessa Lee (MHS Student Council)
Young Parents Program (MHS)
Ms. Amy Kimura

EARLY CONSULTATION

JOHN WALKER
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 6TH FLOOR
HONOLULU, HAWAII 96813

April 3, 1992

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

SUBJECT: Project Eligibility Application for the Hale Kewalo Planned Development
Project (PE 1-92)
Honolulu, Kona, O'ahu
TMK: 2-3-09: por. 1

Thank you for the opportunity to review this application.

A review of our records shows that McKinley High School (State Site 50-80-14-9926), which is on both the National and State Registers of Historic Places, is also located at this parcel. We believe that this project will have "no effect" on the historic character of site 9926.

The area was formerly marshy, with small ponds, so there is the possibility that wetland deposits are present below the surface, and that these are significant for the information on history and prehistory that they contain. To address this concern and ensure "no adverse effect" to any such deposits, we recommend that excavations occur to determine if wetland deposits are present below the surface, and if so, to collect samples for pollen and dating analyses. Analyses would then need to follow and preparation of an acceptable report. These archaeological excavations could be carried out in conjunction with construction activities and would not impose significant time or financial burdens.

If you have any questions please contact Tom Oye at 587-0014.

Sincerely,

Tom Oye
TOM OYE, Administrator
State Historic Preservation Division

TD:jen

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'92 APR 14 10 20 AM
WILLIAM W. PATY, CHIEF, DIVISION OF LAND AND NATURAL RESOURCES

ADVISORY BOARD
JOHN P. SCHMIDT, CHAIRMAN
DONALD W. HANAU, VICE CHAIRMAN
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CONSERVATION AND RESOURCES DEPARTMENT
FORESTRY AND WILDLIFE RESTORATION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

LOG NO: 4580
DOC NO: 0588T

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU
630 SOUTH BERTANA STREET
HONOLULU, HAWAII 96843



February 19, 1992

Mr. Michael N. Scarfone
Executive Director
Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard,
Suite 1001
Honolulu, Hawaii 96813

Attention: Eric J. Masutomi

Dear Mr. Scarfone:

Subject: Your Letter of January 31, 1992 on Project Eligibility Application for the Hale Kewalo Planned Development Project. TMK: 2-3-09: 1

The existing water system is presently adequate to accommodate the proposed Hale Kewalo planned development. The developer is required to obtain a water allocation from the State Department of Land and Natural Resources.

The availability of water will be confirmed when the building permit is submitted for our review and approval. When water is made available, the developer is required to pay our Water System Facilities Charges for transmission and daily storage. If a three-inch or larger meter is required, construction plans are required for our review and approval.

If you have any questions, please contact Albert Koga at 527-6123.

Very truly yours,

Kazu Hayashida
FOR KAZU HAYASHIDA
Manager and Chief Engineer

Board of Water Supply

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'92 FEB 25 AM 10 18
CITY AND COUNTY OF HONOLULU

FRANK FASH, Mayor
WALTER WATSON, Jr., Chairman
MAURICE H. YAMASATO, Vice Chairman
JOHN W. ANDERSON, Jr.
SAM CALLEJO
R. D. JOHNSON
MELISSA J. LUM
KAZU HAYASHIDA
Manager and Chief Engineer

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

RECEIVED

APR 19 1992



C. MICHAEL STREET
ACTING DIRECTOR AND CHIEF ENGINEER

92-14-0196

March 16, 1992

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
Suite 1001
677 Ala Moana Boulevard
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Your Letter PE 1-92 of January 31, 1992 Relating to a Project Eligibility Review for Hale Kewalo Planned Development Project, Tax Map Key: 2-3-09: Por. 1

We have reviewed the proposed project and have the following comments:

Engineering:

Street improvements shall be in accordance with City standards. (Contact Faith Kunimoto, 527-5084.)

Refuse Collection:

We believe that because this is a University of Hawaii project, the State of Hawaii will take care of the refuse collection needs.

Sanitary Sewers:

We have no objections to the overall concept of the proposed Hale Kewalo Planned Development project.

Mr. Eric J. Masutomi
March 16, 1992
Page 2

However, please be informed that although we have no objections to the proposed project at this time since existing municipal sewers in the area are available, this shall not be construed as a confirmation of the adequacy of the existing sewer system to support the proposed wastewater flow requirements. A determination of sewer adequacy is contingent upon the approval of an "Application for Sewer Connection" form by the Division of Wastewater Management. The application submitted for the proposed project is currently being reviewed by WWM.

Also, please be informed that a Wastewater System Facilities charge is applicable for the proposed project. (Contact Lynn Kurashima, 523-4671.)

Michael T. Fujigawa
for C. MICHAEL STREET
Acting Director and Chief Engineer

D. DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU FEB 3 AM 10 12
HONOLULU MUNICIPAL BUILDING
430 SOUTH KING STREET
HONOLULU HAWAII 96813



Mr. Eric J. Masutomi
Page 2
February 26, 1992

Should you have any questions, please contact Lance Watanabe of my staff at 523-4199.

TE-0477
TE-0560
PL92.1.037
PL92.1.041

February 26, 1992

Sincerely,

JOSEPH M. MAGALDI, JR.
Director

cc: Imata & Associates, Inc.

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Hale Kewalo Planned Development Project
UH Kakaako Project
Project Eligibility Application
TMK: 2-3-09: Portion 1

This is in response to your letter of January 31, 1992 requesting our comments on the proposed development.

Based on our review, we have the following concerns:

1. All vehicular access points should be constructed as standard city dropped driveways. Existing driveways along the project's frontage, which will not be used by this development, should be adjusted to match the standard curb grade.
2. The minimum vertical clearances from floor to floor and from floor to overhead obstruction should be 9 feet and 7 feet, respectively.
3. Preliminary construction plans for off-site improvement work and driveway locations which may affect traffic circulation should be submitted for our review and approval prior to the processing of building permit applications.
4. A traffic study should be prepared as part of the Environmental Assessment.

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DRAFT EA CONSULTATION



DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
 DIVISION OF PUBLIC WORKS
 P. O. BOX 111, HONOLULU, HAWAII 96810

RUSSEL S. HAGAIA
 Controller
 ROBERT P. LAUGHER
 Deputy Controller

LETTER NO. (P)1803.2

OCT 27 1992

Housing Finance and Development Corporation
 State of Hawaii
 Seven Waterfront Plaza, Suite 300
 505 Ala Moana Boulevard
 Honolulu, Hawaii 96813

Attention: Mr. Harold Edwards
 Gentlemen:

Subject: Hale Kewalo Rental Housing Development
 Honolulu, Oahu, Hawaii
 Draft Environmental Assessment

Thank you for the opportunity to review the subject document. We have no comments to offer.

Should there be any questions, please have your staff contact Mr. Ralph Yukumoto of the Planning Branch at 586-0488.

Very truly yours,

 GORDON MATSUOKA
 State Public Works Engineer

RY:jk
 cc: OEQC
 Wilson Okamoto & Associates, Inc.



DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES



KAKAIAKO
 1000 Kalia Road, Honolulu, HI 96813

John D. Walker
 Director

Carly Cashfield
 Assistant Director

Michael N. Suttner
 Executive Director

Mr. Al Ahana, HFDC
 Mr. Earl Matsuoka, WOA

3149-01

October 27, 1992

Mr. Gordon Matsuoka
 Staff Services Branch Chief
 Public Works Division
 Department of Accounting and General Services
 P.O. Box 119
 Honolulu, Hawaii 96810

Dear Mr. Matsuoka:

Re: Hale Kewalo Rental Housing Development
 Draft Environmental Assessment
 Tax Map Key: 2-3-09:1
 Honolulu, Oahu, Hawaii

Thank you for your letter of September 15, 1992 indicating that you have no comment on the subject Environmental Assessment/Negative Declaration Anticipated. Your letter will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards
 Development Director

cc: Mr. Al Ahana, HFDC
 Mr. Earl Matsuoka, WOA

October 27, 1992

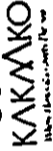
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

ENERGY DIVISION, 333 MERCHANT ST., RM. 110 HONOLULU, HAWAII 96813 PHONE: (808) 587-3400 FAX: (808) 587-3420

- JOHN WAIKANE Governor
- MAUI HARRISMANA Director
- SABARA KIM STANSON Deputy Director
- BICKI EGGED Deputy Director
- IAESUM YOSHIMURA Deputy Director



Mr. Maurice H. Kaya
 Energy Program Administrator
 Energy Division
 Department of Business,
 Economic Development & Tourism
 State of Hawaii
 Room 110
 335 Merchant Street
 Honolulu, Hawaii 96813



September 23, 1992

92:1148e

Dear Mr. Kaya:

Mr. Harold Edwards
 Housing, Finance and
 Development Corporation
 677 Queen Street, Suite 300
 Honolulu, Hawaii 96813

Mr. D. Walker

Carl Campbell

Michael N. Sautter

Re: Hale Kewalo Rental Housing Development
 Draft Environmental Assessment
 Tax Map Key: 2-3-09:1
 Honolulu, Oahu, Hawaii

Dear Mr. Edwards:

Hale Kewalo Rental Housing Development
 Draft Environmental Assessment (Draft EA)
 Tax Map Key: 2-3-09:1, Honolulu, Oahu, Hawaii

Thank you for the opportunity to comment on the Draft Environmental Assessment. The project is a proposed rental housing structure with parking and training facility. A total of 530 rental apartments are provided. The project is located in the north-west corner of Pensacola Street and Kapiolani Boulevard.

Should it be determined that an Environmental Impact Statement is required, then it should comply with the requirements found in State laws for evaluating any energy impacts that the project will have. The mandate for such an evaluation is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226, HRS ("Hawaii State Planning Act"). In particular Chapter 226-18 (a) (2) and (c) (3); 226-52 (a) and (b) (2) (D); and 226-103 (f) (1) and (2) should be considered.

As there may be substantial energy impact from this project, we would recommend that you consider efficient energy-saving technologies which can be used in the facility's air conditioning, water heating, and lighting systems. High efficiency motors and chillers, a heat recovery system, and energy-saving metal halide and fluorescent lamps and ballasts are also among items to be considered.

We would also like to bring the developer's attention to the possibility that the utilities will be implementing demand-side management (DSM) programs for new construction in the near future which may have a direct impact on the project.

Sincerely,

 Maurice H. Kaya
 Energy Program Administrator

HHK/LU:dkik
 cc: Wilson, Okamoto & Associates, Inc.
 DEQC

Thank you for your letter of September 23, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated.

The HCDA has an economic and environmental interest in efficient energy usage. The "Energy Efficiency Design Guidelines" have been forwarded to the project designers for their consideration, and specific requirements are being determined. We shall take into account the possibility that the utilities will be implementing demand-side management (DSM) programs for new construction projects such as this one.

At present, various energy conservation and efficiency measures are being implemented in the design of the proposed project. The building will utilize almost exclusively energy saving T8 fluorescent lamps with electronic ballasts, compact fluorescent lamps and high pressure sodium lamps which will result in a considerable energy savings over conventional sources, mechanically, high efficiency motors will be used, all A/C equipment and water heaters conform to the building code and energy factor code of the federal regulations respectively.

Your letter and this response will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

 Harold Edwards
 Development Director

cc: Mr. Al Ahana, HFDC
 Mr. Earl Matsukawa, WOA

Mr. Maurice H. Kaya
 Energy Program Administrator
 333 Merchant Street, Room 110
 Honolulu, Hawaii 96813
 Telephone: (808) 587-3400
 Fax: (808) 587-3420



STATE OF HAWAII
DEPARTMENT OF EDUCATION

P. O. BOX 2289
HONOLULU, HAWAII 96813

OFFICE OF THE SUPERINTENDENT

September 4, 1992

Mr. Harold Edwards -2- September 4, 1992

2. We strongly disagree with the summary statement that no significant impacts are anticipated. The projected enrollment growth from the two towers are as follows:

School	Grades	Projected Students
Kaahumanu Elementary	K-5	95
Central Intermediate	6-8	32
McKinley High School	9-12	42

Kaahumanu Elementary and McKinley High Schools are both operating beyond capacity. There is no room to add additional classrooms at the Kaahumanu Elementary School campus. The school would be severely overcrowded and no school is located nearby to accommodate the excess enrollment.

3. All of the schools in the complex will be greatly affected by numerous developments in the Kakaako Redevelopment area. There is no feasible elementary school site to develop in the Kakaako area. The Pohukaina site is too small to develop and lease commitments forestall use of the site. Hence, the former community college site could be a location for the elementary school site or expansion of the high school facilities. Page 22 of the draft states the educational needs of the DOE under objective A (4).

4. McKinley High School is projected to increase by 285 students in 1997 over the 1991 enrollment of 2,094 students. Additional enrollment at a large school makes a great impact on the school program.

5. Traffic created by the occupants of the towers will create great congestion near the school parking lot entrance.

6. Wherever high rise buildings and housing are located adjacent to high school sites, complaints originate regarding the alleged noise generated by extracurricular activities on the campus. The school programs are impacted by the proximity of housing units.

7. The draft does not adequately address the impact of the project on schools. There is no reference to the enrollment impact on schools in the area and no mitigation measures. The single sentence acknowledging the increased demand on public facilities due to the population increase does not adequately address the impact of the project.

Mr. Harold Edwards
Project Coordinator
Housing Finance and
Development Corporation
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Dear Mr. Edwards:

SUBJECT: Hale Kewalo Rental Housing Development
Draft Environmental Assessment (Draft EA)
Honolulu, Oahu, Hawaii
THK: 2-3-92

We have reviewed the subject draft for the proposed development on the former Kapiolani Community College site and have the following comments to make:

1. The Department of Education (DOE) opposes the development because we have not given prior written approval to withdraw the land from Executive Order No. 101 for McKinley High School or to convey the land to the University of Hawaii (UH) or the Housing Community Development Authority (HCDA). Our previous agreement with the UH and HCDA to accept a portion of land (Building 857) has been withdrawn by the Board of Education. The DOE believes we are entitled to manage the property until such time as we believe it will no longer serve an educational purpose.

The DOE is not opposed to building housing and recognizes the community's need for the construction of additional units. However, we believe that we should have the first opportunity to use the site which may be the last available land in Kakaako for school purposes.

Mr. Harold Edwards

-3-

September 4, 1992

Should this project ever legally proceed despite our objections, the DOE believes that the stated use of Building 857 and identification of 50 parking stalls reserved for McKinley High School is a reasonable minimum part of the project. In addition, fair-share contributions by the developer should be made to build facilities required to accommodate the projected enrollment growth of 169 students to the satisfaction of the DOE.

Should there be any questions regarding our response, please call the Facilities Branch at 737-4743.

Sincerely,

Charles T. Toguchi

Charles T. Toguchi
Superintendent

CTT:hy

cc: A. Suga
J. Kim
OEQC
Wilson, Okamoto & Assoc., Inc.



DEPARTMENT OF EDUCATION



Man U Walker

Carl C. Caldwell

Michael N. Scarsone

3149-01

October 27, 1992

Mr. Charles T. Toguchi
Superintendent
Department of Education
P. O. Box 2360
Honolulu, Hawaii 96804

Dear Mr. Toguchi:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 4, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

1. We acknowledge the DOE's desire to retain control over use of the project site. Our understanding, however, is that the question of control was resolved when the Governor conveyed the site to the HCDA by Executive Order No. 8567 pursuant to Chapter 206-EB, Hawaii Revised Statutes, which superseded Executive Order No. 101. With respect to the proposed mixed-use project, the HCDA finds that the site is uniquely suited to addressing a broad range of needs, not least of which is education, as elaborated upon in our response No. 364, below.

2. The current student enrollment projections prepared by your Department include the marginal increase in demand that will be generated by the proposed Hale Kewalo development. Based on our discussions with DOE officials we understand that while the forecasts indicate an additional strain on existing schools as a result of overall future development in Kakaoko, including the proposed project, the DOE has not concluded that additional schools will be required. We will clarify this point in the Final EA.

We also note a discrepancy between the projected enrollment for the Hale Kewalo facility provided in your letter and the

Mr. Charles T. Toguchi
Superintendent
Department of Education
P. O. Box 2360
Honolulu, Hawaii 96804

3149-01
Mr. Charles T. Toguchi
Page 2
October 27, 1992

latest projections provided by your Department in our continuing discussions. While this discrepancy should be resolved, it appears to be relatively minor and well within the range of the marginal impact the proposed project will have on the school system.

384. The HCDA continues to meet with DOE officials regarding the impact of redevelopment in Kakaako on the school system. The proposed project in itself, however, only has a marginal impact on the system.

The HCDA acknowledges the DOE's desire to reserve the project site for indefinite educational facility needs. The HCDA's Mauka Area Plan also acknowledges the potential value of the site for educational purposes. The HCDA, however, is committed to achieving the range of objectives and policies stated in the Plan. Hence, the proposed mixed-use of the site for housing and recreation, as well as education activities, serves to ensure that this valuable public resource is most effectively utilized to address the broadest range of public needs. Toward addressing educational uses, the project includes the new ETO Building 857 on the site for educational purposes. The University of Hawaii is served by the faculty housing tower. Recreation is addressed through the creation of approximately 1-3/4 acres of park/open space along Kapiolani Boulevard.

5. Traffic impacts of the proposed project have been assessed in a traffic study prepared for and included in the EA. The traffic impacts of the proposed project on the McKinley High School parking lot entrance will be minimized by prohibition of street parking on the east side of Pensacola Street near the project. The removal of parked

3149-01
Mr. Charles T. Toguchi
Page 3
October 27, 1992

cars will improve lines of sight and provide a longer queuing lane for vehicles turning right on Kapiolani Boulevard, thereby reducing the potential for congestion near the high school's driveway entrance.

6. The State Department of Health (DOH) administers community noise standards for Oahu (Title 11, Chapter 43-3, Administrative Rules, DOH). As residential and other noise-sensitive developments have occurred near locations where noise producing activities take place, the DOH has been called upon to enforce those standards. Inasmuch as the Diamond Head side of Pensacola Street between King and Kapiolani is designated almost entirely for residential mixed-use development on the HCDA's Mauka Area Plan, the potential for enforcement of noise standards at some point in the future is significant.

We do not believe that creating a situation where an existing environmental standard may be enforced can be considered an adverse environmental or social impact of the proposed project. If certain noise-producing activities are identified as having a net social benefit, then the appropriate course of action is to seek modification of the DOH rules to allow such activities.

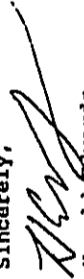
7. Please refer to our response No. 2.

We appreciate your acknowledgement of the HCDA's effort to address education in the proposed mixed-use Hale Kewalo facility. Our response Nos. 3&4 identifies other aspects of the project benefitting education. Any additional measures, such as fair-share contributions to build education facilities, will need to be discussed in detail with respect to how DOE will be addressing its future enrollment projections. We look forward to our continuing discussions with your Department.

3149-01
Mr. Charles T. Toguchi
Page 4
October 27, 1992

We hope that we have adequately responded to your comments. Your letter, together with this response, will be reproduced in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Harold Edwards
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA





STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P.O. BOX 151
HONOLULU, HAWAII 96810

WILLIAM W. PATY, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
DEPUTY
JAMES P. LEPPELLER, JR.
COMPTROLLER
AGRICULTURE DEVELOPMENT
PROGRAM
NATIVE RESOURCES
DEPARTMENT
CONSERVATION AND RECREATION
DEPARTMENT
HISTORIC PRESERVATION PROGRAM
STATE AND LAND DEVELOPMENT
DIVISION

FILE NO.: 93-131
DOC. ID.: 1458

SEP 23 1992

MEMORANDUM

TO: The Honorable Joseph Conant, Executive Director
Housing Finance and Development Corporation
Department of Budget and Finance

ATTN: Mr. Harold Edwards

FROM: William W. Paty, Chairperson
Board of Land and Natural Resources

SUBJECT: Hale Kewalo Rental Housing Development Draft Environmental
Assessment, Honolulu, Hawaii, TMK: 2-3-09: 1

Thank you for giving our Department the opportunity to comment on this
environmental assessment. We have reviewed the materials you submitted
and have the following comments.

Historic Preservation Division Comments:

In April 1992 we commented on a Project Eligibility Application for this
project to Mr. Eric J. Masutomi, Director of Planning, Hawaii Community
Development Authority as follows:

A review of our records shows that McKinley High School
(State Site 50-80-14-9926), which is on both the
National and State Registers of Historic Places, is also
located at this parcel. We believe that this project
will have "no effect" on the historic character of site
9926.

The area was formerly marshy, with small ponds, so there is
the possibility that wetland deposits are present below the
surface, and that these are significant for the information
on history and prehistory that they contain. To address this
concern and ensure "no adverse effect" to any such deposits,
we recommend that excavations occur to determine if wetland
deposits are present below the surface, and if so, to collect
samples for pollen and dating analyses. Analyses would then
need to follow and preparation of an acceptable report.

Memo to J. Conant

-2-

File No.: 93-131

The DEA contains as Appendix B an Archaeological Assessment of a 5.33
Acre Parcel in the Kapi'olani Business District by Chigioji and Hamatt,
Cultural Surveys Hawaii. This report documents the natural environment
of the area prior to urbanization and Hawaiian use of the environment for
salt-making, fishponds and irrigated agriculture. The report recommends
subsurface test excavations following demolition of existing structures
and before initiation of construction to determine if subsurface wetland
deposits are extant and to collect appropriate pollen and charcoal
samples for analysis. We concur with these recommendations.

Thank you for your cooperation in this matter. Please feel free to call
Tom Dye of Historic Sites at 587-0014, or Sam Lemmo at our Office of
Conservation and Environmental Affairs, at 587-0377, should you have any
questions.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKA'Ō
KAWAHAU

John D. Walker
Director

Carin Caulfield
Assistant Director

Michael N. Scarnice
Assistant Director

3149-01

October 27, 1992

The Honorable William W. Paty
Chairman
Department of Land and
Natural Resources
Room 130
1151 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Paty:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 23, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. The status of McKinley High School on the National and State Registers of Historic Places and the "no effect" finding will be incorporated in the Final Environmental Assessment. We appreciate your concurrence on the findings and recommendations of the archaeology study. Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

77 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii 96813
Telephone: (808) 551-2500
Telex: 15454
Fax: (808) 551-2511





DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKAIAKO
HONOLULU, HAWAII

John D. Walker
Director

Cary Caulfield
Assistant Director

Michael N. Scavone
Assistant Director

3149-01

October 27, 1992

Mr. Don J. Hibbard
Administrator
State Historic
Preservation Division
Department of Land and
Natural Resources
6th Floor
33 South King Street
Honolulu, Hawaii 96813

Dear Mr. Hibbard:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 18, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. The status of McKinley High School on the National and State Registers of Historic Places and the "no effect" finding will be incorporated in the Final Environmental Assessment. We appreciate your concurrence on the findings and recommendations of the archaeology study. Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

STATE OF HAWAII
HONOLULU, HAWAII
1992 OCT 27 10 54 AM
MAIL ROOM

JOHN WARD
GOVERNOR



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

SEP 22 1992

READ JOHNSON
DIRECTOR
DEPUTY DIRECTORS
JOYCE T OAHNE
AL PANG
JEANNE K SCHWARTZ
CALVIN H TSUDA
BY REPLY REFER TO

HWY-PS
2-3761



HAWAIIAN
DEPARTMENT OF
TRANSPORTATION




KAKAWAO
Hawaiian Cultural Center, Inc.

John D. Walker
Director

Cary Campbell
Assistant Director

Mahua N. Sutherland
Assistant Director

TO: Harold Edwards
Housing Finance and Development Corporation

FROM:  Rex D. Johnson, Director
Department of Transportation

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT, HALE KEWALO RENTAL HOUSING DEVELOPMENT, HONOLULU, OAHU, THK: 2-3-09: 01

Thank you for your letter of August 12, 1992, requesting our review of the subject proposed project.

We do not anticipate this proposed project to significantly affect the State Highway System.

C: Brian J.J. Choy
OEQC
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Earl Matsukawa
Wilson Okamoto & Associates, Inc.
P.O. Box 3530
Honolulu, Hawaii 96814

3149-01

October 27, 1992

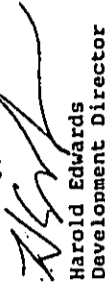
The Honorable Rex D. Johnson
Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Johnson:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 22, 1992 indicating that you have no comments on the subject Environmental Assessment/Negative Declaration Anticipated. Your letter will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Harold Edwards
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

67 W. Maunaloa Blvd. and
Kalihi Road
Honolulu, Hawaii
96813
Telephone
(808) 947-2570
Facsimile
(808) 947-2611

October 27, 1992

The Honorable Brian J. J. Choy
Director
Office of Environmental
Quality Control
State of Hawaii
4th Floor
220 South King Street
Honolulu, Hawaii 96813

Dear Mr. Choy:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of August 25, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following in response to your comments:

While the proposed project is large in size, its impacts are relatively insignificant within the context of the proposed redevelopment of the Kakaako area which was assessed in the Final Environmental Impact Statement for the Kakaako Community Development District Plan, filed in June 1993. The project itself was not included in that EIS.

With respect to the benefit that an EIS would have in assuring that impacts are disclosed, you will note that the subject EA is prepared following an EIS format. Moreover, the current review process for environmental assessments assures that agencies and the general public are afforded greater opportunity than in the past to identify any significant impacts. We feel that this revised process allows for more streamlined review of projects, such as this, which may be large but have relatively insignificant impact.

Disclosure of potential traffic and noise impacts was made in the Draft EA. The traffic study, completed by Wilbur Smith Associates, and reproduced in the Draft EA, states that the key intersections (Pilikoi, Pensacola, Kapiolani) impacted by the project are expected to operate at acceptable levels of service. Noise impacts of the project are typical for urban settings. All residents of the housing development will be apprised in their rental agreements that they may be exposed to noise from the



John D. Walker
Director

Cary Caulfield
Assistant Director

Michael V. Sullivan
Assistant Director

Mr. Brian J. Choy
Director
Office of Environmental
Quality Control
4th Floor
220 South King Street
Honolulu, Hawaii 96813

Brian J. Choy
Director



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
220 SOUTH KING STREET
FOURTH FLOOR
HONOLULU, HAWAII 96813
TELEPHONE 552-3441
AUGUST 25, 1992

Mr. Harold Edwards, Director of Development
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Edwards:

Subject: Draft Environmental Assessment for the Hale Kewalo Rental Housing Development, Honolulu, Oahu

The Office of Environmental Quality Control cannot override your agency's anticipated decision to make the determination that the subject project will have no significant impact.

However, the proposed project is large in size and may have substantial effects on adjacent public facilities. Therefore, we believe that the preparation of an environmental impact statement (EIS) would ensure that all affected parties would be adequately consulted with. In addition, an EIS would assure that all potential impacts would be sufficiently disclosed.

History has shown that large residential projects adjacent to existing schools such as McKinley High School have later led to traffic and noise related complaints against the school. School activities such as athletics, marching band practices, outdoor rallies, and carnivals will generate traffic and noise complaints from adjacent residents such as the proposed project. In addition, the subject site is host to other annual activities such as the State Farm Fair and political rallies and relatively close to the Neal Blaisdell Center.

If you have any questions, please call Jayan Thirugnanam at 586-4185.

Sincerely,

Brian J. Choy
Brian J. J. Choy
Director


c: Mr. Al Ahana, HFDC

3149-01
The Honorable Brian J. J. Choy
Page 2
October 27, 1992

school and activities such as athletics, marching band practices, outdoor rallies and carnivals. In addition, all residential units will be designed to accommodate air conditioners which will allow windows to be closed, thus providing substantial noise attenuation.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be reproduced in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HOA

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



September 30, 1992

Mr. Michael N. Scarfone
Executive Director
Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Mr. Michael N. Scarfone
Executive Director
Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813



Mr. Michael N. Scarfone
Page 2
September 30, 1992

Mr. Michael N. Scarfone
Executive Director
Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Attention: Mr. Harold Edwards

Dear Mr. Scarfone:

Subject: Your Letter of August 12, 1992 Regarding the Draft Environmental Assessment (DEA) for the Proposed Hale Kewalo Rental Housing Development. TMK: 2-3-09: 1, Pensacola Street and Kapiolani Boulevard

Thank you for the opportunity to review and comment on the proposed Hale Kewalo project. We have the following comments to offer:

1. The existing water system is presently adequate to accommodate the proposed project. There are two water services currently serving the project site. As stated in the DEA, the developer will be required to obtain a water allocation from the Department of Land and Natural Resources.
2. The availability of additional water will be confirmed when the building permit is submitted for our review and approval. When additional water is made available, the applicant will be required to pay our Water System Facilities Charges for transmission and daily storage and any applicable meter installation charges.
3. If a three-inch or larger meter is required, the construction drawings showing the installation of the meter should be submitted for our review and approval.

4. Board of Water Supply approved reduced pressure principle backflow prevention assemblies should be installed on the domestic water lines immediately after the property valve and prior to any branch piping.

If you have any questions, please contact Bert Kuiuoka at 527-5235.

Very truly yours,

KAZU HAYASHIDA
Manager and Chief Engineer

cc: Office of Environmental Quality Control
Wilson Okamoto & Associates



DEPARTMENT OF WATER SUPPLY



KAKA'IKO
Water Treatment Center for the State

John D. Wahner
Executive Director

Gary Caulfield
Assistant Director

Michael S. Siskine
Assistant Director

3149-01

October 27, 1992

The Honorable Kazu Hayashida
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 30, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We appreciate your verification that the existing water distribution system is presently adequate to accommodate the proposed project. We will comply with all requirements and recommendations stated in your letter, including the requirement to obtain a water allocation from DLNR.

Your letter and this response will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

827 Ala Moana Boulevard
Honolulu, HI 96813
Telephone: (808) 551-2500
Fax: (808) 551-2501
Date: 10/27/92

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, 5TH FLOOR
HONOLULU, HAWAII 96813
PHONE: (808) 523-2627 FAX: (808) 523-2498



E. JAMES TURSE
DIRECTOR
GAIL M. BARTO
DEPUTY DIRECTOR

September 18, 1992

Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Attention: Mr. Harold Edwards

Gentlemen:

Subject: Draft Environmental Assessment
Hale Kewalo Rental Housing Development

The Department has reviewed the subject Draft Environmental Assessment and has no comments to offer at this time.

Thank you for the opportunity to comment.

Sincerely,

E. JAMES TURSE
Director

cc: OEQC
Wilson Okamoto & Associates, Inc.



HONOLULU
HAWAII 96813



John D. Walker
Director

Gary Caldwell
Assistant Director

Michael A. Squire
Assistant Director

3149-01

October 27, 1992

The Honorable E. James Turse
Director
Department of Housing
and Community Development
City and County of Honolulu
5th Floor King Street
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Turse:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 18, 1992 indicating that you have no comments on the subject Environmental Assessment/Negative Declaration Anticipated. Your letter will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

Mr. Wilson Okamoto
Suite 300
677 Queen Street
Honolulu, Hawaii
96813
Telephone
(808) 523-2627
Fax
(808) 523-2498

DEPARTMENT OF GENERAL PLANNING
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET
HONOLULU, HAWAII 96813



BENJAMIN B. LEE
CHIEF PLANNING OFFICER
ROLAND LIBBY, JR.
DEPARTMENT PLANNING OFFICER

TH 8/92-2510

October 2, 1992

Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Attention: Mr. Harold Edwards
Gentlemen:

Hale Kewalo Rental Housing Development
Draft Environmental Assessment (DEA)
Tax Map Key: 2-3-99: 1. Honolulu, Oahu, Hawaii

In response to your letter of August 12, 1992, we have reviewed the subject DEA and offer the following comments:

1. The project site is designated "Public Facility" on the Primary Urban Center Development Plan Public Facilities Map, Ordinance 81-79, as amended.
2. Since the proposed project is located in the Kakaako Special Design District, planning and design efforts should try to preserve mauka-makai views of Punchbowl from Kakaako. The Development Plan Special Provisions for the Primary Urban Center, Section 24-2.2(6)(C) & (E) Urban Design Principles & Controls for Kakaako, states that:
(C) (i) - 60' for the area occupied by Neal Blaisdell Center, McKinley High School & Kapiolani Community College;
(E) - In addition to the above, special height, design and use controls may be applied when necessary to ensure the preservation of important views, landmarks and historic structures, and the compatibility of the permitted mixture of uses within the area.

Housing Finance and Development Corporation
October 2, 1992
Page 2

In general, we are concerned with the design of numerous buildings recently completed in Kakaako which use reflective glass. We would prefer to see the use of overhangs, eyebrows and lanais as a preferred design alternative in creating energy efficient buildings.

3. The Environmental Assessment should include the Fire Department and the Ala Moana/Kakaako Neighborhood Board No. 11 as consulted parties for this project.
4. The Environmental Assessment should discuss how the proposed project will impact the future educational needs and school enrollment of McKinley High School. According to our 1992 Development Plan Status Review, approximately 6,300 housing units are expected to be developed in Kakaako within the next seven years. Such a population increase would directly impact McKinley High School and could result in a future need to expand school facilities. How will increased school enrollment at McKinley High School be accommodated? Would this project limit needed expansion of McKinley High School?
5. The Environmental Assessment should provide a more detailed discussion about the proposed project's impact on parking as discussed in the Hawaii Community Development Authority's Mauka Area Rules for the Kakaako Community Development District (February 1990).
6. The Environmental Assessment should discuss in greater detail how the open space along the Kapiolani Boulevard side of the project site is to be used (i.e., will the open space be for public or private use?).

We recommend that an Environmental Impact Statement be prepared to fully address traffic, design and infrastructure impacts as well as the project's impacts on McKinley High School.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Tim Hata of our staff at 527-6070.

Sincerely,

BENJAMIN B. LEE
Chief Planning Officer

BBL:ft



DEPARTMENT OF
ENVIRONMENT AND
NATURAL RESOURCES



KAKAOKO
1100 Kakaako Avenue, Honolulu, HI 96813

John D. Walker
Director

Gary C. Caldwell
Assistant Director

Michael S. Sisk
Assistant Director

3149-01

October 27, 1992

The Honorable Benjamin B. Lee
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Lee:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-J-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of October 2, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

1&2. As noted in the EA, the project site is located within the Kakaako Community Development District and is subject to provisions set forth in the State's Mauka Area Plan and Rules as established by the Hawaii Community Development Authority pursuant to Section 206-E, Hawaii Revised Statutes.

3. Although the subject EA was not distributed directly to the parties suggested in your letter, it was filed with the Office of Environmental Quality Control (OEQC) as an Environmental Assessment/Negative Declaration Anticipated pursuant to new procedures established by Act 241, SLH 1992. The new procedures offer significantly greater opportunity for agencies and the public to review the Draft EA since notification of its availability for the 30-day review is published in the OEQC Bulletin.

4. Toward assuring that public educational facilities will meet future demands of development in the Kakaako area, the HCDA continues to review and discuss student

3149-01
The Honorable Benjamin B. Lee
Page 2
October 27, 1992

enrollment projections with DOE officials. The current projections prepared by DOE include the marginal increase in demand that will be generated by the proposed Hale Kewalo development. While the forecasts indicate that additional strain will be placed on existing schools, the DOE has not concluded that additional schools will be required.

Currently, the Department of Education has no formal plans for the site. It is our understanding that the DOE has been considering alternative uses, including an elementary school and expansion of the high school, although current enrollment projections have not concluded that such facilities are needed in the foreseeable future.

5. The proposed project meets all parking requirements as contained in the HCDA's Mauka Area Rules for the Kakaako Community Development District.

6. The proposed 1-3/4 acre park/open space along Kapiolani Boulevard is intended to serve as a recreational resource for the community. Potential use of the park may range from an extension of the McKinley High School athletic field to a public park with parking available on weekends in the adjoining ETO parking lot along Pensacola Street. The park could also be dedicated to the City for general public use. Future alternatives for facilities could range from those serving high school athletics to active public recreational facilities such as courts and playing fields, to passive landscaped open space. Discussions on the use of the park/open space will be pursued with McKinley High School and the City Department of Parks and Recreation, as appropriate.

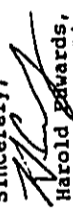
Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your

cc: Mr. Leonard B. ...
cc: Mr. ...
cc: Mr. ...
cc: Mr. ...
cc: Mr. ...

3149-01
The Honorable Benjamin B. Lee
Page 3
October 27, 1992

interest and participation in the consultation phase of the
environmental review process.

Sincerely,


Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU

830 SOUTH KING STREET
HONOLULU, HAWAII 96813 • (808) 532-4432



FRANK E. FASH
DIRECTOR

DONALDA CLEGG
DIRECTOR

LORETTA C. CHIE
DEPUTY DIRECTOR

(ASK)

Mr. Harold Edwards
Page 2

September 25, 1992

Mr. Harold Edwards
Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Edwards:

Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1

We have reviewed the Draft Environmental Assessment (EA) and offer the following comments:

1. The Final EA should describe how parking demands will be met. According to information provided in the Traffic Study, a total of 569 spaces will be allocated to 529 apartment units. This may be inadequate and could result in an increased demand for on street parking.
2. The labels for Table 3-1 of the Traffic Study are confusing. Perhaps "unit" should read "type of unit" and "number of units" should be substituted for "size".
3. The Final EA should provide some discussion of whether State air quality standards are being met and how the proposal will impact air quality.
4. Page 32 of the Draft EA states that "open space proposed along the Kapiolani Boulevard frontage and landscaping throughout the site will create attractive visual atmosphere." The Final EA should describe impacts to mauka-makai views. We are concerned that these structures may negatively impact important view corridors.
5. The heights of the individual structures should be identified.

6. In our opinion, the magnitude of the project may result in significant environmental impacts and preparation of an Environmental Impact Statement is recommended.

We appreciate the opportunity to review and comment on the Draft EA. Should you have questions regarding the above, please contact Ardis Shaw-Kim of our staff at 527-5349.

Very truly yours,

DONALD A. CLEGG
Director of Land Utilization

DAC:ask

CC: OEQC
Wilson Okamoto & Associates, Inc.



STATE OF HAWAII



KAKAOKO
HAWAIIAN COMMUNITY DEVELOPMENT

John D. Waihele
Director

Carly Caulfield
Assistant Director

Michael N. Scaturro
Assistant Director

3149-01

October 27, 1992

The Honorable Donald A. Clegg
Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 25, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

1. The central location of the proposed project offers numerous transit opportunities to future residents of the Hale Kewalo Rental Housing Development, and is one of the benefits that makes this site attractive for accommodating affordable housing. Moreover, auto ownership rates for the future residents is anticipated to be lower than for market-priced housing.
2. The tables in the traffic study have been relabeled in the Final EA according to your suggestion.
3. The Kapiolani Boulevard and Pensacola Street intersection is among the busier intersections in Honolulu. Previously prepared computer-modeled air quality studies suggest that carbon monoxide levels immediately adjacent to the City's busiest intersections, such as Kapiolani Boulevard and Kalakaua Avenue, may exceed state air quality standards (but are well within National standards) when peak traffic hours coincide with the breakdown of winds. Such wind conditions, when speeds drop to one meter per second or less, however, are rare and may occur only once a year. Even a wind speed of two meters per second would halve

cc: Mr. Michael Scaturro
Carly Caulfield
John D. Waihele
October 27, 1992

3149-01
The Honorable Donald A. Clegg
Page 2
October 27, 1992

CO concentrations, keeping levels within State standards.

Air quality is also dependent upon the quality of emissions from vehicles. Due to government-mandated emission control on newer vehicles, they are significantly less polluting than older vehicles. As older, vehicles are retired from service, air-pollution is reduced. In many cases, computer-modeled air quality studies indicate that air quality will improve in spite of significant increases in traffic.

The proposed project is anticipated to increase peak hour traffic in the vicinity by approximately four percent, which is a marginal increase. With the proposed prohibition on parking on the Ewa side of Pensacola Street near the project, future traffic with the project will only increase the delay time at the Pensacola/Kapiolani intersection by two seconds. Delay time is a concern with respect to air quality since the longer cars are left to idle at an intersection, the more air pollutants they generate. A two second delay will have negligible impact on air quality at the intersection.

Together with improvements in air quality as a result of less polluting newer vehicles, the net result could even be an improvement in air quality over present conditions.

4. The Mauka Area Rules of the Kakaako Community Development District establish view corridors along certain streets in the district to "protect the scenic views of the mountains, sea and sky, to provide visual relief of building masses, and to allow light and air at the street level" (Section 15-22-66, Mauka Area Rules). Both Pensacola Street and Kapiolani Boulevard are designated as view corridors and are subject to view corridor setbacks.

J149-01
The Honorable Donald A. Clegg
Page 3
October 27, 1992


Building heights, setbacks and design alternatives will be considered during review of the planned development permit.

5. We will identify the heights of the additional structures in the Final EA as follows:

ETO Facility	approx.	30 ft
Parking Structure	approx.	45 ft
Building 857		28 ft

Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

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



C. MICHAEL STREET
DIRECTOR AND CHIEF ENGINEER
FELIX B. LUMIACAO
DEPUTY DIRECTOR

ENV 92-228

September 16, 1992

Mr. Harold Edwards
Project Coordinator
Housing Finance and Development
Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Edwards:

Subject: Draft Environmental Assessment (DEA)
Hale Kewalo Rental Housing Development
THK:2-3-02:1

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

1. A 20-ft. minimum driveway width should be provided for two-way traffic to the proposed project.

2. Based on our records, sewer connection approval was granted on February 13, 1992 for 522 units.
3. Sewer connection must be made to the existing 48-inch East End Relief Sewer.
4. A Wastewater Systems Facility Charge is applicable to the subject project.

Very truly yours,

C. Michael Street
C. MICHAEL STREET
Director and Chief Engineer

3149-01

October 27, 1992

The Honorable C. Michael Street
Director and Chief Engineer
Department of Public Works
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Street:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, HAWAII

Thank you for your letter of September 16, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

1. At 24 feet, the planned driveway will be wider than the minimum requirement.
2. We acknowledge the requirement for a sewer connection approval and will make an official request. The current estimated count is 529 units. The civil engineers for this project will be in contact with your department regarding any upward change in the unit count.
3. The sewer connection will be made to the existing 48-inch East End Relief Sewer on the Kapiolani Boulevard side.
4. We will comply with the Wastewater Systems Facility Charge.

Your letter and this response will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards
Harold Edwards
Development Director

CC: Mr. Al Ahana, HFDC
Mr. Earl Hatsukawa, WOA

Mr. Al Ahana, HFDC
Telephone: (808) 535-2070
Fax: (808) 535-2071

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU



Mr. Harold Edwards
Page 2
September 25, 1992

4. Construction plans for work within the City's right-of-way should be submitted to our department for review.
- Should you have any questions, please contact Lance Watanabe of my staff at 523-4199.

Sincerely,

JOSEPH M. MAGALDI, JR.
Director

cc: Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.

September 25, 1992

Mr. Harold Edwards
Project Coordinator
Housing Finance and
Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

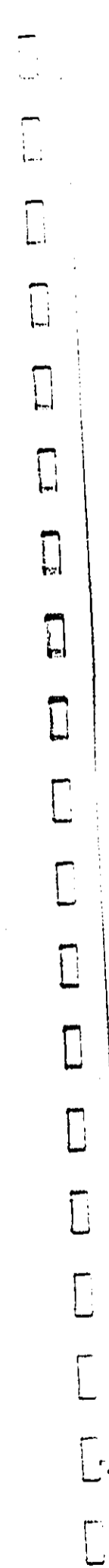
Dear Mr. Edwards:
Subject: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
TKK: 2-3-09: 1

This is in response to your letter of August 12, 1992 requesting our comments on the subject environmental assessment.

Based on our review, we have the following comments:

1. All vehicular access points should be constructed as standard City dropped driveways. Existing driveways along the project's frontage which will not be used by this development should be adjusted to match the standard curb grade.
2. Adequate sight distance should be provided at all driveway locations. On-street parking along both sides of Pensacola Street should be removed to provide unobstructed sight lines as suggested in the traffic study. Parking restrictions should be done in conjunction with this project.
3. The figures for the vehicular trips generated by the project should be verified and substantiated.

TE-3643
PL92.1.105





STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION



KAKAIAO
1000 Kalia Road, Suite 100
Honolulu, Hawaii 96813

John D. Washer
Director

Cary Caldwell
Assistant Director

Mahesh N. Sathyanarayanan
Assistant Director

3149-01

October 27, 1992

The Honorable Joseph M. Magaldi, Jr.
Director
Department of Transportation
Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 25, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

1. We will comply with the City's requirement for standard dropped driveways and standard curb grading.
2. Adequate sight distance will be provided at all driveway locations. As recommended by the traffic study, on-street parking along project frontage on both sides of Pensacola Street will be removed, as suggested in the traffic study. Parking restrictions will be established during the design phase in coordination with your office.
3. To determine figures for vehicular trips generated by the residential towers, we used normal trip rates from the Institute of Traffic Engineers. Vehicular trips generated by the ETO facility and building 857 were based on those for government office facilities. In this regard, the traffic study uses .5 to .65 vehicles per stall entering and leaving the project site during peak traffic hours. These figures were derived from parking studies conducted by Crommelin and Associates, Inc.

3149-01
The Honorable Joseph M. Magaldi, Jr.
Page 2
October 27, 1992

4. As requested, construction plans will be submitted to your department for review and approval.

Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

Mr. Alan M. B. ...
11/1/92
11/1/92
11/1/92
11/1/92

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

HONOLULU, HAWAII 96813-1000



FRANK P. FAH
MAYOR

MICHAEL S. NAKAMURA
Chief
HAROLD E. HUGHES
Deputy Chief

ES-LK

September 14, 1992



HONOLULU POLICE DEPARTMENT



KAKAIAKO
Honolulu Police Department

John D. Walker
Commander

Gary Cullbert
Commander

Michael S. Nakamura
Chief

3149-01

October 27, 1992

The Honorable Michael S. Nakamura
Chief of Police
Police Department
City and County of Honolulu
1455 South Beretania Street
Honolulu, Hawaii 96814

Attn: Mr. Chester E. Hughes
Assistant Chief of Police

Dear Chief Nakamura:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 14, 1992 indicating that you have no comment on the subject Environmental Assessment/Negative Declaration Anticipated. Your letter will be included in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Harold Edwards
Harold Edwards,
Development Director

CC: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

Mr. Joseph K. Conant, Executive Director
Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Attention: Mr. Harold Edwards

Dear Mr. Conant:

The Hale Kewalo draft environmental assessment addresses our concerns about traffic flow and other matters, and we do not wish to make any additional comments. Thank you for the opportunity to review this document.

Sincerely,

MICHAEL S. NAKAMURA
Chief of Police

Michael S. Nakamura
By: MICHAEL S. NAKAMURA
Assistant Chief of Police
Support Services Bureau

CC: OEQC
Wilson Okamoto & Associates

67-111 Hawaii Boulevard
Honolulu, Hawaii 96813
Telephone: (808) 531-2300
Facsimile: (808) 531-2311



September 20, 1992

Gail Sykes
Save McKinley High School Coalition
McKinley High School
1039 South King Street
Honolulu, HI 96814

Ms. Sykes,

At your request I have examined the Environmental Assessment on the Hale Kewalo Rental Housing Development project. As an archaeologist with prior experience with the United States Department of Agriculture and as a consultant to a private montane survey firm (Cultural Resources Inventory), I read the report with a perspective to impact on archaeological (pre-historic and post-historic) resources. In summary, the EA is inadequate in developing the entire scope of possible adverse impact of the project. Specifically, there is no discussion of the impact on the cultural resource of McKinley High School as a National Register site. Secondly, archaeological investigations were not conducted on the Kapiolani Community College campus prior to its development as a community college. Federal and state projects and projects on federal and state lands require archaeological investigations prior to project undertakings. Thirdly, the cultural assessment recommends subsurface testing prior to construction. I am not clear as to when "construction" actually begins, either from initial flagging or when the foundation excavation commences.

This review on the EA is in three parts. First, I list the "impacts" noted in the EA that did not receive adequate attention. Second, I review the cultural resource assessment and its recommendations. Finally, I offer recommendations for the Environmental Impact Statement.

Impacts

1. Does not address the potential earthquake disaster of the project. I am not clear whether the "site" ("site" as noted means project "site") is on land fill or sedimentary deposit. At any case, earthquake damage is severe in such deposits.
2. Indicates "marginal" impact of air quality. Does not state what the acceptable levels are nor what the projected levels of air quality might be.
3. Does not address the adverse impact on the National Register site (site as noted means cultural resource) due to increased pedestrian and vehicle traffic and does not address the adverse impact on the National Register buildings due to "marginal" air quality.
4. Does not address the impact on the visual aesthetics of McKinley High School from the King Street view.
5. Does not address the impact of such a project on the historical nature of McKinley High School as part of the Thomas Square Historic District which

September 20, 1992

Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, HI 96813

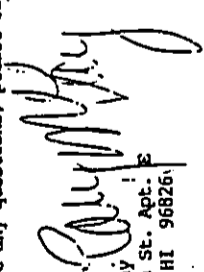
Dear Mr. Harold Edwards,

At the request of Ms. Gail Sykes of McKinley High School, I have reviewed the Environment Assessment (draft) of the Hale Kewalo Rental Housing Development. I am enclosing that review.

I have two brief comments. First, the project will have an adverse effect on the McKinley High School campus as a National Register cultural resource. Second, no archaeological investigations were done prior to the development of the Kapiolani Community College. Since this "site" is state-owned, the state ought to understand its obligations and pursue the archaeological work prior to construction.

If you have any questions, please call at 943-6642.

Sincerely,



Rory M. Gay
1738 Nanea St. Apt. 5
Honolulu, HI 96826

includes the Honolulu Academy of Art, Thomas Square, and the old Linekona "site" of McKinley High School (1908-1923).

The Archaeological Assessment

1. Provides a brief chronology of the area that indicates pre-contact land utilization and suggests minimal historic use prior to the 1923 construction of McKinley High School at its present location.
2. Indicates high potential for uncovering human remains including native Hawaiians and burials.
3. Indicates that State Historic Preservation Office (SHPO) is interested in the potential for wetlands environment interpretations.
4. Recommends subsurface testing prior to construction. As noted above, does not specify at what point "construction" begins.
5. Does not discuss the National Register site of McKinley High School campus.
6. Indicates that no archaeological investigations have been conducted in the project "site."

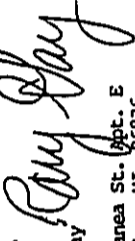
Recommendations

1. Follow the recommendations of the Archaeological Assessment for subsurface testing. The sample size of the testing should follow current State guidelines.
2. Determine the potential impact on the project on the visual aesthetics of the King Street view of McKinley High School as a National Register site and determine the possible adverse impact on the buildings due to increased traffic and "marginal" air quality.
3. More specific information is needed on the local history of the "site." Information on prior ownership before the initial condemnation by the State will give a better idea of historic land use of the "site." As noted above, the archaeological assessment suggests minimal use.
4. Any development on the "site" should enhance the architecture and cultural value of the McKinley High School site. Any buildings should be in the appropriate mode and design. Development for public use of the "site" should emphasize the historic value of McKinley High School and its environment

Closing Remarks

An Environmental Impact Study should be implemented. The project will have adverse effect on the McKinley High School campus. If this view of adverse effect is not accepted, then archaeological investigations should be implemented prior to any construction. Mitigation of discovered cultural resources should be undertaken at that time.

I hope this review of the Environmental Assessment is of help. As per our last discussion, I will undertake the library research of archaeological investigations in the area as well as the possible association of Maria Parker to the "site" in question. Please call me if further information is needed.



Rory Gay
1738 Nanea St. Apt. E
Honolulu, HI 96826



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKA'IKO
1100 Kalia Road, Honolulu, HI 96813

John D. Walker
Director

Carly Culbreth
Assistant Director

Michael N. Sweeney
Assistant Director

3149-01

October 27, 1992

Mr. Rory Gay
Apartment E
1738 Manea Street
Honolulu, Hawaii 96826

Dear Mr. Gay:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 20, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

Impacts

1. The City and County of Honolulu building code specifies requirements for protecting buildings on Oahu from the threat of earthquakes. The requirements are based on a standard that was recommended by the Structural Engineers Association of Hawaii. All building code requirements will be complied with.

2. Our statement concerning the marginal impact on air quality stems from the projected marginal increase in traffic volume as a result of the project.

3. We are puzzled by your reference to the impact of pedestrians, vehicular traffic and air quality on the historic buildings. It is unclear how you anticipate pedestrian traffic to affect these buildings which are actively used by the high school. It is also uncertain what impacts you foresee with respect to increased vehicular traffic. Our traffic study finds that traffic contributed by the project will comprise approximately 4% of projected future traffic levels in the immediate vicinity of the project. In Hawaii, air quality concerns related to traffic generally center on carbon monoxide levels in public areas such as sidewalks adjacent to busy intersections. We are

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3149-01
Mr. Rory Gay
Page 2
October 27, 1992

unaware of vehicular-generated air quality impacts on historic structures in Hawaii.

4. The State Historic Preservation Division of the Department of Land and Natural Resources has determined that the project will have "no effect" on the historic character of site 9926, which is the McKinley High School campus. We will include this finding in our Final Environmental Assessment.

The proposed towers in the Hale Kewalo development will measure approximately 260 feet. This is considerably shorter than the 400-foot tall structure planned across Pensacola Street from the project site and elsewhere in the Kakaako District. These taller structures will join the existing 400-foot Mawru Tower as well as the proposed shorter project towers in establishing the high-rise character of the backdrop to McKinley High School as viewed from King Street.

5. From the urban design perspective, the proposed project will be more closely associated with the high-rise character of the adjoining portion of the Kakaako Mauka district than the Thomas Square Historic District.

Archaeological Assessment

Comments in this section are statements which do not require a response.

Recommendations


1. The subsurface assessment shall follow State guidelines and a report shall be prepared and submitted to the State Historic Preservation Division. The assessment will be conducted after the structures on the project site have been demolished but before construction, including pile driving, is commenced.

3149-01
Mr. Rory Gay
Page 3
October 27, 1992

2. See responses to items No. 3 and 4 under "Impacts."
3. It is unclear what information is being sought in your statement that "more specific information is needed on the local history of the site." The proposed subsurface archaeological assessment is intended to answer questions regarding historic land uses, if any, which cannot be addressed as long as the site is occupied by the existing facility.
4. See response to item No. 4 under "Impacts."

We hope that we have adequately responded to your comments. Your letter, together with this response, will be reproduced in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Harold Edwards
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

September 22, 1992

Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813
ATTN: Mr. Harold Edwards

Dear Mr. Edwards,

**Subject: Hale Kewalo Rental Housing Development
Draft Environmental Assessment**

We have reviewed the Draft Environmental Assessment dated August 1992 for the above project. The Draft concludes that there will be no significant impact from the project as it is now proposed. We find the report clearly does not support this conclusion to an open minded reader. The minimal scope and depth of the report, the contrary simplistic conclusions, direct conflicts with existing long range plans, as well as very serious omissions, strongly support the case for a full study of all impacts from the project. The reasons for this conclusion follow:

1. This project takes away the last significant educational expansion site in Honolulu and clearly conflicts with the long term educational goals and policy of the State of Hawaii. This project is also a direct and clear violation of the Mauka Area Plan of the HCDA. The Draft EA notes that Hawaii's Educational Functional Plan has as its objective, adequate and accessible educational services and facilities designed to meet individual and community needs. The Draft states that the ETO component meets this need. No discussion is made of the needs of elementary, secondary, and high school students. A discussion of these educational needs is necessitated by the fact that construction of the proposed residential units would preclude using this site to meet any present educational needs or future educational demand (the fact that residential towers would effectively preclude any other educational use is noted in the Draft EA). The HCDA's own Mauka Area Plan documents identify the McKinley former KCC site and the former Pohukaina site as school locations to meet the demand for two to five elementary schools in the Mauka Area alone. This same HCDA Mauka Plan suggests that elementary schools have a service radius of 1/4 to 1/2 mile. The closest elementary school is now Kaahumanu, about a mile away and currently at capacity. Any meaningful analysis of the impact of the taking of a major educational site must also look at the intermediate and high school levels in the entire school service area. The Mauka Area alone will have the need for two to five schools, what about the effect on the higher grades? The Mauka Area is only about one sixth of the McKinley District. The Mauka Area Plan envisions 19,000 residential living units in the Mauka Area alone. Using the relationship from the DOE of population and public high school students, the Mauka Area alone would add 1,500 high school students to McKinley. As other residential projects are built, such as the Pawaa Super Block (2,000 units), other residential blocks downtown, in McCully, Kewalo, Kalihi, Palama, Liliha, and

other parts of the McKinley District, the demand for education in all areas will grow as surely as the City will grow. The cost to condemn any future school sites in the City will be impossibly high as more high-rise buildings are constructed since the State is required to pay the condemnor for the improvements also. A good EIS is crucial.

2. This project will clearly affect the economic and social welfare of the community in the short and long run. There is undoubtedly a strong demand for housing on Oahu. Thousands are literally homeless or are "hidden homeless". At a time of tax revenue shortfalls, spending public funds on housing for University Professors, who make above average incomes, has to affect the economic and social welfare. In addition, taking major sectors of centrally located educational land out of the education system has to have an effect on the children of the neighborhood, homeless or with homes. Schools should be the last resort location to build housing, not the first.

3. The health of the public living in the project as well as the people using the McKinley School facilities is in clear need of review. On one hand, the people living in the project will have certain peace and quiet expectations. On the other, the McKinley campus is a major school facility with full activities. Sports, bands, dances, practice sessions, fairs, and other noise generating activities are real parts of life. Examples of similar conflicts abound in this City. Schools such as Moanalua, Iolani, Roosevelt, and Punahou are just some examples of schools that have had to make major changes in their programs due to many complaints about normal activities of a school. To assume that, as the Draft EA does, that a clause in the lease and the option for air conditioning will solve all problems is irresponsible without documentation of where this solution has worked. To not address these concerns in a real way is negligent.

4. During the construction period, portions of the McKinley campus would be made unusable by the noise of construction affecting the health of those at school. Construction involves extensive pile driving. Very few classes are air-conditioned. There are no buildings on campus that were designed to keep out the noise of pile driving. A lot of pile driving is expected due to the fact that the neighborhood is known for being former marsh with solid rock very deep down in many areas. The adult community school also uses the campus at night. The campus is in heavy use over twelve hours a day. There is also concern that extensive pile driving could damage the buildings on the Historic Register. This possibility is real as it has occurred in Waikiki with construction there.

5. The effect of long term commitment of the land has not been objectively and competently evaluated. The report states that there are no existing plans for alternative uses of the land. The lack of plans, if it were true, would not mean that the proposed use is the best use in the long run. We suggest that the writers ask the Department of Education. They have plans for the site. The report also notes that expansion of the high school is not envisioned in the foreseeable future. We suggest that the writers ask the school and the many other users of the campus including the adult community school. Some of the current high school programs, such as the program for young parents, were actually on the site before they were forced out by the University with the threat to cut off utilities. Again, how does the taking affect the educational system of Honolulu?

6. The traffic analysis fails to recognize the overall picture. As the project is planned, half or more of all the traffic will go to the Manoa University campus at almost the same time. The study did not reflect this likelihood. Allegedly, the proposed project is to serve all campuses. But the great majority of professors showing up at the hearings to testify have been from the Manoa Campus. The policy of Manoa to not hire locally educated professors tends to further the likelihood that most of the traffic will go to Manoa since the building is for outside arrivals. Special consideration should also be given for the many cars that will try to cut across Pensacola Street to get to Pitkoi Street to go mauka towards the freeway to get to Manoa, a rather dangerous maneuver. The traffic study should include the entire area between the project and the University including the effect on the University parking. Housing on or next to the Manoa Campus should be considered as an alternative.

7. The Draft EA failed to consider alternatives. The Draft EA should consider the no build alternative (thus keeping the land in active public education to meet present and future needs), the alternate site alternative (especially alternate sites on or next to the Manoa Campus), and the alternate concept alternative (especially one that would have more room for educational use or not adversely affect the visual impact of the Historic buildings on the McKinley Campus or receive so much of the healthy, normal noise of the school as do high-rises since noise tends to "rise"). It is not logical to not consider alternatives by saying that the legislature picked the site when there never has been a public hearing looking at alternatives. (The 1991 legislature funded the seed \$3.5 million only in conference committee without a public hearing. Most did not notice the single entry in the budget. The 1992 session was asked only to further fund the project. No hearings considered the alternatives.) The legislators most probably expected that an EIS would be done.

8. Many people want to see the project relocated. The Governor was presented with a petition last month wherein about eleven thousand people asked that the project be relocated away from the proposed location. The social impact of taking a large chunk of centrally located active education land, used by many, for the use of a relatively few (and 50% non-residents at that) must be considered.

9. Other projects with less living units and less land area have completed EIS final reports. The Kekaulike Project with only 154 residential units (Hale Kewalo has about 530 residential units) on 1.5 acres of land (Hale Kewalo has 5.3 acres) completed a final EIS dated June 1991. The Smith-Maunakea Housing Project with 234 residential units in one tower (Hale Kewalo has two towers) on 1.0 acre of land has a final EIS dated July 1991. The Kailua Gateway Development with 403 living units completed a final EIS dated May 1992. None of these Projects impacted public education as seriously as Hale Kewalo will. An EIS should be done for Hale Kewalo.

10. A Federally recognized Historic Site is just a few hundred feet away from the Hale Kewalo Site. The main part of the McKinley Campus, just a short distance away, on the same block, is a State and Federally recognized Historic Site. Full consideration should be given to the effect of the proposed project on this Historic Site (that still contains bullet holes from the raid on Pearl Harbor among other things)

11. The entire City block with Blaisedell and McKinley is improved with active low rise public structures. Hale Kewalo would be a major departure in that it will be two high-rise towers and not be open to the public (or to Hawaii residents in the case of the Professor's tower.) Such a major departure from existing public use of public land should be properly evaluated in an EIS.

12. The Hale Kewalo project will affect the University of Hawaii and the Hawaii Public School System, both of which receive Federal moneys. The effect on both institutions will be significant and should be properly evaluated in an EIS.

13. The Draft EA clearly calls for archeological work to be done prior to any construction. There is no evidence that this site is not of significance since it has not been tested. It is important that no piles be driven prior to proper archeological evaluation. It is a lowland area that was quite central and is conducive to stratified artifacts of historic significance. An EIS would properly evaluate and protect any historic significance. A negative declaration would contradict the archeological recommendation of the Draft EA.

14. The project will force the cancellation or moving of major cultural and social events. The field and campus directly adjacent to the proposed project is the site of many widely attended social, cultural, and civic events. For example, the State farm fair attracts some 200,000 people. Other fairs attract additional fair goers. The cafeteria and gym are used by many different groups from churches to educational organizations to social groups. The prospect for conflict is real. The most well known example is the Waikiki Shell. Other schools, such as Roosevelt, Iolani, Moanalua, and Punahou, have limitations on public events due to noise complaints and event traffic congestion.

15. The project is inconsistent with the public nature of the neighborhood. The city block with McKinley and Blaisedell Center is directly contiguous with (portions are actually part of) the Thomas Square/Honolulu Academy of Arts Special District. Together, this Special District and the McKinley/Blaisedell block provide much needed public areas and real contrast to the very high density nature of the neighborhood. Any review of the impact of the proposed project should analyze the effect of limiting a major portion of this public area to a restricted few individuals (as a housing project on public land in central Honolulu would do).

16. We wish to make it clear that we fully support housing for the people of Hawaii. Our concerns are directed to those who would use housing to take land dedicated to active public education, in a growing city, using the excuse of housing, to the long run detriment of the children of Hawaii. Every reasonable attempt must be made to provide for both education and housing. Housing can be put on a much wider variety of locations than schools can. The McKinley educational block is unique in its potential to meet the needs of a good public education. We do not propose that the high school be the only user of the old KCC site at all. As long as it is available for the use of all who wish to pursue active learning, we are all winners. Elementary classes to adult education to University classes are all welcome.

October 27, 1992

Based on our sixteen point discussion in the last four pages, we strongly feel that any objective reader of the Draft EA will see the need for a full and objective study, supported by proper documentation, from a position of objectivity and not advocacy. At stake is a decision that will affect the future of our public schools, the futures of our children and their children to come. It is negligent to conclude, at this point, that the project will have no significant impact. We urge that an Environmental Impact Statement be done.

Sincerely,

Paul Kadooka
Paul Kadooka
McKinley PTSA President

Patricia Hamamoto
Patricia Hamamoto
Principal, McKinley High School

Migi Hirano
Representative Hazie Hirano

Rod Tam
Representative Rod Tam

David Hagino
Representative David N. Hagino

Kenneth Hiraki
Representative Kenneth Hiraki

cc: Office of Environmental Quality Control
Attn: Mr. Brian J. Choy
Wilson Okamoto & Associates, Inc.
Attn: Mr. Earl Matsukawa



John D. Waahne

Carl Campbell

Michael N. Nishimura

Mr. Paul Kadooka
President
McKinley High School PTSA
Ms. Patricia Hamamoto
Principal
McKinley High School
Representatives Hirano, Tam,
Hagino, and Hiraki

C/O Mr. Paul Kadooka
Apartment 407
1619 Kamamalu Avenue
Honolulu, Hawaii 96813

Dear Mr. Kadooka, et al.:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 22, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses to your numbered comments, respectively:

1. The HCDA's Mauka Area Plan acknowledges the potential value of the site for educational purposes. At the same time, the HCDA is also committed to achieving the full range of objectives and policies stated in the Plan. In this regard, the proposed mixed-use of the site for housing, recreation, as well as education, serves to ensure that this valuable public resource is most effectively utilized to address the broadest range of public needs. Toward addressing educational uses, the project includes the new ETO facility and also preserves the use of Building 857 on the site for educational purposes. The University of Hawaii is served by the faculty housing tower. Recreation is addressed through the creation of approximately two acres of open space along Kapiolani Boulevard. The EA will be revised to clarify that the proposed development will preclude the site from being used exclusively for educational purposes.

cc: Mr. Brian J. Choy
Wilson Okamoto & Associates, Inc.
Honolulu, Hawaii
October 27, 1992

identified as having a net social benefit, then the appropriate course of action is to seek modification of the DOH rules to allow such activities.

4. As stated in the Draft EA, noise from pile driving is a short-term construction impact. It is estimated that pile driving will last approximately 35 days of the anticipated 17-month construction schedule. During pile driving and intermittently throughout the construction period, noise generated at the project site could be perceived as a nuisance at the high school and nearby residences. Barring any unforeseeable delays in commencing with the project, construction has been scheduled to do test pile driving during the school spring break with production pile driving to be done during the summer break, in order to minimize disturbance at the high school. No construction will be done at night.

As in the case of any major construction project, the contractor is responsible for complying with State noise standards enforced by the State Department of Health under Title 11, Chapter 43 (DOH Administrative Rules). If construction noise is expected to exceed those limits, a permit which includes restrictions on permissible operating hours is required.

Toward addressing the potential impact of vibration on historical structures during pile driving, pile holes will be pre-drilled to reduce the amount of force required to drive the piles and seismographic monitoring will be conducted. While it is anticipated that the potential for damaging the historical structures is extremely low, the monitoring program will determine if an alternative type of pile will need to be used.

5. Currently, the Department of Education has no formal plans for the site. It is our understanding that the DOE has been

Toward assuring that public educational facilities will meet future demands of development in the Kakaako area, the HCDA continues to review and discuss student forecasts with the DOE officials. The current student forecasts prepared by DOE include the marginal increase in demand that will be generated by the proposed Hale Kewalo development. While the forecasts indicate that additional strain will be placed on existing schools, the DOE has not concluded that additional schools will be required.

2. We do not view the project as a tradeoff of education for affordable housing. As stated previously, the proposed mixed-use development provides a unique opportunity to address both the State's housing and education objectives, as well as community recreation.

3. The State Department of Health (DOH) administers community noise standards for Oahu (Title 11, Chapter 43-J, Administrative Rules, DOH). As residential and other noise-sensitive developments have occurred near locations where noise producing activities take place, the DOH has been called upon to enforce those standards. Inasmuch as the Diamond Head side of Pensacola Street between King and Kapiolani is designated almost entirely for residential mixed-use development on the HCDA's Mauka Area Plan, the potential for enforcement of noise standards at some point in the future is significant.

We do not believe that creating a situation where an existing environmental standard may be enforced can be considered an adverse environmental or social impact of the proposed project. Therefore, the proposal to include a noise disclosure statement in the rental agreement and to design the units to accommodate air conditioners is not technically a mitigation measure. If certain noise-producing activities are

3149-01
Mr. Paul Kadooka, et al.
Page 5
October 27, 1992

to nearby Kamaile Street, and from there onto Piikoi, this maneuver is illegal and, if necessary, can be deterred with appropriate enforcement.

Traffic studies typically assess key intersections near the project site where potential impacts of the project are most significant. With increasing distance from the project, traffic disperses as motorists head in different directions or take different routes. Dispersion decreases the proportion of project traffic in the total traffic through a particular intersection with increasing distance from the project. Traffic from the proposed Hale Kewalo development will comprise approximately 4 percent of the traffic flow in the immediate vicinity of the project. Dispersion will reduce this proportion to negligible levels within a few blocks of the project.

We shall expand the discussion of the "no-action" alternative with respect to the continuation of the ETO in their current facilities. The long-term foreclosure of alternative uses at the project site is discussed in Chapter VII, Section A. In this chapter, the discussion will be expanded to include the foreclosure of the site for exclusively educational uses. With respect to impacts on historic sites, please refer to our response Nos. 10 and 11. With respect to noise impacts, please refer to our response Nos. 3 and 4.

While there was no formal procedure used to select the site, the University's position is that lands under their control will be utilized before they will attempt to acquire additional land. Other considerations include the size of the property, location, priorities regarding current uses and State and County land use controls which dictate what can be built. The site was considered ideal since it met these considerations and could accommodate most of the existing ETO facilities as well as much-needed affordable

7.

3149-01
Mr. Paul Kadooka, et al.
Page 4
October 27, 1992

considering alternative uses, including an elementary school and expansion of the high school, although current enrollment projections have not concluded that such facilities are needed in the foreseeable future. It should be emphasized that the proposed project is a mixed-use development which addresses education as well as affordable housing. Affordable housing is only proposed in one of the towers and will require a portion of the space in the parking structure. The rest of the site is devoted to facilities which will be used for, or will support, education.

6. We disagree with your contention that the proportion of faculty from the various campuses who will be residing in the project can be determined by the attendance at the hearings. Meanwhile, we find your contention that the University of Hawaii Manoa has a policy to against hiring locally educated professors baseless and unnecessarily inflammatory.

Residents in the proposed project will use a new driveway to be built onto Pensacola Street a little less than 400 feet makai of the driveway serving McKinley High School. Appropriate signage and barriers will keep resident traffic from using the high school's driveway. During the morning peak traffic hours and anytime traffic is heavy, residents intending to drive mauka on Piikoi to the freeway will turn right onto Pensacola, cross Kapiolani Boulevard and proceed to Waimanu Street, turn left, then turn left again to go up Piikoi Street. Another way to get onto Piikoi is to make a broad right turn on Pensacola to get to the far left lane, turn left onto Kapiolani, then turn left on Piikoi. This maneuver can be safely executed in lighter traffic but would not be viable during the morning peak traffic since the left turn from Kapiolani onto Piikoi is prohibited during these hours. While it may also be tempting to cut against the one-way flow on Pensacola to get

rental housing. It should be noted that the University is also planning to build faculty housing on lands they own in Manoa Valley.

8. We are aware that there is some public opinion opposing the project location. As we stated earlier, we do not view the project as a tradeoff of education for affordable housing. It is a mixed-use development offering a unique opportunity to address both the State's housing and education objectives.

9. The decision to prepare an environmental impact statement rests with the accepting authority, which is the State Housing Finance and Development Corporation, and is based on the identification of significant adverse environmental or social impact.

While the proposed project is large in size, its impacts are relatively insignificant within the context of the proposed redevelopment of the Kakaako area which was assessed in the Final Environmental Impact Statement for the Kakaako Community Development District Plan, filed in June 1983. The project itself was not included in that EIS. The current review process for environmental assessments, pursuant to Act 241, SLH 1992, assures that agencies and the general public are afforded greater opportunity than in the past to identify any significant impacts. We feel that this revised process allows for more streamlined review of projects, such as this, which may be large but have relatively insignificant impact.

10. We shall include in the Final Environmental Assessment the status of McKinley High School on the National and State Register of Historic Places. The State Historic Preservation Division issued in April of 1992 their opinion that the proposed project will have "no effect" on the historic character of the McKinley High School site.

11. The HCDA views the urban design context of the proposed project as that established by the residential mixed use zone across Pensacola Street and has determined that this zone is the most appropriate adjacent zone to apply to the site. Notably, the proposed structures, at approximately 260 feet will offer a transition between 400-foot maximum height for structures across Pensacola Street and Kapiolani Boulevard and the low rise structures at McKinley High School.

With respect to public accessibility, Building 857, which will be retained, and the new ETO facility are both public buildings. Public access to these buildings will be subject to the usual security considerations, and is not anticipated to be significantly different than it is for the existing facilities. Similarly, no extraordinary restrictions on public access are anticipated on roadways and parking areas. The residential towers will be no less accessible to the public than might be expected for other apartment-type residential buildings for security reasons. Because of their high-rise design, however, they will occupy relatively little surface area on the project site. Notably, the 1-3/4-acre park fronting Kapiolani Boulevard will create a freely accessible park/open space where none exists today. This park covers approximately a third of the site.

12. We cannot ascertain any impact that the proposed project might have on the ability of DOE or the University to receive federal funding. If you are aware of any specific restrictions that may apply, we would appreciate the information.

13. The State Historic Sites Division concurred with the archaeological study's recommendation for subsurface testing prior to construction. The recommendation does not automatically imply a significant impact, but is routinely required when

J149-01
Mr. Paul Kadooka, et al.
Page 8
October 27, 1992

existing uses preclude subsurface testing at the site assessment stage. This is as far as an archaeological study can go even if an EIS were to be prepared. A subsequent report of findings and appropriate mitigation, if any, will be submitted to the Division when the subsurface tests are completed.

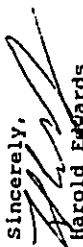
14. Please refer to our response No. 3 regarding noise. Traffic associated with events at McKinley High School and the adjacent field currently affects the neighboring residential areas. Such effects include traffic congestion created by event attendees searching for parking in the neighborhood and competition for on-street parking. Future residents moving into the proposed project would face similar conditions during such events. It does not necessarily follow that they will be more prone to complaining than current neighborhood residents, nor that such complaints about traffic will force the cancellation or relocation of events.

15. With respect to urban design considerations and public access, please refer to our response No. 11.

16. Because this item does not address the contents of the Draft EA, we have no response to offer.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be reproduced in the Final Environmental Assessment. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Harold Edwards
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

September 21, 1992

Mr. Harold Edwards
Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Dear Mr. Edwards:

At the request of the Save McKinley High School Coalition, Mr. Forry Gay, archaeological consultant, has reviewed the Environmental Assessment of the Hale Kewalo Rental Housing Development. His review is attached to this letter. I will, however, address some of the points he has made in his review as well as some ideas I have concerning the adverse impact that this project will have on McKinley High School and therefore, in turn, the community.

The issue of McKinley High School as a cultural resource on the National Register of Historic Places seems to have been ignored. If such sites are so significant to be selected for the National Register, I think that the potential impact on them should be examined. Mr. Gay's review addresses the adverse impact on the visual aesthetics from the King Street view. In addition, the context of McKinley High School as a prominent part of the Thomas Square Historic District and the potential impact on the buildings of McKinley High School due to marginal air quality and traffic are discussed. To this, I add, what about the effect of the sound vibrations on these buildings when the foundation piles of the Hale Kewalo project are driven? What will be the detrimental impact of this? In the very least, historic buildings at McKinley High School could be cracked even as buildings and surrounding areas were cracked in Waikiki when the Duty Free Shoppers erected their new facility.

I note that the archaeology was not done before Kapiolani Community College was constructed. Is it not a law that an environmental impact study (which includes archaeology) must be done before public construction or projects are done on public land? The State, it appears was remiss in the rCC; McKinley construction without archaeology. I would hope that it would not be negligent in allowing construction of the towers without adequate archaeological work.

As to the scant historic record of the area, I have discussed with former residents of the Hawaiian Land Area the fact that the area once contained two and three ponds. I also note that in the land records, at least one of the owners of the land, was a Maria Parker of Lamuela (Eminent Domain No. 9280). I am documenting whether she and other owners were Hawaiians. There is, I am sure, a historical record of the area. Many families lived in the area. Research will reveal information of significance.

The issue of the high water table on this site is not discussed. There are springs below McKinley High School which have recently impeded reconstruction and construction on the land. When the Academic Core Library Building was constructed, the contractor hit water at the five feet below the surface level. The land area of all of McKinley High School including the rCC/McKinley parcel is marshy land. Might not the water table be a problem should the Hale Kewalo construction of two 26 storied buildings commence?

Finally, I have observed the survey markings on the pavement at both the rCC/McKinley site and at McKinley High School. Does this mean that construction has begun? According to the recommendations of the Archaeological Assessment, archaeological excavations should be conducted to determine if significant archaeological resources are present. Has the archaeology been done? What was discovered? May I have a copy of the report?

I believe that you will concur that several issues have been revealed which require further investigation. The adverse impact of the project far outweighs any short-term benefits for a few who would occupy the towers. As it stands, the Environmental Assessment is not adequate. An environmental impact statement needs to be compiled before any construction takes place. No test piles should be driven until the total EIS is completed. Hawaii must be in compliance with both federal and state laws.

October 27, 1992

Ms. Gaile A. Sykes
Save McKinley High School
Coalition
#102
1039 South King Street
Honolulu, Hawaii 96814

Dear Ms. Sykes:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of September 21, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses in the respective order of your comments:

1. Our response to Mr. Rory Gay's review is attached.
2. We shall include in the Final Environmental Assessment the status of McKinley High School on the National and State Register of Historic Places. The State Historic Preservation Division has determined that the project will have "no effect" on the historic character of site 9926, which is the McKinley High School campus. We will include this finding in our Final Environmental Assessment.
3. The HCDA views the urban design context of the proposed project as that established by the residential mixed-use zone across Pensacola Street and has determined that this zone is the most appropriate adjacent zone to apply to the site. The proposed towers in the Hale Kewalo development will measure approximately 260 feet. This is considerably shorter than the 400-foot tall structure planned across Pensacola Street from the project site and elsewhere in the Kakaako District. These taller structures will join the 400-foot Maura Tower and the shorter project towers in establishing the high-rise character of the backdrop to



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKA'AKO
Historic Preservation Division

Manu Walker
Director

Caro Cuthbert
Assistant Director

Michael N. Siskine
Assistant Director

Mr. Michael Siskine
Assistant Director
Honolulu, Hawaii
10/27/92
1992-10-27

Please note, we of our intent regarding the request for an environmental impact statement.

Sincerely,

Gaile A. Sykes

Gaile A. Sykes
Save McKinley High School Coalition
1039 South King Street
Honolulu, Hawaii 96814

Attachments

CC: Office of Environmental Quality
Wilson Chamoto & Associates, Inc.
National Register of Historic Places
State Register of Historic Places
Patricia Hamamoto, Principal, NHE
Charles Johnson, Superintendent, DCE

the backdrop to McKinley High School as viewed from King Street.

4. We are puzzled by Mr. Gay's reference to the impact of pedestrians, vehicular traffic and air quality on the historic buildings. It is unclear how pedestrian traffic would affect these buildings which are actively used by the high school. It is also uncertain what impacts may result from increased vehicular traffic. Our traffic study finds that traffic contributed by the project will comprise approximately 4% of projected future traffic levels in the immediate vicinity of the project. In Hawaii, air quality concerns related to traffic generally center on carbon monoxide levels in public areas such as sidewalks adjacent to busy intersections. We are unaware of vehicular-generated air quality impacts on historic structures in Hawaii.

5. Toward addressing the potential impact of vibration on historical structures during pile driving, pile holes will be pre-drilled to reduce the amount of force required to drive the piles and seismicographic monitoring will be conducted. While it is anticipated that the potential for damaging the historical structures is extremely low, the monitoring program will determine if an alternative type of pile will need to be used.

6. Kapiolani Community College was constructed at the project site in 1968. The State EIS law (Chapter 343, Hawaii Revised Statutes) went into effect in 1974. The requirement for the State Historic Preservation Office (subsequently, the State Historic Preservation Division) to review the impact of State projects on historic property was enacted in 1976 (Chapter 6E-

8, HRS). Actual refinement of the process to require archaeological studies of the sort recommended for the proposed project occurred years later. Therefore, your implication that the State is in violation of these laws is incorrect.

7. Partly due to the scant historic record available, the State Historic Preservation Division concurred with the archaeological study's recommendation for subsurface testing prior to construction. A subsequent report of findings, and appropriate mitigation if any, will be submitted to the Division when the subsurface tests are completed. You may consult with the Division regarding obtaining a copy of the report when it is filed with them.

8. The water table lies approximately four feet below grade. Except for the elevator pits in the residential towers and the parking structure, no subsurface construction is required. The water table is not expected to pose a significant constraint on the construction of the elevator pits. The other buildings will be constructed on piles and, therefore, will not be affected by the water table.

9. Land surveys of the project site were conducted in conjunction with preparing documents conveying the site to the HCDA. These may have been the markings you observed.

10. Please refer to response No. 6 regarding the archaeological study.

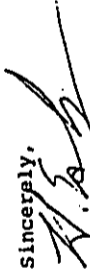
11. Construction of the project may not proceed until the requirements of Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) have been fulfilled, either by the filing of a Final EA/Negative Declaration or a Final EIS; and, the recommended

3149-01
Ms. Gaile A. Sykes
Page 4
October 27, 1992

subsurface archaeological study has been prepared, filed with and reviewed by the State Historic Preservation Division.

Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Harold Edwards,
Development Director

Attachment

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

September 21, 1992

Harold Edwards
Housing Finance and Development Corporation
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Honolulu, Hawaii
TMK 2-3-09: 1

Dear Mr. Edwards:

After reviewing the Draft Environmental Assessment (EA) for the above project, I would like to submit the following comments. The Environmental Impact Statement Rules of the Department of Health, §11-200-9, require that in the assessment process, the agency shall consult with citizens, groups and individuals. Where an environmental assessment is expected to result in a Negative Declaration as in the Hale Kewalo project, it is especially important to allow the public to address the project prior to a determination. In the instant case, there has been no public hearing on the Hale Kewalo project and the required consultation with citizens, groups and individuals has not occurred. Consequently, the EA itself is flawed based upon Hawaii Community Development Association's (HCDA) violation of the Department of Health's EIS Rules, §11-200-9.

Although I firmly support and commend the State and its agencies in the construction of affordable rental units, the subject real property which was set aside in 1921 by the governor of the Territory of Hawaii in Executive Order 101 as a site for a public high school is not the proper location for such housing. Construction of the proposed twin residential towers on the McKinley High School site will have a significant effect on the environment. Since the proposed Hale Kewalo Rental Housing Development will have a significant effect on the environment, an environmental impact statement for the project must be submitted pursuant to Hawaii Revised Statutes, §343-5.

The Hale Kewalo project will have a significant impact upon the environment because it involves an irrevocable commitment to loss or destruction of the natural resource of land. The EA notes that although there are no existing plans for alternative uses of the site, it has been regarded as a potential expansion area for McKinley High School. As recognized in the EA, development of the project will prohibit the use of the property to accommodate unforeseeable growth of the high school. Resources of energy and water will be required for the construction of the project and these resources will be consumed by residents after the project is completed. The EA does not discuss the long-term impact upon these resources.

The range of beneficial use of the site will be curtailed by construction of twin residential towers. McKinley High School extracurricular activities such as band practice, sports, dances, and carnivals will be impacted by the proximity of the housing units. The noise generated by school activities as well as events such as the Fiftieth State Farm Fair held at the Neal Blaisdell Center is likely to cause conflicts between town and gown which may result in eliminating these beneficial school and public activities in which many residents participate.

Construction of two residential towers conflicts with Executive Order No. 101 (EO 101) executed by the governor of the Territory of Hawaii in 1921. EO 101 expressly states that the site is "set aside for public purposes, to-wit, for a site for the McKinley High School". Use for any other purpose violates the intent of EO 101. Further, Executive Order No. 3567 (EO 3567) executed by Governor Waihee on August 31, 1992 which purports to set aside land to HCDA for the public purpose of "housing and other purposes", is defective because it sets aside land already set aside in EO 101 as the site of McKinley High School and does not withdraw all or a portion of EO 101. Additionally, Hawaii Revised Statutes, §171-11, provides that such action by the governor is subject to legislative disapproval. No structure on the property may be built, demolished or altered until the required legislative action is taken. Further, EO 3567 provides that if the land set aside is not used for housing or other purposes consistent with Chapter 206E, Hawaii Revised Statutes, the use of parcel shall revert to the University of Hawaii. Since title to the

land is held by the State of Hawaii, title must revert to the State. Executive Order No. 22 transferred public technical education programs which included then named Kapioalani Technical School from the Department of Education to the University of Hawaii. It did not transfer title to the property upon which KTS was situated. Any reversion to UH relates only to the use by UH of the McKinley site as a community college or public technical education program site.

Development of the property conflicts with the State's long-term environmental policies and goals. The EA briefly and obliquely discusses the "relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity". Negative and positive impacts are not sufficiently identified and discussed. Little thought is given to the short-term and long-term effect of the project on traffic and parking for the area. Although HCDA's Mauka Area plan envisions extensive use of public transportation, pedestrianways, and bikeways by area residents, it recognizes that present bus use is "at a very low level" and that bike usage in the mauka area is "very low". Vehicle traffic in the area is already extremely congested at present and requires coning to provide an additional lane during peak traffic hours. Construction-related vehicles will not only increase traffic volume but will impede traffic flow. The anticipated one thousand new twin tower residents clearly will affect traffic. Apparently no widening of streets is anticipated. The impact of a number of additional residents in the on-going Hauru Towers project as an additional source of traffic congestion (and other strains on the area such as need for water, sewage, medical and public facilities, etc.) is ignored.

The Hale Kewalo project substantially affects the economic and social welfare of the community. Under the guise of providing affordable rentals, this project offers approximately half of its rentals to University of Hawaii professors who receive above average salaries. Location of faculty housing several miles distant from the University has been described by Senator Hiram L. Fong as "poor planning". As housing for staff of community colleges, the location is even less convenient. Although the development of Kakaako will impact upon the public school system of the area by increasing the student population, there apparently is no plan to deal with increased enrollment in area schools, including McKinley High School, which already are operating at full

capacity. As the last land in Kakaako which is available for school purposes, the proposed site is better suited for use by the Department of Education. The EA does not adequately address the impact of student population increase and fails to provide mitigation measures. Although the EA notes that several vocational programs in the now-existing Employment Training Office will need to be re-located, no plan for their relocation is submitted.

The Hale Kewalo project significantly impacts upon the environment because it involves substantial secondary impacts by increasing the population which increases the demand on public facilities, including public schools as discussed above. Additionally, the project may be individually limited but as part of the planned Kakaako community development, cumulatively it has considerable effect upon the environment and involves a commitment for larger actions in the area.

It is clear that the EA does not address the problems presented by the proposed development of the Hale Kewalo project. The EA itself is inadequate and as discussion above indicates the project will significantly affect the environment. An environmental impact statement must be prepared and submitted in accordance with Chapter 343, Hawaii Revised Statutes.

Thank you for your consideration.

Sincerely yours,

Guthrie Hokela

Representative Cynthia Thielien

cc: Office of Environmental Quality Control

Attn: Brian J. J. Choy

Wilson Okamoto & Associates, Inc.

Attn: Earl Matsukawa



Ken D. Walker
 Director

Gary Caldwell
 Director

Michael N. ...
 Director

3149-01
 October 27, 1992

Representative Cynthia Thielen
 House of Representatives
 State Capitol
 Honolulu, Hawaii 96813

Dear Representative Thielen:

Re: Hale Kewalo Rental Housing Development
 Draft Environmental Assessment
 Tax Map Key: 2-3-09:1
 Honolulu, Oahu, Hawaii

Thank you for your letter of September 21, 1992 commenting on the subject Environmental Assessment/Negative Declaration Anticipated. We offer the following responses in the respective order of your comments:

1. The subject EA was prepared and processed in compliance with the EIS Rules of the Department of Health (DOH) Section 11-200-9. That section states that: "In the assessment process, the agency shall consult with...citizen groups and individuals." (emphasis added) The subject EA was filed with the Office of Environmental Quality Control (OEQC) as an Environmental Assessment/Negative Declaration Anticipated pursuant to Act 241, SLH 1992. It was made available for 30 days of public review with notification of its availability published in the OEQC Bulletin, which is distributed to all citizens' groups and individuals on the Bulletin's mailing list. The process elicited comments from two citizen's groups and several individuals, including yourself. According to Section 11-200-9 (DOH Rules) the "assessment process" will not be completed until the Hawaii Community Development Authority (HCDA) makes a determination as to the need for an EIS.

2. Our position is that the Governor conveyed the project site to the HCDA by Executive Order No. 8567 pursuant to Chapter 206-E8, Hawaii Revised Statutes, which supersedes Executive Order No. 101. The subject EA is being processed based on this understanding.

3149-01
 October 27, 1992

3149-01
 Representative Cynthia Thielen
 Page 2
 October 27, 1992

We do not regard this issue as an environmental impact.

3. Your interpretation that the proposed project involves an "irrevocable commitment to the loss or destruction of a natural resource" is inconsistent with our understanding of how this provision is generally interpreted. Any development project will occupy land and likely preclude other uses in the long-term, but this does not mean that the land as a natural resource is lost or destroyed. The concern addressed by this provision is whether or not some intrinsic natural resource such as a unique habitat or species will be destroyed when it is constructed, or if a cultural resource such as an important archaeological site or historic building would be demolished. The proposed project will have no such impact.
4. Your interpretation that energy and water are natural resources that would be lost or destroyed by the project is also inconsistent with our understanding of how this provision is generally interpreted. In the case of water, for example, this provision would apply if a project could significantly damage a freshwater aquifer (which this project does not). Any development project will irretrievably use resources such as energy or water in its construction and both energy and water will be consumed by people occupying a structure. This does not mean that an EIS would be required. We should note that the subject EA identifies irreversible and irretrievable commitments (as opposed to destruction or loss) of resources in Chapter VIII.
5. We fail to see your rationale for linking the noise generated at the high school to the curtailment of beneficial uses of the project site. With respect to noise, the State Department of Health (DOH) administers community noise standards for Oahu (Title

11. Chapter 43-3, Administrative Rules, DOH). As residential and other noise-sensitive developments have occurred near locations where noise producing activities take place, the DOH has been called upon to enforce those standards. Inasmuch as the diamond head side of Pensacola Street between King Street and Kapiolani Boulevard is designated almost entirely for residential mixed-use development on the HCDA's Mauka Area Plan, the potential for enforcement of noise standards at some point in the future is significant.

We do not believe that creating a situation where an existing environmental standard may be enforced can be considered an adverse environmental or social impact of the proposed project. If certain noise-producing activities are identified as having a net social benefit, then the appropriate course of action is to seek modification of the DOH rules to allow such activities.

As stated in the Draft EA, however, a noise disclosure statement will be made in the rental agreement for residential units, and units will be designed to accommodate air conditioners.

6. With respect to HCDA's authority to use the project site, please refer to our response No. 1.

7. Since you have not supported the basis for your claim that the project conflicts with the State's long-term environmental policies and goals, we cannot respond to it. The section on "short term uses of man's environment and the maintenance and enhancement of long-term productivity" summarizes the short-term and long-term trade-offs based on the more detailed findings in the text of the EA.

8. The Kapiolani Boulevard corridor is one of the primary transit routes. With the increase in residential development in the Kakaako area, the importance of transit service will grow.

We concur that traffic in the area is busy and that coning is provided during peak hour to reduce congestion. The Final EA will be revised to clarify that the movement of heavy equipment will be restricted to off-peak traffic hours. The impact of commuting construction workers will be more than offset by the absence of commuters to the existing ETO facility which will have been abandoned prior to construction.

A traffic study for the project was prepared and appended to the EA. It determined that no street widening will be required to accommodate the proposed project. Contrary to your statement, the traffic study specifies, in the "Future Conditions" section, that the traffic projections for the existing Nauru Tower, Phase I, and the Nauru project (Phase II) now under construction at the former 404 Piikoi site have been included in future traffic projections.

Water and sewage services for the project were discussed with City agencies prior to the preparation of the EA. All requirements to obtain service imposed by these agencies will be complied with. Medical facilities in Honolulu serve the entire Honolulu region as opposed to localized areas. Within this context, the project will have negligible impact.

9. There was never an attempt to disguise the Hale Kewalo project as exclusively an affordable housing project. The proposed mixed-use of the site for housing, recreation, as well as education activities, serves to ensure that this valuable public

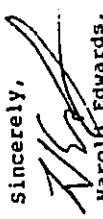
also committed to achieving the range of objectives and policies stated in the Plan. As discussed previously, the proposed mixed-use development will address the broadest range of these objectives and policies.

12. The relocation of the ETO function will be coordinated by the University of Hawaii which administers the facility. Unlike the relocation of private residences or businesses, there is no government program pertaining to the relocation of ETO. Hence, no relocation plan is required.

13. The EA for the proposed project does not assess redevelopment of the entire HCDA Mauka area. That was done in the EIS prepared for the Mauka Area Plan by the HCDA in 1983. An EA was required for the Hale Kewalo project because it involves the use of State lands and funds for a project not assessed in that earlier document. Its overall impact on public services and utilities is marginal in the context of the Mauka Area redevelopment project.

Your letter and this response will be reproduced in the Final Environmental Assessment. Thank you for your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Harold Edwards,
Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HOA

resource is most effectively utilized to address the broadest range of HCDA's objectives and policies. Toward addressing educational uses, the project includes the use of Building 857 on the site for educational purposes. The University of Hawaii is served by the faculty housing tower. Recreation is addressed through the creation of approximately two acres of open space along Kapiolani Boulevard.

10. With respect to siting of faculty housing, the University's position is that lands under their control will be utilized before they will attempt to acquire additional land. Other considerations include the size of the property, location, priorities regarding current uses and State and County land use controls which dictate what can be built. The site was considered ideal since it met these considerations and could accommodate most of the existing ETO facilities, address educational needs in general, as well as provide much needed affordable rental housing. It should be noted that the University is also planning to build faculty housing on lands they own in Manoa Valley.

11. Toward assuring that public educational facilities will meet future demands of development in the Kakaako area, the HCDA continues to review and discuss student forecasts with DOE officials. The current student forecasts prepared by DOE include the marginal increase in demand that will be generated by the proposed Hale Kewalo development. While the forecasts indicate that additional strain will be placed on existing schools, the DOE has not concluded that additional schools will be required.

The HCDA's Mauka Area Plan acknowledges the potential value of the project site for educational purposes. The HCDA, however, is

EISPN CONSULTATION

JOHN W. JONES
General
Director
SABALLA DEAN ELLISON
Deputy Director
BICE EDGAR
Deputy Director
TACENI YORIMASA
Deputy Director

**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

Central Pacific Plaza, 229 South King Street, 15th Floor, Honolulu, Hawaii
Mailing Address: P.O. Box 2159, Honolulu, Hawaii 96804 Telephone: (808) 588-3408 Fax: (808) 588-3377



STATE OF HAWAII
DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT &
TOURISM



John D. Waihele
Governor

Gary C. Causfield
Lieutenant Governor

Michael N. Scalfone
Secretary of State

677 Ala Moana Boulevard
Suite 1011
Honolulu, Hawaii
96813
Telephone
(808) 462-3200
Facsimile
(808) 749-3213

Ref. No.: PL GEN 1.15b.2
March 29, 1993

Mr. Maurice H. Kaya
Energy Program Administrator
Department of Business, Economic
Development & Tourism
State of Hawaii
P.O. BOX 2159
Honolulu, Hawaii 96804

Dear Mr. Kaya:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 12, 1993
indicating you have no comments on the subject EISPN.
Your letter will be included in the Draft EIS. We
appreciate your interest and participation in the
consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

MEMORANDUM

TO: Mr. Mike McElroy
Housing Finance and Development Corporation
Department of Budget and Finance

FROM: Maurice H. Kaya
Energy Program Administrator

SUBJECT: Hale Kewalo (KCC-McKinley) Rental Housing Mixed Development,
Environmental Impact Statement Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1; Honolulu, Oahu, Hawaii

We wish to inform you that we have no comments to offer on the
subject Environmental Impact Statement Preparation Notice (EISPN). We are
returning the EISPN with no comments.

Thank you for the opportunity to review the document.

MHK:hke1s66

cc: Office of Environmental Quality Control
Hawaii Community Development Authority
Wilson Okamoto & Associates, Inc.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 154
HONOLULU, HAWAII 96810

February 10, 1993

Mr. Joseph K. Conant

-2-

February 10, 1993

There are no available locations for another school site within the area. Combined with other developments in the Kakaako area and within the school service areas of all three schools, enrollment is projected to greatly increase in the future at all three schools.

2) The scenic views from the McKinley campus will be greatly altered and deteriorated due to the high rise towers. No other towers are present on the campus site. Although other towers are proposed adjacent to the campus on Pensacola Street and on Kapiolani Boulevard those projects are delineated by the streets. This project encroaches on the natural beauty of the adjacent campus which is identified on the National and State Register of Historic Places. The view corridors mentioned on Page 25 will certainly be obstructed. The setback will be away from the street but forces development of high rises toward the school.

3) The noise impacts and vibration impacts are to be included in the draft Environmental Impact Statement (Page 18). The statement that pile driving will generate significant noise is a serious cause for concern since the lives of many McKinley High School students will be affected. We will await the studies to be published before providing additional comments. The high probability that future residents of the project will complain about school-generated noise is not addressed since the provision that units are designed to accommodate air conditioning units does not assure that they will eliminate complaints.

Regarding ground vibrations during construction, there should be not even the remotest possibility that historic buildings can be damaged by the vibrations.

4) We disagree with the statement on Page 23 that "The project itself should not significantly change traffic conditions in the vicinity of the project." The argument that the Nauru Company project will increase traffic volumes in this area indicates there is a traffic concern for the school which will only be aggravated by the subject project.

MEMO TO: Mr. Joseph K. Conant, Executive Director
Housing Finance & Development Corp., DB&F

A T T N: Mr. Mike McElroy

F R O M: Charles T. Toguchi, Superintendent
Department of Education

SUBJECT: Environmental Impact Statement Preparation Notice (EISP) of
Hale Kewalo (KCC-McKinley) Rental Housing Mixed-Use
Development THK: 2-3-09: 1

The Department of Education (DOE) has reviewed the subject document proposing development of two concrete towers on the former McKinley High School campus. It is interesting to note that the EISP is more brief than the draft Environmental Assessment (EA) prepared in August, 1992. We have the following comments:

1) The projected enrollment growth from the project is significant at the three schools:

School	Grades	Projected Students
Kaahumanu Elementary	K-5	95
Central Intermediate	6-8	32
McKinley High School	9-12	42

Kaahumanu Elementary School is already operating at capacity. There is no available land for any additional building or portable classrooms on the existing campus. An increase of 95 students over an existing enrollment of 704 students is not marginal as stated on Page 22 but significant since no expansion alternatives exist.

Mr. Joseph K. Conant

-3-

February 10, 1993

5) In Section V - Alternatives to the Proposed Action - alternative uses of the site being considered by the DOE are valid even though no definitive plans by the DOE have been made. As plans in the Kakaako area become more definite, so will DOE plans. In the final analysis, the "No Action" Alternative or the Alternative Uses option are preferable for building a high rise on a site which has always been used for educational purposes. Other sites can provide alternatives to the subject location for housing.

The DOE will await more information which is to be provided in the Draft EIS and comment on the studies to be forthcoming.

CTT:hy

cc: A. Suga, Asst. Supt.
E. Masagatani, HDO
B. Choy, OEQC
H. Edwards, HCDA
Wilson, Okamoto & Assoc., Inc.



DEPARTMENT OF EDUCATION
STATE OF HAWAII



John D. Wahne
Executive Director

Cory Caulfield
Assistant Director

Michael N. Scarfene
Assistant Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 587-2670
Facsimile
(808) 586-2613

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable Charles T. Toguchi
Superintendent
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Mr. Toguchi:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 10, 1993 commenting on the subject EISPN.

The Environmental Assessment (EA) accompanying the EIS Preparation Notice complies with the content and format requirements specified by Chapter 343, Hawaii Revised Statutes and the State EIS rules. The previous EAS for the project went beyond these content requirements as they were prepared using the EIS format. The EIS Preparation Notice is intended to identify issues that need to be addressed in the EIS.

We offer the following responses in the respective order of your comments:

1. The projected enrollment growth you have provided is inconsistent with the projections we have made based on the latest (2/10/93) ratios provided by your Department. Based on the number and types of proposed units, our projections are as follows:

Grade K-5	72 students
Grade 6-8	9 students
Grade 9-12	27 students

The difference may be attributable to the exclusion of studio units from our calculations which, according to DOE standards, have a negligible impact on student counts.

We will include in the DEIS your observation that Kaahumanu Elementary is currently operating at capacity. At the same time we will refrain from attempting to characterize the impact, be it "marginal" or "significant," that the project may ultimately have on existing schools.

Unfortunately, we have been unable to receive definitive information from the DOE on how the potential demand generated by the Kakaako District is being reconciled with overall demand from other areas served by Kaahumanu, Royal, and other schools in the area. As you are aware, much of the service areas for these schools is comprised of stable, older neighborhoods. Arguably, declining demand on school facilities from these areas may serve to offset gains that might be attributable to the Hale Kewalo project. For example, our examination of school enrollment data appears to indicate that enrollment at both Kaahumanu and McKinley has been steadily declining in recent years. At McKinley High School, enrollment is at an all time low of 1,972 students. Likewise, enrollment at Kaahumanu Elementary has dropped from 837 in 1988 to 704 in 1992.

Given these uncertainties, we have been encouraged by the recent steps taken by the DOE toward the preparation of an Action Plan for Honolulu District school facilities. This effort should prove useful not only in improving methods for forecasting demand, but also in defining possible options and strategies to meet the area's long term educational needs. We look forward to working with the DOE in this important initiative.

2. In the broader urban design context, public views from scenic vantage points or highly traveled areas are often targeted for protection. Thus, the view corridors along Pensacola Street and Kapiolani Boulevard have been protected by building setbacks. Also, the front view of the historic McKinley campus from King Street, which has been identified and assessed as an important vista, will not be compromised. While the aesthetic character of

specific locations within the McKinley High School campus may change as a result of the towers, such locations are not identifiable as important scenic vantage points or view corridors.

3. The noise and vibration study has been included in the Draft EIS. As explained in the EIS Preparation Notice, vibration from pile driving will be monitored to detect any possibility that it may reach a level that could damage surrounding buildings.

The social impact assessment to be included in the Draft EIS will address concerns regarding the extent to which complaints by project residents of noise from the high school may affect school activities. It should be noted that medium and high rise residential development in the vicinity of McKinley High School will inevitably occur as the Kakaako area undergoes redevelopment. This will increase the likelihood, in the long-run, for potential conflicts with the school. Further, if the proposed Hale Kewalo project is not built, the University of Hawaii still plans to build faculty housing on the site and private developers will be constructing a large residential high rise structure across Pensacola Street from the Hale Kewalo site.

At Hale Kewalo, a provision in the rental agreements will apprise tenants that they may be subjected to noise impacts from the high school. While this may not entirely prevent tenants from complaining, it provides the school with an advantage in addressing those complaints. It should also be noted that the State Department of Health rules were changed in 1989 such that complaints against schools are not valid while normal school activities are underway between 7 A.M. and 10 P.M.

4. The traffic assessment prepared for the project indicates little difference in impact on the key intersections (during peak weekday traffic hours) between the existing functions at the project site and the proposed project. Because of the high

The Honorable Charles T. Toguchi
Page 4
March 29, 1993

capacity of these intersections, the contribution of traffic from the project site, in either case, is relatively small and so is the relative difference between them. The large Nauru project will have a more significant impact on traffic at these intersections because its contribution to traffic would be much greater. Any use of the project site which generates more peak hour trips than the existing use would "aggravate" traffic; the important issue is the magnitude of the difference relative to the capacity of the key intersections.

5. Neither the previous EA nor the EIS Preparation Notice suggest that potential alternative uses of the project site lack validity. Both documents discuss the opportunity presented at the site for addressing multiple community needs, including those related to affordable housing, higher education, education and recreation. Should the "no action" alternative be pursued, the land will revert to the University of Hawaii which intends to seek private sector development of faculty housing through the Request for Proposal (RFP) process, and return of ETO functions to the site.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

PHONE NUMBER
EXTENSION NUMBER



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 511
HONOLULU, HAWAII 96813

LIST OF ADOPTED NATIONAL STANDARDS

John P. Keppeler, II
Dona L. Hanaike

REGULATORY DEVELOPMENT
PLANNING
POLICY ANALYSIS
ENVIRONMENTAL ASSESSMENT
CONSTRUCTION AND
OPERATIONS MANAGEMENT
CONTRACTS ADMINISTRATION
PROPERTY ACQUISITION
PROGRAMS
SPECIAL INVESTIGATION
SPECIAL REPORTS
SPECIAL STUDIES

File No.: 93-388
DOC. ID.: 2255

FEB 19 1993

REF: OCEAN:KCK

Mr. Joseph K. Conant, Executive Director
Housing Finance and Development Corporation
Suite 300
677 Queen Street
Honolulu, Hawaii 96813

Dear Mr. Conant:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for
the Hale Kewalo (KCC-McKinley) Rental Housing Mixed-Use
Development, Honolulu, Oahu, TRK No.: 2-3-09: 1

We have reviewed the EISPN information for the subject project transmitted
by your letter dated January 15, 1993, and have no comments to offer at
this time.

We will forward our Department's Historic Preservation Division comments
to you when they become available.

Thank you for the opportunity to comment on this matter.

Please feel free to call Steve Tagawa at our Office of Conservation and
Environmental Affairs, at 537-0377, should you have any questions.

Very truly yours,

John P. Keppeler, II
JOHN P. KEPPERER, II
Acting Chairperson

cc: HCDA
OEOC
Earl Matsukawa



John D. Washet
Chairman

Cary Caulfield
Chairman

Michael N. Scurfine
Executive Director

27 Ala. Matsukawa
Suite 501
Honolulu, Hawaii
96813
Telephone
(808) 537-2870
Facsimile
(808) 537-2111

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable John P. Keppeler, II
Acting Chairperson
Department of Land and Natural
Resources
State of Hawaii
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Keppeler:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 19, 1993
indicating that you have no comment on the subject EISPN.
Although we have not as of this date received comments
from the State Historic Preservation Division on the
EISPN, the Division did previously provide comments on
the project. Their letter of April 3, 1992 commented on
the Project Eligibility Application while a subsequent
letter of September 23, 1992 commented on the Draft
Environmental Assessment.

All correspondence between your department and the
HCDA pertaining to the environmental impact review
process will be included in the Draft EIS. We appreciate
your interest and participation in the consultation phase
of the environmental review process.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA



UNIVERSITY OF HAWAII

VICE PRESIDENT FOR FINANCE AND OPERATIONS

January 26, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Hale Kewalo Rental Housing Mixed-Use Development,
Environmental Impact Statement Preparation Notice (EISPN)

We have reviewed the referenced EISPN and have the following comments to provide:

1. The "no action" alternative should be revised and expanded. The Executive Order conveying the project site to the Hawaii Community Development Authority (HCDA) clearly indicates that if the project should not go forward, the land will revert to the University of Hawaii (UH). In that event, the UH will resume its earlier efforts to provide faculty housing on this site in conjunction with private sector initiated development through a Request for Proposals (RFP) process. The previously existing Employment Training Office (ETO) programs would also be returned to the site.
2. The alternative uses section should likewise be expanded to include and address a range of alternate uses for Building 857 and the fifty (50) additional parking spaces that were originally negotiated with the Department of Education (DOE). Inasmuch as that agreement has been abrogated by the DOE, we will be exploring alternate uses for these facilities with the HCDA. Since we have been unable to identify the cost impacts associated with the delay of this project, one alternative which will be seriously considered is the renovation of Building 857 to accommodate various programs located in private office space in the Honolulu area. This additional revenue source could be critical in providing sufficient cash flow from the project to support an increased revenue bond requirement caused by the delay in implementing this project.

244 DOLE STREET • BACHMANN HALL • HONOLULU, HAWAII 96822 • TEL 808/956-6903 • FAX 808/956-9212
AN EQUAL OPPORTUNITY EMPLOYER / AFFIRMATIVE ACTION INSTITUTION

Mr. Mike McElroy
January 26, 1993
Page Two

Thank you for this opportunity to comment on this EISPN. We look forward to reviewing this draft EIS.

Sincerely,

Ralph T. Horii, Jr.
Ralph T. Horii, Jr.
Vice President for Finance
and Operations

c: Mr. Harold Edwards, Hawaii Community
Development Authority
Mr. Brian J.J. Choy, Office of
Environmental Quality Control
Mr. Earl Matsukawa, Wilson Okamoto
& Associates, Inc.
Interim President Paul Yuen



STATE OF HAWAII



KAKA'AKO
Kauai Community College

John D. Walker
President

Gary Caulfield
Vice President

Michael N. Suter
Executive Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Mr. Ralph T. Horii, Jr.
Vice President for Finance and
Operations
University of Hawaii
State of Hawaii
2444 Dole Street, Bachman Hall
Honolulu, Hawaii 96822

Dear Mr. Horii:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of January 26, 1993
commenting on the subject EISPN. We offer the following
responses in the respective order of your comments.

We appreciate your clarification of plans for the
project site if the Hale Kewalo project is not built.
Our discussion of the "no action" alternative will be
revised and expanded accordingly. Likewise, with respect
to the alternative use of Building 857, we will include
discussion on the possibility that the structure may be
renovated to accommodate University programs currently
located elsewhere.

We hope that we have adequately responded to your
comments. Your letter, together with this response, will
be included in the Draft EIS. We appreciate your
interest and participation in the consultation phase of
the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

CC: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

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BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU



February 1, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
Suite 300
677 Queen Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Your Letter of January 15, 1993 Regarding Environmental Impact Statement Preparation Notice (EISPN) for the Proposed Hale Kewalo (KCC-McKinley) Rental Housing Mixed-Use Development. TMK: 2-3-09: 01, Pensacola Street.

Thank you for allowing us to comment on the EISPN for the proposed Hale Kewalo Development Project. We have the following comments:

1. The existing water system is adequate to accommodate the proposed project. There are two water meters currently serving the project site.
2. As stated in the EISPN, the developer will be required to obtain a water allocation from the Department of Land and Natural Resources.
3. The availability of additional water will be confirmed when the building permit application is submitted for our review and approval. If additional water is made available, the applicant will be required to pay the prevailing Water System Facilities Charges and any applicable meter installation charges.
4. If a three-inch or larger meter is required, the construction drawings showing the installation of the meter should be submitted for our review and approval.
5. The developer should utilize drought tolerant plants for landscaping purposes.

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU



Mr. Mike McElroy
Page 2
February 1, 1993

6. Board of Water Supply approved reduced pressure principle backflow prevention assemblies should be installed on the domestic water lines immediately after the property valves and prior to any branch piping.

If you have any questions, please contact Bert Kuiuoka at 527-5235.

Very truly yours,

F: KAZU HAYASHIDA
Manager and Chief Engineer

cc: Hawaii Community Development Authority
Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.



HAWAIIAN ISLANDS WATER CONSERVATION COMMISSION



KAKA'AO
Water Wastewater Control Authority

John D. Walker
Executive Director

Gary Caulfield
Chairman

Michael N. Scudiere
Executive Director

Ref. No.: PL GEN 1.15b-2

March 29, 1993

Mr. Kazu Hayashida
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South King Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Re: Hale Kewalo Rental Housing Mixed-Use
Developmental Impact Statement Preparation
Environmental Impact Statement Preparation
Notice (EISPH)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 1, 1993 commenting on the subject EISPH. We appreciate your verification that the existing water distribution system is presently adequate to accommodate the proposed project. We will comply with all requirements and recommendations as stated in your letter.

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

27 All Rights Reserved
Kaka'ao
Water Wastewater Control Authority
630 South King Street
Honolulu, Hawaii 96813
Tel: 808-534-2111

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU

430 SOUTH KING STREET
HONOLULU, HAWAII 96813 • (808) 523-4432



DONALD A. CLEGG
DIRECTOR
LORESTAR C. CHIEE
SENIOR ASSISTANT

93-00371(JT)

February 22, 1993

Mr. Mike McElroy
Housing Finance and
Development Corporation
Suite 300
677 Queen Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Hale Kewalo Rental Housing Mixed-Use Development
Environmental Impact Statement Preparation Notice (EISPN)
Tax Map Key: 2-3-09; POK. 1

We have reviewed the above mentioned document and offer the following comments:

1. The Draft Environmental Impact Statement (DEIS) should include comments received on the previous Draft Environmental Assessment (DEA). The project description is essentially the same as proposed in the DEA, therefore, previous comments should be relevant. Responses to comments received should also be included. Perhaps they could be included as an Appendix to the DEIS.

In addition, appropriate revisions should be made to the content of the DEIS to reflect comments received on the DEA. Our department made several comments to the DEA. We have attached a copy of that letter (dated September 25, 1992) for your use.

2. The DEIS should describe how the broader community's housing needs would be met by the proposed 530 rental apartments. A breakdown of the number of units allocated for faculty and various income groups should be included.
3. The DEIS should include a statement of the relationship of the proposed action to land use plans, policies and controls for the affected area.

Mr. Mike McElroy
Page 2
February 22, 1993

DEIS should identify the effected programs, where they will be relocated, and discuss any mitigation if relocation cannot be found.

5. The EISPN (page 21) indicates that while the proposed project will increase the residential population of the area by 19 to 22 percent, demand on public facilities will be increased marginally. The DEIS should include an explanation to support this conclusion.
6. On page 24, the EISPN states that "on-street parking should be removed from the Ewa side of Pensacola Street along the project frontage. ... Also, the one midblock on-street parking section along the Diamond Head side of Pensacola Street in the block mauka of Kamaile Street should be eliminated...". The eliminated parking spaces should be counted in the calculation of net parking spaces generated by the proposed development. This information should be included in the description of how parking demands will be met by the project.

7. Alternatives to the proposed development should be described and evaluated in the DEIS.
8. The DEIS should include discussion of the relationship between local short term uses of the environment and the maintenance and enhancement of long-term productivity.
9. The DEIS should include discussion of irreversible and irretrievable commitments of resources that would be involved in the implementation of the project.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Joan Takano of our staff at 527-5038.

Very truly yours,

DONALD A. CLEGG
Director of Land Utilization

DAC:smc
Attach.
cc: HCDA
OEQC
Wilson Okamoto & Associates, Inc.
A:eisepn.jht



John D. Walker
Director

Cary Caulfield
Assistant Director

Mahealani Scarfone
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable Donald A. Clegg
Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EISPN. We offer the following responses in the respective order of your comments:

1. All comments received in relation to the previous Environmental Assessments and the EIS Preparation Notice, as well as our responses to those comments, will be included in the Draft EIS. The Draft EIS will reflect changes based on comments received, as deemed appropriate.
2. The social impact assessment to be included in the Draft EIS will address the role of the proposed rental units in addressing housing needs.
3. The Draft EIS will include a discussion of the relationship of the proposed action to land use plans, policies and controls. Please note that this discussion was included in the previous EA, although it was omitted from the EIS Preparation Notice.
4. The University of Hawaii is coordinating the relocation of programs housed at the site. At this time it is uncertain whether any programs that must be permanently or temporarily relocated will encounter any significant problems that would be considered a social impact on the community.

27-10 Maunaloa Blvd
Honolulu, Hawaii 96813
Telephone: (808) 521-2000
Facsimile: (808) 521-2011

The Honorable Donald A. Clegg
Page 2
March 29, 1993

5. The DEIS will place into context the growth in residential population in relation to systems which provide public facilities as a basis for supporting our contention that the project's impact on public facilities is marginal.
 6. The Hale Kewalo project will provide a total of 716 parking spaces within the development. This exceeds the HCDA's requirement of 662 spaces for the various uses by 54 spaces. By comparison, 10 to 12 unmarked on-street parking spaces will be lost as a result of prohibiting parking on the Ewa side of Pensacola Street along the project site, and another 3 to 4 spaces will be lost by prohibiting parking on the Diamond Head side of Pensacola, immediately mauka of Kamaile Street. Parking demands in the area will be addressed by the planned expansion of the municipal parking garage at Neal Blaisdell Center where an additional 400-600 stalls will be built. The HCDA is also planning to build a multi-story parking garage at the corner of Pensacola and Waimanu Streets, where a 140-stall at-grade public parking lot is currently located.
- 7-9. All of the items you refer to are required by Chapter 343, HRS and State (Department of Health) Administrative Rules. They will be included in the Draft EIS.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

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



FRANKIE PARR
MAIL ROOM

WALTER M. OZAWA
DIRECTOR
ALVIN C. AU
DEPUTY DIRECTOR



John D. Wabner
Assistant Director

Carry Caulfield
Assistant Director

Michael N. Scarfione
Assistant Director

February 22, 1993

Mr. Mike McElroy
Housing Finance and
Development Corporation
Department of Budget and Finance
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Hale Kewalo Rental Housing Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key 2-3-09: 01
Honolulu, Oahu, Hawaii

Thank you for providing us with this opportunity to comment on the EISPN for the Hale Kewalo rental housing development project.

We are unable to assess the recreational needs of the mixed-use residential project because details are not provided for the open space or park area. We would recommend as a supplement to this area, a recreational/community facility be included in the affordable and faculty residential towers.

Should you have any questions, please call John Horiyara of our Advance Planning Branch at 523-4246.

Sincerely,

WALTER M. OZAWA, Director

WMO:ei

cc: Office of Environmental Quality Control
Wilson Okamoto and Associates, Inc. (Earl Matsukawa)

677 Ala Moana Boulevard and
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 537-2600
Facsimile
(808) 537-2611

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable Walter M. Ozawa
Director
Department of Parks and
Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Ozawa:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EISPN.

The proposed 1-3/4 acre park/open space along Kapiolani Boulevard is intended to serve as a recreational resource for the community. Potential use of the park may range from an extension of the McKinley High School athletic field to a public park with parking available on weekends in the adjoining ETO parking lot along Pensacola Street. The park could also be dedicated to the City for general public use. Future alternatives for facilities could range from those serving high school athletes to active public recreational facilities such as courts and playing fields, to passive landscaped open space. The determination as to how this space will ultimately be used will be deferred pending further discussion with McKinley High School and your Department.

Based on your comments we will also clarify in the Draft EIS that the project also includes a 35,988 square foot recreational facility for use by Hale Kewalo tenants. This is approximately 5,000 square feet greater than the required allotment under HCDA rules. Designed as a recreation deck, it will include numerous facilities, such as a tot lot, exercise area, barbeque, meeting/conference room, basketball/volleyball court and trellised and grassed areas.

We Add Quality to Life

The Honorable Walter M. Ozawa
Page 2
March 29, 1993

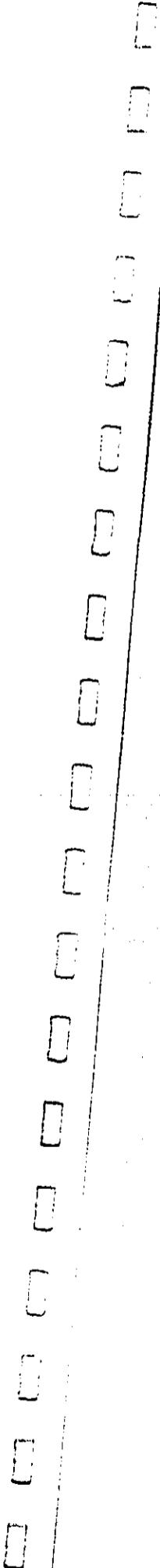
Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU

800 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK J. FARR
WATER

C. MICHAEL STREET
200 SOUTH KING STREET
FELIX B. LAMINALCO
DEPUTY DIRECTOR

ENV 93-46

February 23, 1993

Mr. Mike McElroy
Housing Finance and Development
Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Environmental Impact Statement Preparation Notice (EISP)
Hale Kewalo Rental Housing Mixed-use Development
XMR:2-3-92:1

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

1. Standard property line corner rounding may be required at the intersection of Kapiolani Boulevard and Pensacola Street.
2. The EISP should address the impact of storm water discharge associated with construction activities on water quality of the receiving waters.
3. The EISP should also state what structural or non-structural best management practices (BMP) will be provided to control and reduce the discharge of pollutants as outlined in the National Pollutant Discharge Elimination System (NPDES) regulations (40 CFR Part 122, Subpart B for municipal storm sewer system).
4. For your information, construction dewatering permits will be required by the State Department of Health as well as the Department of Public Works, City and County of Honolulu, if dewatering activity is anticipated during the construction.

Mr. Mike McElroy
Page 2
February 23, 1993

5. The Division of Wastewater Management granted sewer connection approval on February 13, 1992 for 522 units only, not 530 units as stated in the EISP.

Should there be any questions, please contact Alex Ho, telephone 523-4150.

Very truly yours,
C. Michael Street

C. MICHAEL STREET
Director and Chief Engineer

cc: Hawaii Community Development Authority

CORRECTION

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

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



PLM:K:K:K:K
1/27/93

C. MICHAEL STREET
FELIX LANTICO
SENIOR DESIGNER

ENV 93-46

February 23, 1993

Mr. Mike McElroy
Housing Finance and Development
Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Environmental Impact Statement Preparation Notice (EISPN)
Hala Kawaio Rental Housing Mixed-use Development
TKK:2-1-02:1

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

1. Standard property line corner rounding may be required at the intersection of Kapiolani Boulevard and Pensacola Street.
2. The EISPN should address the impact of storm water discharge associated with construction activities on water quality of the receiving waters.
3. The EISPN should also state what structural or non-structural best management practices (BMP) will be provided to control and reduce the discharge of pollutants as outlined in the National Pollutant Discharge Elimination System (NPDES) regulations (40 CFR Part 122, Subpart B for municipal storm sewer system).
4. For your information, construction dewatering permits will be required by the State Department of Health as well as the Department of Public Works, City and County of Honolulu, if dewatering activity is anticipated during the construction.

Mr. Mike McElroy
Page 2
February 23, 1993

5. The Division of Wastewater Management granted sewer connection approval on February 13, 1992 for 522 units only, not 530 units as stated in the EISPN.

Should there be any questions, please contact Alex Ho, telephone 523-4150.

Very truly yours,
C. Michael Street

C. MICHAEL STREET
Director and Chief Engineer

cc: Hawaii Community Development Authority



DEPARTMENT OF PUBLIC WORKS



KAKAKO
KAWAHAU COUNTY PUBLIC WORKS

John D. Walker
County Engineer

Gary Caulfield
Assistant Engineer

Michael N. Scudiere
Assistant Engineer

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable C. Michael Street
Director and Chief Engineer
Department of Public Works
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Street:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 23, 1993 commenting on the subject EISPN. We offer the following responses in the respective order of your comments:

1. We will comply with City standards for property line corner rounding.
2. Long-term and short-term impacts on storm water discharge will be addressed in the Draft EIS.
3. Since the portion of the project site to be developed is under 5 acres (the project site is 5.3 acres, but excluding the site occupied by Building 857, which will be preserved, the area to be developed will be approximately 3 acres), it is not anticipated that an NPDES permit will be required. However, if a change in regulations deems otherwise, a best management practices (BMP) plan will be prepared.
4. The contractor will comply with all permit requirements, including those for construction dewatering activities, if necessary.
5. The unit counts provided in the EISPN are approximate. We acknowledge, however, the requirement for a sewer connection approval and will make an official request if the final unit count deviates from the currently approved count.

67-10-1000-0000-000
State of Hawaii
Honolulu, Hawaii
Telephone
808/535-2000
Fax Number
808/535-2111

The Honorable C. Michael Street
Page 2
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

HONOLULU MUNICIPAL BUILDING
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK P. TAYLOR
DIRECTOR

JOSEPH M. MAGALDI, JR.
DIRECTOR

AMAR SAPPAL
DEPUTY DIRECTOR

TE-268
PL93.1.019

February 18, 1993

Mr. Mike McElroy
Housing Finance and
Development Corporation
Suite 300
677 Queen Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Hale Kewalo Rental Housing
Developmental Impact Statement
Preparation Notice (EISPN)
THK: 2-3-09: 1

This is in response to the EISPN submitted to us for review on
January 15, 1993 by the Hawaii Community Development Authority.

The proposed driveway servicing the parking structure should be
relocated mauka and aligned with Kamalle Street. This access
should be a curbed cut driveway. Signalization, signing, and
striping at the new driveway access/Pensacola Street/Kamalle
Street intersection should be provided.

Should you have any questions, please contact Lance Watanabe of
my staff at 523-4199.

Sincerely,

JOSEPH M. MAGALDI, JR.
Director

cc: Hawaii Community Development Authority
Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.



HAWAIIAN
TRANSPORTATION
SERVICES



KAKAKO
Hawaii's Community Development Authority

John D. Walker
Director

Cary Crutfield
Assistant Director

Alfred N. Sordani
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable Joseph Magaldi, Jr.
Director
Department of Transportation
Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Magaldi:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii


Thank you for your letter of February 18, 1993
commenting on the subject EISPN. Your recommendation to
realign the project driveway to lie opposite Kamalle
Street concerns us because it would affect Building 857
which is intended to be retained. We have, however,
forwarded your recommendation to our project engineers
for their consideration. We recognize that realigning
the driveway would facilitate access from the project
site to the H-1 freeway, via Kamalle Street and Piikoi
Street. Our traffic engineer has advised us, however,
that the installation of a traffic signal on Pensacola
Street this close to the Kapiolani Boulevard signal could
adversely affect the efficient use of the existing
signal, and would require careful synchronization of
timing of the two signals to minimize such effects. We
look forward to discussing the various options available
with you as we proceed with design development.

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 527-2600
Facsimile
(808) 527-2611

The Honorable Joseph Magaldi, Jr.
Page 2
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HOA



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



ROBIN FOSTER
CHIEF PLANNING OFFICER
ROLAND LIBBY, JR.
DEPUTY CHIEF PLANNING OFFICER
TH 1/93-158

FRANK FESI
-31008

February 8, 1993

Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Attention: Mr. Mike McElroy

Gentlemen:

Hale Kewalo (KCC-McKinley) Rental Housing
Mixed-Use Development, Environmental Impact
Statement Preparation Notice (EISPN),
Honolulu, Oahu, Hawaii. Tax Map Key: 2-3-09: 1

In response to a letter dated January 15, 1993 from the
Hawaii Community Development Authority, we have reviewed the
subject EISPN. We have no additional comments to add to our
initial comments of October 2, 1992 regarding the Draft
Environmental Assessment for the proposed project.

Thank you for the opportunity to comment on this matter.
Should you have any questions, please contact Tim Hata of our
staff at 527-6070.

Sincerely,

ROBIN FOSTER
Chief Planning Officer

RF:lh

cc: Hawaii Community Development Authority
Attn: Mr. Harold Edwards
Office of Environmental Quality Control
Attn: Mr. Brian J. J. Choy
Wilson Okamoto & Associates, Inc.
Attn: Mr. Earl Matsukawa



HAWAII STATE DEPARTMENT
OF LAND AND NATURAL RESOURCES



KAKAWA
Hawaii's Renewable Energy Program

John D. Waite
Director

Gary Caulfield
Assistant Director

Michael N. Scalfone
Assistant Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
595-5625
Facsimile
595-3963

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable Robin Foster
Chief Planning Officer
Planning Department
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Foster:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 8, 1993
indicating that you have no additional comments on the
subject EISPN. As a follow-up to your Department's
previous comments of October 2, 1992, we offer following.

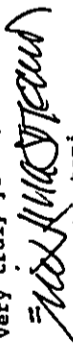
1. After we received your Department's earlier letter,
the Fire Department was contacted to apprise them
of the proposed project. They were also contacted
in conjunction with the preparation of the social
impact assessment for the project by Earthplan.
The Fire Department will also be included on the
list of parties to be consulted in conjunction with
public review of the Draft EIS.
2. It is anticipated that the project will account for
approximately 27 students of high school age
(grades 9-12). Meanwhile, through conveyance of
Building 857 to the DOE, the project will provide
an additional 40,000 square feet potentially
available for use by McKinley High School. The
latter is in addition to the 35,000 square feet of
new classroom space proposed for construction
within the existing campus under the McKinley High
School Campus Development Report (DAGS, 1981).
Significantly, Building 857 would only be available
to DOE under the current proposal. If the Hale
Kewalo project is abandoned, the University will
use it for other purposes.

The Honorable Robin Foster

Page 2
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA





MAKIKI/LOWER PUNCHBOWL/TANTALUS NEIGHBORHOOD BOARD NO. 10
c/o NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

MAKIKI/LOWER PUNCHBOWL/TANTALUS
NEIGHBORHOOD BOARD NO. 10
FEBRUARY 22, 1993
PAGE 2

February 22, 1993

Housing, Finance and Development Corp.
State of Hawaii
677 Queen Street Suite 300
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Hale Kevalo Rental Mixed Use Development EIS
Preparation Notice

The Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10 wishes to be a consulted party for the Hale Kevalo EIS.

The loss of Hale Kevalo site for educational use should be assessed on McKinley High School's activities in the forthcoming EIS. McKinley is the only school in Hawaii that has two Learning Centers, Business and Humanities, which are a local variant of the mainland magnet school concepts. In addition, McKinley is expanding its Business Learning Center with the opening of an Academy of Finance in September 1993. Mentorship and work/study are planned features of the Academy which are made possible because of McKinley's location between downtown and Ala Moana Center.

Learning Centers are open to students in and out of a particular attendance boundary. However, the students from outside of school attendance boundaries will not be able to attend the learning centers with a full school enrollment of students within the school boundary.

Hale Kevalo site is the only State land that is available for educational use within the Honolulu business area that is easily accessible to public transportation. With increased student population in and outside the school's boundary, the school facilities will need to be expanded. The State Department of Education's enrollment projections for McKinley are based on the student enrollment in the feeder intermediate schools that are only in the McKinley area.

Thank you for your consideration.

Sincerely,
John Steelquist
John Steelquist
Chair

cc: Hawaii Community Development Authority
Wilson, Okamoto and Associates
Councilmember Andy Hirikitan
Senator Carol Fukunaga
Representative Rod Tam
Representative Jim Shon



Oahu's Neighborhood Board System-Established 1973



DEPARTMENT OF EDUCATION
MOKULUANA KULUWANI KULUWANI



KAKAIAO
KAKAIAO HAWAII

John D. Walker
Superintendent

Cary Caulfield
Assistant Superintendent

Mark N. Sweeney
Assistant Superintendent

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Mr. John Steelquist
Chair
Makiki/Lower Punchbowl/Tantalus
Neighborhood Board No. 10
c/o Neighborhood Commission
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Mr. Steelquist:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPH)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EISPH. We offer the following responses in the respective order of your comments:

1. The Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10 will be included as a consulted party during the public review period for the Draft EIS.
2. We appreciate the value of the innovative academic programs offered at McKinley High School. There is no basis, however, for suggesting that these programs will be "lost" as a result of the Hale Kewalo project since there are no DOE plans for locating them on this site. The EIS is not intended to address the preclusion of every conceivable use that could be made of a site.
3. Your assumption that McKinley High School facilities will in the future need to be expanded is questionable. The DOE's only study relating to planning facility needs at the high school, the McKinley High School Campus Development Report (1981) by the Department of General Services (DAGS), suggests that 35,000 square feet of new classroom space should eventually be provided to accommodate a population of 2,400 students at the high school. Currently, the enrollment at the high school is 1,972 students. The 35,000 square feet of new classroom space would be constructed within

Mr. Alana Baker
Superintendent
Honolulu, Hawaii
1993
Telephone: (808) 551-5200
Fax: (808) 551-5200
Date: 3/29/93

Mr. John Steelquist
Page Two
March 29, 1993

the existing campus. If Building 857, (which under the project will be conveyed to the DOE) is used by McKinley High School, an additional 40,000 square feet of Classroom space beyond the stated requirements would be available. Building 857 would only be available to the DOE under the current proposal. If the Hale Kewalo project is abandoned, the University has indicated that it plans to use the structure for other purposes.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WDA





HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

February 22, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
Suite 300
677 Queen Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

I am pleased to learn that your office has withdrawn the previous Final Environmental Assessment/Negative Declaration filed on October 27, 1992.

I have reviewed the Hale Kewalo Rental Housing Mixed-Used Environmental Impact Statement Preparation Notice, dated January 1993, which was prepared in accordance with Chapter 343, Hawaii Revised Statutes, and with Title 11, Chapter 200, Administrative Rules, Department of Health, State of Hawaii, and submit the following comments pursuant to Section 11-200-15, Hawaii Administrative Rules:

Firstly, I repeat that I firmly support and commend the State and its agencies on the construction of affordable rental units. However, I believe that construction of the proposed two residential high rise towers for the Hale Kewalo project will have a significant negative impact on the educational facility and on the socio-economic environment of the community.

The Hale Kewalo project will add from 900 to 1,1040 new residents to the area, an increase in residential population by 19% to 22%. This will be in addition to the projected addition of 19,000 residential living units as designated in the Mauka Area Plan and another 1,800 residential living units which are planned in the Pawa Superblock project. The completion of the Nauru Towers will also add to the population of the community. Many of these new residents will have school-age children.

In spite of the overall population changes, the preparation notice claimed that there will only be marginal increases on public facilities including schools, streets, parks, and services such as police and fire protection and emergency health care.

With the projected growth in the area, the increase cannot be labeled "marginal". As part of the planned Kakaako Community Development District, the Hale Kewalo project must be considered with its cumulative effect upon the existing educational facilities and the environment.

I am in support of the retention of the 5.3 acres for the purpose of direct public education. The subject real property was originally set aside in 1921 by the Governor of the Territory of Hawaii in Executive Order 101 as a site for a public high school. I believe the Governor cannot now propose a mixed use for the property.

The preparation notice stated that there will be only a marginal increase in demand that will be generated by the proposed project to the adjacent McKinley High School. It is my understanding that McKinley and the nearby Kaahumanu Elementary School currently are both operating at maximum capacity. Hale Kewalo has projected an increase to enrollment of 42 students to McKinley and 95 students to Kaahumanu which will further add to the burden. However, the cumulative effect of the Kakaako Community Development District again must be considered. McKinley is the only public high school in the area between McCully Street and Houghtaling Street. There are no plans for the expansion of the school based on the projected increased needs nor have any alternatives been proposed.

I hope that my comments will be considered in the preparation of the Environmental Impact Statement for the Hale Kewalo Project. Section 11-200-15, Hawaii Administrative Rules, states that any substantive comments received by the proposing agency be responded to in writing by the proposing agency or applicant prior to the filing of the EIS with the approving agency. I look forward to hearing from your office.

Sincerely,

Cynthia Thielen

Cynthia Thielen
State Representative

cc: Brian Choy
Office of Environmental Quality Control
Harold Edwards
Hawaii Community Development Authority
Earl Matsukawa
Wilson Ukamoto & Associates, Inc.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKA'AKO
Where Hawaiian Culture Meets The Sea

John D. Walker
Commissioner

Cary Crawford
Assistant Commissioner

Michael N. Squire
Assistant Commissioner

Ref. No.: PL GEN 1.15b.2

March 29, 1993

The Honorable Cynthia Thielen
House of Representatives
State of Hawaii
State Capitol
Honolulu, Hawaii 96813

Dear Representative Thielen:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EISPN. We offer the following responses in the respective order of your comments:

1. The cumulative impact of redeveloping the Kakaako area was assessed in the Final Environmental Impact Statement for the Kakaako Community Development District Plan filed in June, 1983. Whether measured against the existing highly urbanized setting within which it is proposed, or within the context of the planned Kakaako redevelopment, the impacts of converting the existing ETO facility to the Hale Kewalo project on public services and facilities will be marginal. The overall impacts associated with the redevelopment of Kakaako are not caused by the proposed project nor is the project a prerequisite for the Kakaako redevelopment. Hence, while the broader context of cumulative impacts resulting from the ultimate redevelopment of Kakaako was referenced in the Environmental Assessment, it would not be appropriate to suggest that those impacts are attributable to the project.

2. We appreciate your position regarding the use of this site. However, as indicated in our previous letter to you, the Governor conveyed the project site to the HCDA by Executive Order No. 8567 pursuant to Chapter 206-EB, Hawaii Revised Statutes, which supersedes Executive Order No. 101. The EIS is being processed based on this action.

67 Ala Moana Boulevard
Suite 300
Honolulu, Hawaii
96813
Telephone
(808) 552-2600
Fax number
(808) 552-2611

The Honorable Cynthia Thielen
Page Two
March 29, 1993

3. Based on ratios provided by the DOE, the project is expected to generate the following demand:

Grade K-5 72 students
Grade 6-8 9 students
Grade 9-12 27 students


While the DOE has indicated that Kaahumanu Elementary is operating at capacity, McKinley High School has not been characterized as being in a similar situation. Moreover, pending more definitive information from the DOE on how future demand outside of the Kakaako District is being factored into school enrollment projections, it is difficult to predict with any degree of certainty the extent to which the Hale Kewalo project, when completed two years hence, would impact the facilities at Kaahumanu. Hopefully, the recent steps taken by the DOE toward the preparation of an Action Plan for Honolulu District School facilities will not only help to clarify this matter, but also serve to define meaningful options and strategies to deal with the area's long-term educational needs. We look forward to working with the DOE in this effort.

With respect to your concerns regarding the project's impact on the future expansion potential of McKinley High School, it should be noted that through the conveyance of Building 857 to the DOE, the project will provide an additional 40,000 square feet potentially available for use by the school. This is in addition to the 35,000 square feet of new classroom space proposed for construction under the McKinley High School Campus Development Report (DAGS, 1981). Significantly, Building 857 would only be available to the DOE under the current proposal. If the Hale Kewalo project is abandoned, the University has indicated that it plans to use the structure for other purposes.

The Honorable Cynthia Thielien
Page Three
March 29, 1993

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



STATE OF HAWAII
DEPARTMENT
OF
EDUCATION

McKinley High School

1089 SOUTH KING STREET • HONOLULU, HAWAII 96813 • TELEPHONE 534-1061

February 19, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, HI 96813

Dear Mr. McElroy,

We, the undersigned, teachers of McKinley High School, recognize potential adverse effects on McKinley High School campus and its users (staff, students, and the public) by the Hale Kewalo Housing Project. We think these effects should be addressed in detail in the Environmental Impact Statement. Further, we request that the EIS include references and documentation that support the responses of the Housing Finance and Development Corporation.

1. **POTENTIAL ADVERSE IMPACT** on the National Register, termite-infested buildings on McKinley High School campus by the construction of the twin towers.
Questions: How do you know that pile-driving and other construction won't hasten the deterioration of the Administration Building? You admit some potential (you say extremely low) for impact since you intend on monitoring the pile-driving phase. How do you know that this negligible impact won't damage any other structure? Are you willing to underwrite the cost for repairing and conserving the National Register property?

2. **POTENTIAL ADVERSE IMPACT** on the visual environment on the Historic Property by the construction of 26-story towers.

Questions: The proximity of these high towers to the campus exaggerates their height. Isn't that visual impingement on the historic property? Don't you realize that these towers will be ugly?

3. **POTENTIAL ADVERSE IMPACT** on the health of the Science building users due to increased fumes emitted from increased traffic on King and Pensacola Streets.

Questions: We are already suffering from the effects of exhaust and pollution outside of Science Building. You say that the increased traffic will have marginal impact? If the pollution index is marginal now, wouldn't the increase put the index into more unacceptable levels? How do you know that that marginal level won't affect our health? What are you going to do that will mitigate the effects of the nauseating fumes which are at their peak during school hours?

4. **POTENTIAL ADVERSE IMPACT** on the fiscal, logistics, and physical plant components of the McKinley campus due to increased multiple use by the public due to increased population at Hale Kewalo.

Mr. Mike McElroy
Page 2
February 19, 1992

Questions: With the increased population in the immediate area due to the construction of the housing project, public use of the McKinley facility is expected to increase. Who's going to pay for custodial, security, and maintenance over-time? How are the potential parking problems during events that occur on off hours such as Carnival, State Fair, and athletic tournaments going to be addressed? How will this project affect the financial situation of McKinley High School? What costs will McKinley be expected to share or assume? Will HCDA accept all unforeseen costs that are the direct or indirect result of the project?

What will be the changes on the physical plant of McKinley High School after construction? Will fences be added, taken down? Will new parking stalls be created? Will there be checkpoints at the entrances to McKinley to monitor parking passes?

5. **POTENTIAL ADVERSE IMPACT** on the maintenance responsibilities of McKinley High School and the Department of Education due to increased public use to McKinley.

Question: Again, who's going to pay for maintenance on the public facilities (McKinley High School)? McKinley High School can't be expected to shoulder all the costs. Will the state provide personnel to share with the maintenance of the McKinley campus?

6. **POTENTIAL ADVERSE IMPACT** on parking and traffic egress and entrance by McKinley High School staff and students during the construction of Hale Kewalo and after construction.

Questions: Where will we park during construction, where will we park after construction, and where will the construction workers park during construction?

How will construction not interfere with our commute to and from school? Do you know the time intervals that staff, faculty and students pull in and pull out of the Pensacola entrance?

How will the extant buildings at KCC be evacuated from the site or demolished without affecting the traffic at McKinley or without endangering students and faculty?

We request that the Environment Impact Statement document evidence and references that support your responses to these effects. We also request that a reference to studies be attached as appendix. We thank you for the opportunity to provide input to the E.I.S.

Sincerely,

Teachers at McKinley High School

Victoria Jampsey
 Richard Jaina
 Suzanne Scherer
 Jane Lijn
 Ann Aoki
 Julie Ayler
 Jan M. Yarnum
 LeRoy Ngai
 Sandra G. A. Long
 Milton R. Q. Lan
 Peter T. F. L. L.
 Tim Linn
 Joan Hayward
 Janie Shumkwin
 Henry H. A. A.
 Allen Edgerly
 Phannie K. A. A.
 Monica K. L. L.
 Rosalinda F. J. J.
 Donald R. L. L.
 May W. L. L.
 Linn O. Lee



HAWAIIAN LANGUAGE CENTER



KAKA'IKO
Kona Hawaii

John D. Walker

Gary Caulfield

Michael N. Scarfere

67 Alu Moku Building
 Suite 101
 Honolulu, Hawaii
 96813
 Telephone
 (808) 521-2000
 Facsimile
 (808) 521-2111

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Teachers at McKinley High School
 c/o McKinley High School
 1039 South King Street
 Honolulu, Hawaii 96814

Dear Teachers:

Re: Hale Kewalo Rental Housing Mixed-Use
 Development
 Environmental Impact Statement
 Preparation Notice (EISPH)
 Tax Map Key: 2-3-09:1
 Honolulu, Oahu, Hawaii

Thank you for your letter of February 19, 1993
 commenting on the subject EISPH. We offer the following
 responses in the respective order of your comments:

- Due to soil conditions prevalent throughout much of
 Honolulu, pile-driving is a common construction
 activity for multi-story buildings and has been
 routinely accomplished without damaging adjacent
 structures. Since the construction contractors
 would be liable for any damage caused by the pile
 driving and because historic structures are in the
 vicinity, experts were consulted regarding the
 possibility of causing damage to those structures
 during pile-driving. The experts concluded that
 the potential for damage is extremely low for the
 historic structures. Their primary concern
 centered on the caretaker's cottage which is not a
 historic building but is a fairly old wooden
 structure adjacent to the project site.
 Nevertheless, seismographic monitoring has been
 recommended to address the slim possibility that
 damage could be incurred. The threshold value
 recommended is ten times lower than the maximum for
 which no structural damage would result.
 Monitoring will be done during the test pile
 driving to determine the appropriate pile, pile
 driver and methods, such as pre-drilling, to be
 used for preventing damage to structures.
- In the urban design context, public views from
 scenic vantage points or highly traveled areas are
 often targeted for protection. Thus, the view

corridors along Pensacola Street and Kapiolani Boulevard have been protected by building setbacks. Also, the front view of the historic McKinley campus from King Street, which has been identified and assessed as an important vista, will not be compromised. While the aesthetic character of specific locations within the McKinley High School campus may change as a result of the towers, such locations are not identifiable as important scenic vantage points or view corridors. The State Historic Preservation Division has expressed its belief that the project "will have 'no effect' on the historic character of site 9926 (McKinley High School)."

3. The air quality problem you refer to does not appear to be one which is related to vehicular traffic. Based on prior studies conducted in Honolulu, the traffic generated air pollution concern centers on potential violations of the State air quality standards for carbon monoxide in public areas immediately adjacent to the busiest intersections, i.e. sidewalks, during peak traffic hours and very still wind conditions (1 meter/second or less). The chronic and persistent condition you refer to suggests that the condition may not be related to peak traffic and rare stable wind conditions. Other comments received suggest there have been health problems related to a noise abatement system installed in the Science Building.

The impact that the Hale Kewalo project will have on traffic at the King Steet/Pensacola Street intersection will be negligible, therefore this intersection was not examined in the traffic study. Based on 1991 traffic counts at this intersection, the increase in traffic will be less than 1 percent. The impact would be even smaller when traffic volumes at the intersection are projected to future conditions when the project is completed. Likewise, the impact on air quality resulting from project-generated traffic would also be negligible.

4. We do not understand your reference to the use of McKinley High School facilities by the residents of

Hale Kewalo. The project is not part of the high school campus. It is a mixed-use complex with its own recreational facilities and adjacent park/open space. Other than for students who may attend McKinley High School, or adults who may participate in adult education programs, there is no reason to believe that the school's facilities will be affected. We are unaware of any unforeseen costs that the school would be expected to bear as a result of the project.

The proposed project will exceed the HCDA standards for off-street parking for the residential and ETO uses. In addition, 50 stalls will be provided for use by the Department of Education on a 24-hour basis. The DOE could make these stalls available for use by the high school. It may also be possible to arrange for off-hour use of ETO parking. The vehicular entrance to the proposed project will be separate from access to the high school. There should be no reason for residents to enter the school campus other than for official business.

5. Again, we are unaware of any significant impacts that the proposed project will have on the maintenance of McKinley High School facilities.

6. To the extent possible, construction-related vehicles, including commuting construction worker's vehicles will be parked on the project site during construction. Occasional restriction of on-street parking may be required to accommodate delivery of construction materials. These are short term impacts which may result in some degree of inconvenience during construction.

Slow-moving construction vehicles and large vehicles delivering construction materials can impede traffic flow. Therefore, their movements will be coordinated to avoid peak traffic periods. Commuting construction workers may add to peak hour vehicular traffic, however this increase in traffic will be offset by the reduction in commuting traffic when the existing uses on the project site are relocated.

Teachers at McKinley High School
Page Four
March 29, 1993

Standard safety precautions will be observed during the demolition and removal of buildings. As in any construction project, the construction contractor is responsible for maintaining public safety at the construction site by providing barriers and warning signs in accordance with State and County requirements.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

February 22, 1993

Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813
ATTN: Mr. Mike McElroy

Dear Mr. McElroy,

Subject: Hale Kewalo Rental Housing Development As Planned For
The Corner of Kapiolani Boulevard And Pensacola Street
Environmental Impact Statement Concerns

We are happy to hear that the decision to circumvent the Environmental Impact Statement process has been reconsidered making it unnecessary to proceed with our lawsuit or the administrative hearings previously scheduled. We appreciate the notification received. We certainly hope that the same firm that authored the "Negative Declaration" dated October 1992 can objectively analyze the full spectrum of reasonable potential impacts in appropriate depth and with open objectivity in spite of having produced a written determination of Negative Declaration. We feel that the topics that follow in this letter should be addressed in any comprehensive and objective study of the impact on people of constructing residential high-rise buildings on a public school campus in a growing city.

1. Consideration should be given to alternative uses (short and long term) for the site what would result in a "highest and best use" of the site in the long term best interest of the public as a whole. This consideration is crucial since the proposed project would essentially preclude alternative uses on a highly central and very public activity oriented city block.

2. The site is the logical choice for temporary classrooms while the McKinley Administration building is reconstructed. The site may also be used to house other McKinley programs and classes. What are the alternatives?

3. With anticipated population growth of Honolulu, the number and capacity of recreational facilities needs to be a serious alternate consideration since the site could also be used as a joint educational and recreational facility (for example, as in Aiea)

4. Alternative sites for the affordable and faculty housing project is an important topic. Alternatives should not be limited to the current area of control of the HCDA or only locations directly in central Honolulu. Land costs are lower in areas outside of central Honolulu and may be more in tune with the objectives of the "Second City" concept. Also the wisdom of building University faculty housing that is not next to any campus needs to be discussed objectively and appropriate faculty preferences queried. Construction near the site of the West Oahu Campus may also be appropriate.

5. Alternative plans that accomplish the same goals are also important. For example, existing living units could be purchased for the faculty (often at lower costs) rather than building new units. Rebuilding of existing University buildings to higher densities are also another possibility. Conversion of the faculty hotel on the Diamond Head Campus is also plausible. Also realistic is a housing allowance plan which could be tailored to be less costly than bond interest payments. Faculty retention would probably be greater if they had an equity interest rather than just being tenants in a public housing project. We wonder if it would not be wise to find out the exact problem and magnitude of the problem in search of relief. Is university faculty compensation competitive? Is turnover in line with the national average? Will faculty housing so far from campus be a realistic choice or a white elephant? Are there not social impacts of the project?

6. Input from the direct community should be analyzed. The categories should include (but not be limited to) people from adjacent areas, others who would lose the openness and views of a public facilities block, students, parents, teachers, (presently at McKinley and at all the feeder schools), churches located in the area, and community groups and organizations who make use of the same city block and school grounds.

7. Other examples of residential buildings and residences right next to active schools should be studied. It would be difficult to understand objectivity that did not analyze existing occurrences.

8. Full and open communication should occur with the Department of Education. The realistic alternatives of the Department are important to the study of impact. Do growth projections of the HCDA and the DOE correlate? What about the growth in areas beyond Kalaheo?

9. The need for educational space needs to be addressed. The Mauka Area Plan identifies the need for five elementary schools. It suggests that three schools of children will go to private schools without consideration of private school capacity. Intermediate and High School capacity also need to be included.

10. The Mauka Area Plan identifies Pohukaina and KCC as possible future elementary school sites. Is this realistic. What are the consequences?

11. The following social impact must be addressed: building of housing with limited tax dollars to attract UH faculty from the mainland with above average incomes while a large number of residents and public school teachers are in need of housing alternatives

12. What will the effects of pile driving be on the classes and activities at McKinley? What if the driving doesn't occur during the summer? What about the summer classes? How close is Building A to collapse? Will the vibrations cause collapse and take lives?

13. Is the project an allowable and proper use of the site under the Mauka Area Rules and Plans of the HCDA?

We also have still concerns that were noted in our October 27, 1992 letter contained in the response to the Draft EA. We do not feel that the answers noted in the EA were adequate, objective, or logical.

Sincerely,

Paul Kadooka
Paul Kadooka
McKinley PTSA President

Patricia Hammond
Patricia Hammond
Principal, McKinley High School

Tracy Hino
Tracy Hino

Bob Sam
Bob Sam

Kerwin Kiala
Kerwin Kiala

Enilei Alton
Enilei Alton

Pranav G. Chinn
Pranav G. Chinn

Garthi Helel
Garthi Helel

cc: Office of Environmental Quality Control
Aun. Mr. Binan J. Choy
Hawaii Community Development Authority
Aun. Mr. Clifton Goo
Wilson Okamoto & Associates, Inc.
Aun. Mr. Earl Nishikawa



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKA'AKO
Kauai's Heritage Center

John D. Walker
Director

Gary Caulfield
Assistant Director

Michael N. Sullivan
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Mr. Paul Kadooka, et al.
MHS PTSA President
c/o McKinley High School
1039 South King Street
Honolulu, Hawaii 96814

Dear Mr. Kadooka, et al:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-J-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EISPN. We offer the following responses in the respective order of your comments and questions:

1. The State EIS Law (Chapter 143, HRS) does not require that a site be assessed with respect to every conceivable use that could have a public benefit. The alternative of using the site for an elementary school was discussed in the environmental assessment because such a use was mentioned as a possibility in the HCDA's Hauka Area Plan.
 2. Building 857 has already been made available to the school to temporarily house functions displaced from the McKinley High School administration building. Should the project proceed, we would expect that this arrangement would continue while the administration building is being renovated. HCDA is also assisting the school and the DOE in accommodating other functions which may eventually need to be relocated from the building.
 3. If the Hale Kewalo project is not built, the property, including Building 857, will revert to the University of Hawaii.
- The Hale Kewalo development is proposed as a mixed-use development which will address affordable housing and education, as well as recreation needs.

Mr. Paul Kadooka, et al.
Page Two
March 29, 1993

Again, we stress that the EIS is not intended to assess every conceivable use of the site.

4. Land costs are the limiting factor in selecting faculty housing sites. Currently, the University has only two sites available for housing, one at Manoa Valley near Huelani School and the other at Hale Kewalo. Meanwhile, housing for the general public was added to address a critical community need. The University intends to develop faculty housing at the site even if the general rental housing component is excluded. The faculty housing at Hale Kewalo is intended to serve all University of Hawaii campuses on Oahu and is centrally located in that regard. The only long-term plan for additional faculty housing is at Kapolei.
 5. The report prepared by KPMG Peat Marwick entitled UH Faculty Housing Assistance Master Plan (1991) examined the needs for faculty housing and a range of alternatives to address those needs. The Hale Kewalo project and the planned project in Manoa Valley implement the report's recommendations.
 6. The social impact assessment prepared for and incorporated in the Draft EIS for the Hale Kewalo project examines the range of community views that have been expressed regarding the proposed project.
 7. The social impact assessment examines examples of residential development located near schools.
 8. We are not aware of any communication problem with the DOE. While the agencies with interest in the Hale Kewalo project (i.e. DOE, UH, HFDC and HCDA) may hold differing views on selected aspects of the project, the lines of communication between the various agencies has been and continues to be positive and open.
- The growth projections of the HCDA and the DOE pertaining to the Kakaako District are generally consistent. As indicated in earlier correspondence with you on this matter, the HCDA has been working closely with the DOE since the mid-1980s to coordinate projections on student demand. These

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Bureau of Land Management
Washington, D.C. 20250
1993-03-29

month construction schedule. Although every effort will be made to coordinate the noisier phases of construction during periods when school is not in session, this may not be entirely possible. Thus, construction noise could have an adverse impact on classroom functions. Mitigative measures, such as the provision of air-conditioning for classrooms so that windows can be closed to reduce noise, could be implemented as deemed necessary.

Since the construction contractors would be liable for any damage caused by the pile driving and because historic structures are in the vicinity, experts were consulted to ascertain the possibility of damage to those structures during pile-driving. The experts concluded that the potential for damage to the historic structures is extremely low. Their primary concern centered on the caretaker's cottage which is not a historic building but is a fairly old wooden structure adjacent to the project site. Nevertheless, seismographic monitoring has been recommended to address the slim possibility that damage could be incurred. The threshold value recommended is ten times lower than the maximum for which no structural damage would result. Monitoring would be done during test pile driving to determine the appropriate pile, pile driver and methods, such as pre-drilling, to be used for preventing damage to structures.

13. The proposed Hale Kewalo project complies with all Hauka Area Rules and Plans of the HCDA.
14. Without specific elaboration of your concerns regarding our previous responses we cannot, unfortunately, provide any further clarification on the matter. We do hope, however, that we have adequately responded to your latest comments.

projections change over time as more reliable empirical data becomes available. Hence, HCDA's overall growth projections are periodically adjusted to reflect the actual rate and pace of development in the District in the same manner that DOE's student/housing ratios are modified over time based on actual counts from completed projects in the area. Because these changes require constant recalculation of each agency's respective data base, periodic discrepancies will inevitably occur.

With regard to your concern regarding uncertainties related to demand attributable to out-of-District growth or decline, the recent steps taken by the DOE toward the preparation of an Action Plan for Honolulu District school facilities should help clarify this matter. We are fully supportive of, and look forward to working with, the DOE in this effort.

9. This is a broader concern that the above-mentioned strategic planning effort is aimed at addressing.

10. In earlier years, the Pohukaina and KCC properties were not viewed favorably by the DOE as potential elementary school sites. Size and, in the case of the latter, proximity to the high school, were viewed as constraining factors.


11. The faculty living at Hale Kewalo must meet the same income qualifications for affordable housing as the non-faculty residents. Moreover, pursuant to University policy, they will be expected to find alternative housing arrangements within a three-year period. The units at Hale Kewalo are designed to accommodate junior grade faculty, entry level instructors and assistant professors who do not command "above-average incomes." The impact of their presence in the community is addressed in the social impact assessment.

12. Noise will be generated during the construction of the proposed project, and will be particularly noticeable during pile-driving. Pile driving will last approximately 35 days of the anticipated 17-

Mr. Paul Kadooka, et al.
Page Five
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomy
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



McKinley Student Council

1029 SOUTH KING STREET • HONOLULU, HAWAII 96814 • TELEPHONE 336-1061

February 17, 1973

I urge you to please take our concerns into consideration in the Environmental Impact Statement. After all, the land is a part of our environment.

Sincerely,

Vanessa Lee
1st Vice President
McKinley Student Council

Mr. Mike McElroy,
Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. McElroy:

As 1st Vice President of the student body of McKinley High School, it is my duty, to inform you of the concerns raised by student body. During a Student Congress meeting, a vote was taken on the Hale Kewalo issue. The vote was unanimous against the proposed Hale Kewalo project if it is on the former site of the Pensacola campus of HCC.

We have decided that we would like to be consulted during the process of the Environmental Impact Statement and have also come up with several issues that we would like to be included in the EIS.

First of all, we feel that an immediate effect from Hale Kewalo if it is put into action would be from construction. Will the noise generated from the construction cause a hindrance to learning? Where do you intend to park all of the construction vehicles and vehicles delivering supplies to the construction site? Will traffic congestion be increased on Pensacola Street due to construction vehicles also? Can construction also affect utilities belonging to McKinley High School, such as water and electrical power? At the completion of the Hale Kewalo project, other concerns will also be raised. How will McKinley's current happen, student atmosphere be disrupted? We presently boast to be the only high school in the state to field ever, varsity boys' and girls' sport - will complaints from tenants cause an end to this? We also have an annual carnival and the State Farm Fair is also held on McKinley's campus. Will there be an end to that also? We know that at Iolani School, complaints from neighbors have forced the school to restrict many of its student activities. Although we have heard that the contract for the tenants will include an agreement on not complaining about possible noise, what will be done to enforce this rule? How can this proposed site for the Hale Kewalo project be fair to both the school and the tenants?





STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKAWA
HAWAIIAN LAND AND NATURAL RESOURCES

John D. Walker
Director

Gary Caulfield
Assistant Director

Michael N. Scammon
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Vanessa Lee
MHS SC 1st Vice President
c/o McKinley High School
1039 South King Street
Honolulu, Hawaii 96814

Dear Ms. Lee:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 19, 1993 commenting on the subject EISPN. We appreciate the involvement of the McKinley High School Student Council in the environmental impact review process, and acknowledge your opposition to the project. You will be included in our list of parties to be consulted on the Draft EIS. All of the questions and concerns raised in your letter will also be addressed in the Draft EIS.

We offer the following responses in the respective order of your comments and questions:

1. Noise will be generated during the construction of the proposed project, and will be particularly noticeable during pile-driving. Pile driving will last approximately 35 days of the anticipated 17-month construction schedule. Although every effort will be made to coordinate the noisier phases of construction during periods when school is not in session, this may not be entirely possible. Thus, construction noise could have an adverse impact on classroom functions. Mitigative measures, such as the provision of air-conditioning for classrooms so that windows can be closed to reduce noise, could be implemented as deemed necessary.

2. To the extent possible, construction-related vehicles, including commuting construction worker's vehicles will be parked on the project site during construction. Occasional restriction of on-street

Ms. Vanessa Lee
Page Two
March 29, 1993

parking may be required to accommodate delivery of construction materials.

3. Slow-moving construction vehicles and large vehicles delivering construction materials can impede traffic flow. Therefore, their movements will be coordinated to avoid peak traffic periods. While commuting construction workers may add to peak hour vehicular traffic, this increase in traffic will be offset by the reduction in commuting traffic when the existing uses on the project site are relocated.

4. Any interruption of utility services at the high school will probably go unnoticed because they will occur during low demand hours, i.e., at night.


5. Medium and high rise residential development in the vicinity of McKinley High School will inevitably occur as the Kakaako area undergoes redevelopment. This will increase the likelihood, in the long-run, for potential conflicts with the school. Further, even if the proposed Hale Kewalo project is not built, the University of Hawaii still plans to build faculty housing on the site, and private developers will be constructing a large residential high rise structure across Pensacola Street from the Hale Kewalo site.

While the proposed provision in the Hale Kewalo rental agreements apprising tenants that they may be subjected to noise impacts from the high school may not entirely prevent tenants from complaining, it should provide the school with an advantage in addressing any complaint. It should also be noted that the State Department of Health rules were changed in 1989 such that complaints against schools are not valid while normal school activities are underway between 7 A.M. and 10 P.M. While the carnival and fairs which are held at the McKinley athletic field may extend past the nighttime limit, these are limited, once-a-year events and, therefore, more tolerable, particularly if the tenants are apprised of their occurrence in their rental agreements.

Ms. Vanessa Lee
Page Three
March 29, 1993

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



CHARLES T. EDWARDS
Superintendent



STATE OF HAWAII
DEPARTMENT
OF
EDUCATION

McKinley High School

1039 SOUTH KING STREET • HONOLULU, HAWAII 96814 • TELEPHONE 536-1001

February 18, 1993

Hawaii Community Development Authority (HCDA)
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
Attention: Harold Edwards

Dear Mr. Edwards:

I am writing this letter on behalf of the McKinley High School science department to inform you of a deep concern related to the Hale Kewalo Rental Housing Mixed-Use Development.

The noise abatement system installed in the science building during the summer of 1984 has posed severe health hazards to students and teachers who use the building. Contact dermatitis, aggravated allergies, sinus congestion, and watery eyes are among the complaints. Indeed, the excessive dust within the classrooms is an ongoing problem. Construction of the Hale Kewalo Rental Housing Project will aggravate an already intolerable situation.

I strongly urge that an Environmental Impact Statement be completed before any construction is undertaken.

Sincerely,

Barbara Rogers

Barbara Rogers
Chair, Science Dept.

C.C. HFDC
Wilson Okamoto and Associates, Inc.



John D. Walker
Governor

Gary Caudill
Commissioner

Michael N. Squire
Deputy Commissioner

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 536-2570
Facsimile
(808) 536-2411

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Barbara Rogers
Chair, MHS Science Department
c/o McKinley High School
1039 South King Street
Honolulu, Hawaii 96814

Dear Ms. Rogers:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 18, 1993 commenting on the subject EISPN.

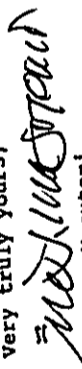
The problem in the Science Building is unrelated to ambient environmental conditions which is the baseline against which impacts of the project are assessed. If an unhealthy condition exists, it should be corrected. The EIS for the Hale Kewalo project should not be relied upon to assess that unique condition.

Dust generated during construction at the project site is subject to State air pollution control regulations. Basically, these regulations require that there be no visible fugitive dust at the property line. The construction contractor is subject to penalties as high as \$20,000 per violation. While fugitive dust will inevitably be generated by site preparation work, particularly during dry and windy conditions, this impact can be mitigated by watering active work areas and covering open bodied trucks. It should also be noted that the Science Building lies upwind of the project site during prevailing tradewind conditions.

Ms. Barbara Rogers
Page TWO
March 29, 1993

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA



joint use as proposed, this situation would only be exacerbated.

Because I am frequently on campus during non-school hours such as evenings and weekends, I see that the parking at McKinley during activities both by the school and the community have stretched the parking on campus to the limits where people park all over the grass. The removal of any on-street parking as suggested in the plans for Hale Kewalo would only further crowd the parking at McKinley for activities and for the tenants of the project and their guests. I realize you have a parking facility, but I also live in a condominium with a massive parking garage and fairly good on-street parking and there still is a tremendous parking shortage there. The shortage already exists around the McKinley campus. Please consider in depth what this project would further do to our parking situation.

I hope that these issues will be addressed fully and completely through the environmental impact study. I will appreciate references and documentation when the study is completed.

Sincerely,

Shirley S. Skaas

Shirley S. Skaas
Teacher/Coach/ Historian
McKinley High School

500 University Avenue, #211, Honolulu, Hawaii 96826

February 20, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii, 96813

Dear Mr. McElroy:

First, let me say that I am grateful that a complete Environmental Impact Statement is being prepared on the Hale Kewalo Project. As you know from my previous communications to HFDC, I thought it necessary.

As one of the historians of the McKinley High School, I continue to be concerned about the potential adverse impact on the aging administration building. Since it has recently shown that it is structurally in need of immediate renovation, I believe that the adverse effect of the Hale Kewalo Project would be significant.

Although, statements have been made that the towers will not have a visual effect on the McKinley campus and its historic nature, I cannot concur in that. I have recently seen a depiction of the towers to scale from the Kapiolani side and the sheer size alone of the buildings, dwarfs the entire campus.

As a McKinley coach, I continue to be concerned about the tenants of the proposed buildings and their complaints about noise and their desire to use the athletic facilities which are already used to capacity.

With regard to the noise issue, I realize that you state the tenants will have to sign some form of disclaimer. However, who will produce those disclaimers when the police are called to the campus because of the noise of typical high school activities? The situation around Iolani School was similar for units built adjacent to the school. However, the complaints were still made and students had to adjust their programs when they were led to believe they would not have to do so.

As for the joint use of the facilities, teams currently have to shift and practice in makeshift areas. Who will be an on-site manager if their is joint use to assure that students have the first priority at all times? Who pays for this person? With regard to repair of a facility jointly used, even now, repair and maintenance takes forever due to lack of funding and time open for such needs. With further



DEPARTMENT OF PLANNING AND ECONOMIC DEVELOPMENT



KAKAOKO
KAKAOKO COMMUNITY DEVELOPMENT CENTER

John D. Waiver
Executive Director

Gary Caulfield
Assistant Director

Mahealani Searles
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Galle Sykes
500 University Avenue, #911
Honolulu, Hawaii 96826

Dear Ms. Sykes:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 20, 1993 commenting on the subject EISPN. We offer the following responses in the respective order of your comments:

1. The proposed program to monitor ground vibrations is a safeguard to prevent damage to nearby historic structures during pile driving. A conservative threshold was used, recognizing not only that some of the buildings are historic, but also possibly weakened structurally.
2. In the urban design context, public views from scenic vantage points or highly traveled areas are often targeted for protection. Thus, the view corridors along Pensacola Street and Kapiolani Boulevard have been protected by building setbacks. Also, the front view of the historic McKinley campus from King Street, which has been identified and assessed as an important vista, will not be compromised. While the aesthetic character of specific locations within the McKinley High School campus and from certain off-campus locations looking towards the building may change as a result of the towers, such locations are not identifiable as important scenic vantage points or view corridors.

The view that you discuss is one from within the view corridor rather than one which looks along the view corridor. Depending on your location, the proposed buildings, as any large structure, will

Mahealani Searles
Executive Director
EISPN/20
E-1000
3/29/93

Ms. Galle Sykes
Page Two
March 29, 1993

appear to dominate the view. The important consideration is whether or not significant public views are affected.

3. The social impact assessment to be included in the Draft EIS will address concerns regarding the extent to which complaints by project residents of noise from the high school may affect school activities. It should be noted that medium and high rise residential development in the vicinity of McKinley High School will inevitably occur as the Kakaako area undergoes redevelopment. This will increase the likelihood, in the long-run, for potential conflicts with the school. Further, even if the proposed Hale Kewalo project is not built, the University of Hawaii still plans to build faculty housing on the site, and private developers will be constructing a large residential high rise structure across Pensacola Street from the Hale Kewalo site.

At Hale Kewalo, a provision in the rental agreements will apprise tenants that they may be subjected to noise impacts from the high school. While this may not entirely prevent tenants from complaining, it provides the school with an advantage in addressing those complaints. It should also be noted that the State Department of Health rules were changed in 1989 such that complaints against schools are not valid while normal school activities are underway between 7 A.M. and 10 P.M.

4. We are puzzled by your reference to the joint use of McKinley High School athletic facilities by Hale Kewalo residents. Residents of Hale Kewalo will not have any greater access to such facilities than the general public. Potential use by McKinley High School of the 1.75 acre field to be built in conjunction with the Hale Kewalo facility at the corner of Kapiolani Boulevard and Pensacola Street is, however, being considered as a possibility.

5. The proposed project will exceed existing HCDA requirements for off-street parking. This includes 50 stalls of parking which will be made available

Ms. Gaile Sykes
Page Three
March 29, 1993

for use by the DOE, potentially by McKinley High School. This far exceeds the 13 to 16 spaces of on-street parking that will be lost. It should also be noted that, based on our traffic engineer's informal observations, those who park on Pensacola Street apparently have destinations makai of Kapiolani Boulevard. To assist in addressing parking requirements in the Kakaako District, the HCDA is planning to build a multi-story parking garage at the corner of Pensacola and Waimanu Streets where a 140-stall public parking lot is currently located. Parking demands in the general area will be addressed by the planned expansion of the municipal parking garage at Neal Blaisdell Center where an additional 400-600 stalls will be built.

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

HEDC
Hale Kewalo EISRW
2/22/93, p. 2

1310 Heulu St., Apt. 1002
Honolulu, HI 96822
Mon., Feb. 22, 1993

(3) Public Tower.

To: Housing Finance and Development Corporation
Attention: Mr. Mike McElroy
677 Queen St., Suite 300
Honolulu, HI 96813

From: Amy Kimura *Amy Kimura*

Subject: Halekewalo Rental/Housing Mixed-Use Development
EIS Preparation Notice Consultation Period Comments

The general public tower was originally said to provide "moderate income" apartments. It is now described as providing "affordable" housing. (a) How much rent is to be charged for each type of apartment (studios, 1 BR, & 2 BR) and (b) how large will each type be? (Sometimes I have observed that "affordable" rents are not much lower than market rents. Taxpayer dollars, Federal or State, should not be used to subsidize market level rents, thereby competing unfairly with private developers and wasting tax money.)

(4) Parking.

(a) With approximately 530 apartments, how much space will be included for loading/unloading areas for each tower? Will this be sufficient? (b) Where will visitors, including the handicapped, park? How many visitor stalls including those for the handicapped, will be provided for each tower, if any? (c) With the public tower planned with 1 BR and 2 BR apartments only, how many stalls are allotted each apartment? In Honolulu my observation (I have lived in a high-rise, high-density neighborhood for over 20 years) has been that one stall per apartment is totally inadequate unless it is a building for senior and disabled adults only. Moreover, with 60% 2 BR units (161 of 270 apartments as of 1/93 drawings) in the public tower, one should expect at least 1 1/2 cars per 2 BR unit. (d) Are enough stalls planned for the two towers? Where will the extra cars park if Nauau Towers and other high density apartments planned across Pensacola Street and Kapi'olani Boulevard are built and also have extra cars looking for on-street parking?

(5) Traffic.

The Hale Kewalo Traffic Study done by the consultant for the Draft Environmental Assessment claims there will be only 120 cars exiting from the 530 apartments during morning peak hour and 110 entering during the evening peak hour. I find this an absurdly low estimate given the number of cars owned by residents and the fact that nearly all apartments should be occupied by at least one employed person. Even UH faculty who do not have early classes have spouses who will work and/or children who need to be taken (often driven) to school or pre-school.

(6) Additional Population/Household Size.

The number of new residents to be added by this project (900-1040) is based on the average household size (1.70-1.96) of the neighboring area. What is the average number of bedrooms and apartment size in the neighboring area used?

(7) Zoning.

The entire McKinley High School/Neal Blaisdell Center superblock is zoned public use. Why is the zoning across Pensacola Street, a wide thoroughfare of about six lanes, selected as the "adjacent" zoning? I have no objection to high rise towers across the street from McKinley High, on Pensacola or Kapi'olani Boulevard. The two wide streets provide a buffer.

(1) Interim Use.

Very recently it came to my attention that McKinley High School's historic Administration Building ("Building A") is no longer safe for students, faculty, and staff to occupy. The Dept. of Education has moved it up in priority for renovation, and the Board of Education voted last Thursday, February 18, to place the renovation on its list of construction priorities to be approved by the Legislature. During the period Building A must be evacuated and until it is safe and healthy to be used for classes and offices, students, teachers, and staff must be relocated. The simplest, quickest, cheapest, most logical place is the former Pensacola campus of Kapiolani Community College, i.e., the Hale Kewalo site. It has several buildings and portables, all of which could easily and relatively quickly be converted into interim classrooms and offices.

(2) Recruiting Top-Notch UH Faculty.

The EISRW states the project "addresses UH's need to recruit and retain top-notch faculty by designating one tower for housing for UH faculty." According to the UH Faculty Housing Assistance Master Plan (January 1991, pp. 23-24), the rental housing program should include one-, two-, and three-bedroom apartments including day care facilities. The target group is new appointees of 1-3 years until their "needs and incomes permit them to buy condominiums or single-family homes." (p. 23) The consultant also recommends that the mix should emphasize 2-bedroom and 3-bedroom units, as these are harder to obtain in the private local rental market. KPMG Peat Marwick consultants suggests a hypothetical plan of 80 1-bedrooms with 700 net square feet, 110 2-bedrooms with 1,000 net square feet, and 60 3-bedrooms with 1,300 net square feet for a total of about 250 apartments.

How close to these recommendations is the proposed UH Tower? (a) Day care facilities are not included. (b) All the units will be much smaller than recommended, according to what I have seen, all "preliminary." (c) About 30% will be studios (called efficiencies elsewhere), not mentioned by the consultants, and 1/3 to less than 1/2 will be 2 BR, 3 BR, or 1 BR plus study (KPMG recommends approximately 2/3). (d) Will these much smaller apartments be able to attract the kind of top-notch faculty UH is targeting, "rainmakers" who are used to much larger apartments?

HIFDC
Hale Kewalo EIS/SPN
2/22/93, p. 3

(8) Other schools with adjacent high-rise, high-density apartments.

Other schools with surrounding high-density, high-rise apartments have had to curtail some of their healthy, wholesome school activities (marching band practice, athletic practices and events, rallies, carnivals, etc.) Is it sufficient to state that all tenants will be "appraised that they may be exposed to potential noise from the school in their rental agreements"? If they find the noise worse than they anticipated, what is to stop them from complaining to police, the Dept. of Health, or the school? Iolani School and Moanalua High School have adjacent high rise apartments. Have they been contacted by HCDA for their comments?

(9) Other community groups.

Have other organizations/groups been contacted? For example, (a) Historic Hawaii Foundation for its [1] opinion on this project and its effect on historic McKinley High and [2] the effectiveness of the pre-drilling to be used to reduce the amount of force required to drive the piles and [3] seismicographic monitoring during construction? (b) Office of Hawaiian Affairs, Chair Clayton Hee; Association of Hawaiian Civic Clubs, Chair H. Bruce Keppeler; and Ka Lahui Hawai'i, Governor Millilani Trask; for their comments on possible pre-contact bones and artifacts and the method recommended by DHR's State Historic Sites Division regarding them. (c) neighborhood board(s) regarding their reaction to this project?

(10) Educational Land.

(a) How sound is public policy that removes land from educational use, both present and future, for housing to be used exclusively by the tenants of the 530 apartments? I do not refer to Building 857 or to the ETO facility, both of which are to serve educational uses.

(b) How ethical is it to take land from McKinley for a legitimate educational use and need (the vocational school formerly under DOE jurisdiction which was transferred to UH's jurisdiction) and then to use much of that land in two housing towers when there is a need for educational use of that land in the near future?

(c) How wise is it economically to use educational land for housing and 5 to 10 years later have to condemn and buy land for schools? Housing can be located on many parcels of land; schools cannot be so easily located.

cc: HCDA, Attention: Mr. Harold Edwards
Wilson Okamoto and Associates, Inc., Attention: Mr. Earl Matsukawa
OBCC, Attention: Mr. Brian J. J. Choy



LAND AND NATURAL RESOURCES
DEPARTMENT



John D. Walker
Director

Gary Caulfield
Assistant Director

Michael N. Surfleet
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Amy Kimura
1310 Heulu Street, Apt. 1002
Honolulu, Hawaii 96822

Dear Ms. Kimura:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EIS/SPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EIS/SPN. We offer the following responses in the respective order of your comments:

1. Building 857 has already been made available to the school to temporarily house functions requiring immediate relocation. HCDA is also offering additional support in accommodating other functions which may eventually need to be relocated from the building.
2. The report prepared by KPMG Peat Marwick entitled UH Faculty Housing Assistance Master Plan (1991) offers a range of recommendations for accommodating faculty housing needs. The UH is utilizing the plan which the Hale Kewalo project, together with another planned faculty housing in Manoa Valley, will implement. Basically, the smaller units (including studios and one-bedroom units), will be more heavily represented at the Hale Kewalo project while the larger two- and three-bedroom units will be located at the Manoa site. With respect to your comments regarding the Hale Kewalo project, we offer the following point-by-point responses:

- a. Providing day care facilities at the Hale Kewalo facility was not found to be cost-effective. Since the Hale Kewalo units are smaller, it is anticipated that there will be fewer children per unit at the Hale Kewalo project. In addition, there is an existing

47 Ala Moana Blvd. and
Suite 1101
Honolulu, Hawaii
96813
Telephone
(808) 527-2000
Fax number
(808) 527-2013

day-care facility nearby at HCDA's Kamakee Vista project located at Kawahao and Kamakee Streets.

- b. Although larger units would have been desirable, the realities of construction costs and land availability in Hawaii dictate what is feasible for affordable units.
 - c. As discussed above, the larger units will be located at Manoa Valley near Noelani Elementary School while the smaller units would be located in Hale Kewalo. The combined mix is closer to the report's recommendation.
 - d. The "attraction" offered by Hale Kewalo to new faculty members is that of making affordable housing available in a tight housing market. While larger units might be desirable, the units being provided in the project are in line with Hawaii standards.
3. The rent for the studio unit will be \$600, for the one-bedroom unit it will be \$750, and for the two-bedroom unit it will be \$1,000. The approximate average floor areas for these units are as follows: studio - 500 square feet; one-bedroom - 660 square feet; and two-bedroom - 800 square feet.
 4. The Hale Kewalo project will provide a total of 716 parking spaces within the development. This exceeds the HCDA's requirement of 662 spaces for the various uses by 54 spaces. All requirements for visitor and handicapped parking will be met. Parking demands in the general area will also be addressed by the planned expansion of the municipal parking garage at Neal Blaisdell Center where an additional 400-600 stalls will be built. Further, the HCDA is planning to build a multi-story parking garage at the corner of Pensacola and Waimanu Streets, where a 140-stall at-grade public parking lot is currently located.
 5. The vehicle trip generation rate for the residential towers is that provided by the Institute of Transportation Engineers Trip

Generation Manual. Our traffic consultant indicates that this trip generation rate is probably high for faculty members whose class schedules may allow them to avoid the morning and afternoon peak hour.

6. The social impact assessment prepared for the EIS projects the number of new residents based on a household size ranging from 1.75 to 2.2 persons. The low figure is derived from the assessment's Study Area 1990 average household size while the high end is the figure used by the HCDA for estimating population in the Kakaako district. U.S. Census "persons per bedroom" data are used to describe crowding as descriptor of housing characteristics but there is no census information on apartment size.
 7. The HCDA Mauka Area Rules state that "(w)ithin areas designated... "public use areas" (PUBLIC), the provisions applicable to the adjacent land use zone shall apply." (Section 15-22-40). In the case of the Hale Kewalo project, which is adjacent to both the Mixed-Use Commercial (MUZ-C) and Mixed-Use Residential (MUZ-R) zones, the more restrictive MUZ-R provisions were applied.
 8. Medium and high rise residential development in the vicinity of McKinley High School will inevitably occur as the Kakaako area undergoes redevelopment. This will increase the likelihood, in the long-run, for potential conflicts with the school. Further, even if the proposed Hale Kewalo project is not built, the University of Hawaii still plans to build faculty housing on the site, and private developers will be constructing a large residential high rise structure across Pensacola Street from the Hale Kewalo site.
- At Hale Kewalo, a provision in the rental agreements will apprise tenants that they may be subjected to noise impacts from the high school. While this may not entirely prevent tenants from complaining, it provides the school with an advantage in addressing those complaints. It should also be noted that the State Department of

Ms. Amy Kimura
Page Four
March 29, 1993

Health rules were changed in 1989 such that complaints against schools are not valid while normal school activities are underway between 7 A.M. and 10 P.M.

9. The proposed project has been reviewed by the State Historic Preservation Division which is the agency responsible for reviewing the potential impacts of State projects on historic properties, especially those listed on the State Register of Historic Places, according to Chapter 6E, Hawaii Revised Statutes (HRS). The previous Environmental Assessment and the Environmental Impact Statement presently being prepared for the Hale Kewalo project will comply with all requirements for public notification and review pursuant to Chapter 343, HRS. Thus, the parties you mention have been given the opportunity to participate in the EIS process. Neighborhoods Boards 10 and 11 have contacted us and will participate in reviewing the Draft EIS.

10. The EIS discusses the relationship of the proposed project to various plans and policies. This project addresses multiple community needs, including affordable housing, education, higher education and recreation. Maximizing the use of scarce public lands for the broadest public good is indeed sound public policy.

The project does not take land from McKinley High School. Rather, the school would potentially gain approximately 40,000 square feet of additional classroom space with the conveyance of Building 857 to the DOE. Meanwhile, longer term options for further on-campus expansion of the school as prescribed in the McKinley High School Campus Development Report (DAGS, 1981), would still be available in the event that future school enrollment significantly exceeds DOE's current projections. The latter projections, which take into account the potential 20-year build-out of the Kakaako District, fall well within the design capacity of the school as established in the DAGS report.

Ms. Amy Kimura
Page Five
March 29, 1993

We hope that we have adequately responded to your comments. Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



DEPARTMENT OF EDUCATION
STATE OF HAWAII



John D. Walker
Director

Gary Caulfield
Assistant Director

Michael N. Scarfone
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Erlinda G. Gamata
1201 Kokea Street
Honolulu, Hawaii 96817

Dear Ms. Gamata:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 20, 1993, appraising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.

Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 would be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.

Dr. Ali Akbar Shah
Superintendent
Honolulu, Hawaii
1993
1993
1993

2-20-93

Re: The Director, Housing Finance Development Corp

I am a student of McKinley High School and want you guys to save our Summer KCC program site for education because we need it for our infant, toddlers for day care center. I don't want our former KCC building to be destroyed and built new housing for us McKinley students who are in this program called Young Parents Planning need a day care center because we don't have enough money to bring our infants here. There were also a class here before we came and transferred to room 857. The classroom at KCC Pensacola was also bigger and larger than our classroom now. If we want to need something for emergencies we can be closer to McKinley High School and its going to be a lot easier for us, we don't have to walk to park. The former KCC Pensacola site may be ugly but use it can give us a great deal of help and use it for our education, we need education more than anything and we need program more for - the young parents planning - ~~more~~ lives for - the young parents use it and help!

This program is a very useful and helpful program that teachers really need. That's why we don't want you people to build new buildings education and day care are the most important things we need at the Summer KCC Pensacola.

John D. Walker
Director

1201 Kokea St
Honolulu, Hawaii 96817

Ms. Erlinda G. Gamata
Page TWO
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

March 29, 1993

Ms. Chantal Yamashita
1234 Kamaile Street, #1
Honolulu, Hawaii 96814

Dear Ms. Yamashita:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPH)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 21, 1993, apprising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.

Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 would be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKA'IKO
Honolulu, Hawaii

John D. Walker
Director

Cory Caulfield
Assistant Director

Michael N. Scully
Assistant Director

67 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 551-2070
Facsimile
(808) 551-2013

February 21, 1993

To The Director Housing Finance Development Corp,
Please save McKinley High School.
Please don't build housing on the former
KCC-Pendola site for education. Before
we had a class in one of the portables
and it was convenient and there was
a lot more space than our classroom in
Building 857. The KCC portables will
also help us for our childcare nursery
because it is close to school in case of an
emergency. Right now our nursery is about
half to four blocks away. The portables
will also help because some of the young
parents want their pregnancy to be
confidential. The KCC-Pendola site is
slightly off McKinley and so it will be
confidential. Please put serious thought
into your decision. Please think about
us.

Thank You,
Chantal Yamashita

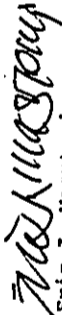
1234 Kamaile St. #1
Honolulu, HI. 96814



Ms. Chantal Yamashita
Page Two
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HOA

2/17/93
TO THE DIRECTOR, HOUSING FINANCE DEVELOPMENT CORP.

PLEASE SAVE OUR FORMER KCC PENSACOLA SITE. LAST YEAR WE WERE IN THE PORTABLES BUT WE HAD TO MOVE. THEY WERE GOING TO DEMOLISH THE BUILDINGS BECAUSE OF THE LACK OF ROOM SPACE ON THE MCKINLEY SCHOOL CAMPUS WE WOULD GREATLY BENEFIT FROM THE USE OF THIS PROPERTY FOR OUR YOUNG PARENTS PROGRAM.

AT THE PRESENT TIME OUR INFANT TODDLER PROGRAM IS LOCATED 3 BLOCKS AWAY FROM MCKINLEY SCHOOL CAMPUS. IT WOULD BE MORE CONVENIENT TO MOVE THE DAY CARE CLOSER TO THE CAMPUS. WHEN MY CHILD IS SICK I HAVE TO RUN 3 BLOCKS AND CARE FOR MY CHILD AND IF IM ABLE RUN BACK TO CLASS WHICH INTERFERES WITH MY LEARNING. IF THE NURSERY WAS CLOSER TO THE CLASSROOM I WOULD CONSIDER VISITING MY CHILD.

Sincerely,
Joy Isakama

94-303 Lupua Pl.
Miliiani Town, HI
96789



John D. Walker
Executive Director

Cary Caulfield
Assistant Director

Michael N. Sautone
Assistant Director

677 Ala Moana Blvd., 2nd Fl.
Suite 4011
Honolulu, Hawaii
96813
Telephone: (808) 527-2001
Facsimile: (808) 527-2111
TTY: (808) 527-2111

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Joy Ishikawa
94-303 Lupua Place
Miliiani, Hawaii 96789

Dear Ms. Ishikawa:

Re: Hale Kewalo Rental Housing Mixed-Use Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 17, 1993, apprising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.


Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 would be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.

Ms. Joy Ishikawa
Page Two
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, NOA

2-19-93

To the Director, Housing Finance, Development Corp.

Right now I am a student of Mt. St. Joseph High School and I really feel you should give KCC-Bonarda property. Right now I am attending a class called the young parents program (YPP), which is using the facility on Wain 205 this year. (The YPP used the facilities at the former KCC campus last year, but in September we discovered we had to vacate the property immediately.)

Having the class really helps alot for having the class near home for the YPP. We need more classroom space and a place for the infant/toddler program to be near the KCC campus. Having the toddler program near the KCC would be very good for emergency purposes. As a mother of a 2 month old I feel I would feel better if the class were located closer to the campus. Well, especially since its there kids away right now.

I think its really helps alot for those pregnant teens who attend the class and don't kind to be seen on school campus. This program really helps out those who are teen parents. Right now there are becoming teen parents. Right now there is no place or campus to have this program. In the program doesn't get the Bonarda property, the teens wouldn't get the help they need. Plus the program puts a lot of support for the teens. If there was a program, who would the teens turn to if they don't get the support from their

families. The program also helps teens cope with their life changes of being a teen parent.

Sincerely,
Ava Cisneros

647 KUNIAHOAI LN. #512
HONOLULU, HAWAII 96817



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKAIAKO
A Division of the Department of Land and Natural Resources

John D. Walker
Director

City Council
Honolulu

Michael S. Sullivan
Assistant Director

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Avis Cayetano
647 Kunawai Lane, #512
Honolulu, Hawaii 96817

Dear Ms. Cayetano:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISP)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 19, 1993, apprising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.

Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 should be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.

City of Honolulu
Department of Land and Natural Resources
Honolulu, Hawaii
1993
Telephone
(808) 535-2070
Fax
(808) 535-2071

Ms. Avis Cayetano
Page Two
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HOA

March 29, 1993

Ms. Renee Dilayo
146-1 Malunui Avenue
Kailua, Hawaii 96734

Dear Ms. Dilayo:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPW)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 12, 1993, apprising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.

Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 would be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKAIAO
Hawaii's Premier Rental Program

John D. Walker
Director

Carly Culik
Assistant Director

Michael N. Sullivan
Assistant Director

67 Ala Moana Boulevard
Suite 801
Honolulu, Hawaii
96813
Telephone
(808) 947-3279
Facsimile
(808) 947-3411

Feb 12, 1993

To the Director Housing Finance Development Corp,

Please save our Koo Pensacola Site, that land can have great use for McKinley High School. I am a student at McKinley and I am in a Program for Young Parents, our class is located in Bldg 857. We can use those portables for our infant-toddler program which is now located at a church off-campus, this portable are much closer for us to go to their the nursery now, it is also much more convenient for us to. Specially when our children are sick and it were still nursing our babies.

Thank you.
Renee Dilayo
146-1 Malunui Ave
Kailua, HI
96734

Ms. Renee Dilayo
Page Two
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



DEPARTMENT OF LAND AND NATURAL RESOURCES



KAKAWAO
Kauai, Hawaii

John D. Wahne
Director

Gary Caulfield
Manager

Michael N. Scudone
Assistant Manager

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Ms. Corrina Cheong
1101 Liliha Street, #102
Honolulu, Hawaii 96817

Dear Ms. Cheong:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 16, 1993, apprising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.

Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 would be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.

To the Director Housing, Economic Development Corp.,
I have seen the former KCC - Peninsula
site for education. I am attending the
Young Parents Program. We are to be
in the postulated. We don't want to
be an annex because we want to
keep it confidential. One day there
centers in these blocks away from
McKinley High School. We need a
day care center nearby because
we don't afford to wait a month
to find the center to catch the
child. I have a few years old
daughters. This would be great if
the day care center was open by
because in the future when there
are more payment for them
would be helpful for them
also in the postulated and look
more from now because they were
going to build it down.

Thank you,

Corrina Cheong
1101 Liliha St #102
Honolulu, Hawaii
96817

February 16, 1993

67 Ala Moana Blvd, 2nd
Floor, Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 537-2000
Facsimile
(808) 536-2011

Ms. Corrina Cheong
Page Two
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



DEPARTMENT OF LAND AND NATURAL RESOURCES



John D. Walker
Gary C. Guilford
Michael N. Scudiere

Ref. No.: PL GEN 1.15b.2

March 29, 1993

Mr. Danregis Palakiko Hinch
1104 Liliha Street, 17 K
Honolulu, Hawaii 96817

Dear Mr. Hinch:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISP)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993, apprising us of your concerns regarding the potential impact of the Hale Kewalo project on McKinley High School's Young Parents Program. Your thoughts have also been echoed by other students enrolled in this program.

Please be assured that unless the school and/or the DOE decide to displace the Young Parents Program from its current location in Building 857, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 857 would be turned over to the DOE, potentially providing an additional 40,000 square feet of space not currently available for use by McKinley High School. Whether or not portions of this additional space should also be made available for a child-care facility is a decision that rests solely with the DOE.

The above notwithstanding, should the Hale Kewalo project not proceed, use of Building 857 and the entire site would revert to the University of Hawaii, and alternate on- or off-campus space may need to be found to accommodate the Young Parents Program.

U.S. Marine Band and
Honolulu, Hawaii
Telephone
Honolulu, Hawaii

2/22/93

To the Director, Housing Finance
Development Corp.

We need this KCC-Pensacolo property because we don't have any room in McKinley High school and if they break down the portables we won't have any where to go. Then our parenting class will have to wait till we find a new place to go and by the time we to find some missed out on all the things we have come to learn. Because the KCC-property is very close to McKinley H.S, we can go there for our GRADS class and return to the McKinley campus for our other classes. It will also be a convenient location for our McKinley's Tiger TOTS Program. We will then be able to attend and care for our children a lot easier in cases of emergencies,

Address: 1104 K Liliha St. Thank you,
96817 Bldg. 17 Danregis
Palakiko-
Hinch

P.S I have a 16 months old son.

Mr. Danregis Palakiko Hinch
Page Two
March 29, 1993

Your letter, together with this response, will be included in the Draft EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA

DRAFT EIS CONSULTATION



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
FT. SHAFER, HAWAII 96813-5446

SENT TO
ATTENTION OF

April 19, 1993

Planning Division


Mr. Eric J. Masutomi
Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the Hale Kewalo Rental Housing Mixed-Use Development (TRK 2-3-9: 1). The following comments are provided pursuant to Corps of Engineers authorities to disseminate flood hazard information under the Flood Control Act of 1960 and to issue Department of the Army (DA) permits under the Clean Water Act; the Rivers and Harbors Act of 1899; and the Marine Protection, Research and Sanctuaries Act.

- a. The project does not include work within waters of the U.S.; therefore, a DA permit will not be required.
- b. The flood hazard information presented on page II-2, paragraph 4 of the report is correct.

Sincerely,


Kisuik Cheung, P. E.
Director of Engineering

Copies Furnished:

Mr. Al Ahana
Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Mr. Brian J. J. Choy
Office of Environmental Quality Control
State of Hawaii
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Mr. Earl Matsukawa
Wilson Okamoto and Associates, Inc.
P.O. Box 3530
Honolulu, Hawaii 96811

RECEIVED

APR 21 1993

WILSON OKAMOTO & ASSOCIATES, INC.



HAWAIIAN ISLANDS
DEVELOPMENT AUTHORITY



KAKAIAKO
1001 Kamehameha Avenue, Suite 100
Honolulu, Hawaii 96813

John D. Wallace
Chairman

Gary Caulfield
Chairman

Michael N. Scarfone
General Manager

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 521-2000
Facsimile
(808) 521-2113

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. Kisuk Cheung
Director of Engineering
U.S. Army Corps of Engineers
Pacific Ocean Division
Building 230
Fort Shafter, HI 96858-5440

Dear Mr. Cheung:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 19, 1993
commenting on the subject Draft EIS. We appreciate your
confirmation that a Department of Army permit will not be
required for the proposed project and for confirming our
flood information for the proposed project site.

Your letter, together with this response, will be
included in the Final EIS. We appreciate your interest
and participation in the consultation phase of the
environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Eari Matsukawa, WOA



Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. Nathaniel R. Conner
State Conservationist
Soil Conservation Service
U.S. Department of Agriculture
P.O. Box 50004
Honolulu, HI 96850-0001

Dear Mr. Conner:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 3, 1993 indicating that you have no comments on the subject Draft EIS. Your letter, along with this response, will be included in the Final EIS.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



HAWAII COMMUNITY
DEVELOPMENT AUTHORITY



John D. Walker
County Engineer

Gary Casfield
County Engineer

Michael N. Scarfone
Executive Director

677 Ala Moana Boulevard
Suite 1007
Honolulu, Hawaii
96813
Telephone
(808) 587-2070
Facsimile
(808) 596-3413

RECEIVED

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MAY 3, 1993
HAWAII COMMUNITY
DEVELOPMENT
AUTHORITY

P. O. BOX 50004
HONOLULU, HI
96850-0001

SOIL
CONSERVATION
SERVICE

UNITED STATES
DEPARTMENT OF
AGRICULTURE

Mr. Eric J. Masutomi
Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Hale Kewalo Rental Housing Mixed-Use Development
Draft Environmental Impact Statement

We have reviewed the development plan as requested and have no comments to offer. Thank you for the opportunity to provide comment.

Sincerely,

Eric J. Masutomi
ERIC J. MASUTOMI
State Conservationist

cc: Michael Bajinting, District Conservationist, Honolulu Field Office



United States Department of the Interior



GEOLOGICAL SURVEY
WATER RESOURCES DIVISION
677 Ala Moana Blvd., Suite 415
Honolulu, Hawaii 96813

RECEIVED
MAY 10 1993

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Blvd., Suite 1001
Honolulu, Hawaii 96813

WESOM OLANOVS N. ASVEL, INC.



John D. Waite
Director

Gary Caulfield
Director

Michael N. Saurfore
Executive Director

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. William Meyer
District Chief
Department of the Interior
Geological Survey
677 Ala Moana Boulevard,
Room 415
Honolulu, HI 96813-5412

Dear Mr. Meyer:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 9, 1993 in regard to the subject Draft EIS. We regret that you were unable to participate in the review process. Your letter and this response will be reproduced in the Final EIS.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

Sincerely,

William Meyer
William Meyer
District Chief

Enclosure

cc: Mr. Al Ahana
Housing Finance and Development Corporation
The State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Mr. Brian J. J. Choy
Office of Environmental Quality Control
The State of Hawaii
220 South King Street, 4th Floor
Honolulu, HI 96813

Mr. Earl Matsukawa
Wilson Okamoto & Associates, Inc.
P.O. Box 3530
Honolulu, HI 96811

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 587-3200
Facsimile
(808) 599-3413



DEPARTMENT OF THE NAVY
 COMMANDER
 NAVAL BASE PEARL HARBOR
 BOX 110
 PEARL HARBOR, HAWAII 96860-5020

IN REPLY REFER TO
 11011
 Ser N41/1415
 16 APR 1993

Mr. Eric J. Masutomi
 Housing Finance and Development Corporation
 State of Hawaii
 677 Ala Moana Blvd., Suite 1001
 Honolulu, HI 96813

RECEIVED
 APR 20 1993

WILSON OKAMOTO & ASSOCIATES, INC.

Dear Mr. Masutomi:

HALE KEWALO RENTAL HOUSING MIXED-USE DEVELOPMENT

Thank you for the opportunity to review the subject Draft Environmental Impact Statement (DEIS) of March 29, 1993. The Navy has no comments to offer at this time. Since we have no further use for the DEIS, it is being returned to your office.

Again, thank you for the opportunity to review the DEIS.

Sincerely,


 R. K. KEISER
 Lieutenant Junior Grade, CEC, USN.
 By direction of
 the Commander

Encl:
 (1) Draft Environmental Impact Statement

Copy to: (w/o encl)
 Mr. Al Ahana
 Housing Finance and Development Corporation
 State of Hawaii
 677 Queen Street, Suite 300
 Honolulu, HI 96813
 Mr. Brian J. J. Choy
 Office of Environmental Quality Control
 220 South King St., 4th Floor
 Honolulu, HI 96813
 Mr. Earl Matsukawa
 Wilson Okamoto and Associates, Inc.
 P. O. Box 3530
 Honolulu, HI 96811



HAWAIIAN COMMUNITY DEVELOPMENT AUTHORITY

KAKA'KO
 Many Possibilities Await You

John D. Waite
 General Manager

Gary Caulfield
 General Manager

Michael N. Scaifone
 General Manager

677 Ala Moana Boulevard
 Suite 101
 Honolulu, Hawaii
 96813
 Telephone
 (808) 557-5200
 Facsimile
 (808) 557-5311

Ref. No.: PL GEN 1.15b.2

May 26, 1993

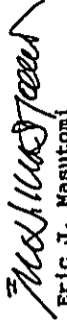
Mr. R. K. Keiser
 Lieutenant Junior Grade, CEC, USN
 Office of the Commander
 Naval Base Pearl Harbor
 Box 110
 Pearl Harbor, HI 96860-5020

Dear Mr. Keiser:

Re: Hale Kewalo Rental Housing Mixed-Use Development
 Draft Environmental Impact Statement (Draft EIS)
 Tax Map Key: 2-3-09: 1
 Honolulu, Oahu, Hawaii

Thank you for your letter of April 16, 1993 indicating that you have no comments on the subject Draft EIS. Your letter, along with this response, will be included in the Final EIS.

Very truly yours,


 Eric J. Masutomi
 Director of Planning

cc: Mr. Al Ahana, HFDC
 Mr. Earl Matsukawa, WOA



HAWAII COUNTY
DEVELOPMENT AUTHORITY



KAWAII
Hawaii (Honolulu) County, HI, USA

John D. Walker
Governor

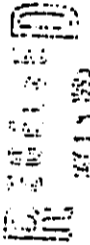
Gary Caulfield
Commissioner

Michael N. Sauer
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
19101
Telephone
(808) 522-2270
Facsimile
(808) 522-2810

(P)1332.3

MAY 17 1993



Hawaii Community Development Authority
677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii 96813

Attention: Mr. Eric J. Masutomi
Gentlemen:

Subject: Hale Kewalo Rental Housing
Mixed-Use Development, Honolulu
Draft Environmental Impact Statement

Thank you for the opportunity to review the subject document. We have no comments to offer.

If there are any questions, please have your staff contact Mr. Ralph Yukumoto of the Planning Branch at 586-0488.

Very truly yours,

Eric J. Masutomi

ERIC J. MASUTOMI
State Public Works Engineer

RY:jnt

cc: Housing Finance & Development Corporation
Attn: Mr. Al Ahana
Office of Environmental Quality Control
Attn: Mr. Brian Choy
Wilson Okamoto & Associates, Inc.
Attn: Mr. Earl Matsukawa

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. Gordon Matsuoka
Staff Services Branch Chief
Public Works Division
Department of Accounting
and General Services
State of Hawaii
P.O. Box 119
Honolulu, HI 96810

Dear Mr. Matsuoka:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)

Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 17, 1993 indicating that you have no comments on the subject Draft EIS. Your letter, along with this response, will be included in the Final EIS.

Very truly yours,

Eric J. Masutomi

ERIC J. MASUTOMI
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

DIRECTOR: 335 MERCHANT ST., RM. 110, HONOLULU, HAWAII 96813 PHONE: (808) 581-3400 FAX: (808) 547-3470

JOHN WUBBE
Governor
MATT HADFIELD
Deputy Governor
BARBARA ELM STATION
Deputy Director
PICK EGGID
Deputy Director
TAKISHA YOSHIMURA
Deputy Director

RECEIVED
MAY 17 1993

May 17, 1993

WILSON OKAMOTO & ASSOC., INC.

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Hale Kewalo Rental Housing Mixed-Use
Development Draft Environmental Impact Statement

On September 23, 1992, we commented on the Draft Environmental Assessment for this project. In addition to our earlier comments, we would like to call your attention to the Model Energy Code, developed under the auspices of this department. We urge that you use the code as a guide for the development of this project. For a copy of the code and any details, please contact Mr. Howard Wiig at 587-3811.

Sincerely,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

MRK/EU:do
cc: HFDC
OEOC
Wilson, Okamoto & Assoc., Inc.

Ref. No.: PL GEN 1.15b.2
May 26, 1993

The Honorable Maurice H. Kaya,
Energy Program Administrator
Department of Business, Economic
Development & Tourism
State of Hawaii
335 Merchant Street, Rm. 110
Honolulu, HI 96813

Dear Mr. Kaya:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 17, 1993 commenting on the subject Draft EIS. Where feasible, we will seek to incorporate elements of the Model Energy Code into the Hale Kewalo project.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



HAWAII COMMUNITY DEVELOPMENT AUTHORITY

KAKAHO
Hawaii Community Development Authority

John D. Walker
Executive Director

Gary Caulfield
Executive Director

Michael N. Scalfone
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 581-3400
Facsimile
(808) 547-3470

JOHN WALKER
CONFIDENTIAL
VALOR GENERAL EDWARD V. RICHARDSON
DIRECTOR OF CIVIL DEFENSE
ROY C. PRICE, SR.
VICE DIRECTOR OF CIVIL DEFENSE



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

May 20, 1993



PHONE (808) 734-3181

KAKA'Ō
Honolulu, Hawaii

John D. Walker
Chairman

Cary Caulfield
Vice Chairman

Michael N. Sordone
Executive Director

WILSON OKAMOTO & ASSOC., INC.

TO: Mr. Eric J. Masutomi
Hawaii Community Development Authority

FROM: Roy C. Price, Sr.
Vice Director of Civil Defense

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS), HALE KEWALO
RENTAL HOUSING MIXED-USE DEVELOPMENT

Thank you for this opportunity to comment on the DEIS on the Hale Kewalo Rental Housing Mixed-Use Development, Honolulu, Oahu, Hawaii; THX 2-03-09: por. 1.

We do not have negative comments specifically directed at this DEIS. However, the impact of potentially destructive tropical storm/hurricane force winds on the two approximately 29-story concrete towers and the five-level parking structure should be addressed. Additionally, the impact of the performance of these structures in these winds on the surrounding area should also be addressed.

If you have further questions, please call Mr. Mel Nishihara of my staff at 734-2161.

cc: Wilson Okamoto & Assoc.

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. Roy C. Price, Sr.
Vice Director of Civil Defense
Department of Defense
State of Hawaii
3949 Diamond Head Road
Honolulu, HI 96816-4495

Dear Mr. Price:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 20, 1993 commenting on the subject Draft EIS. The proposed structures for Hale Kewalo will be designed in compliance with the current City and County of Honolulu Building Code. We are unaware of any studies pertaining to the potential impact that severe tropical storm or hurricane-force winds would have on concrete structures built in compliance with the Code, or how surrounding areas may be affected.

We understand that amendments to the Building Code are forthcoming and that some of these amendments will address building performance in hurricane-force winds. Meanwhile, we would welcome receipt of any information you may have pertaining to the design of the Hale Kewalo structures which would minimize damage to the buildings and surrounding areas under severe winds.

Your letter and this response will be included in the Final EIS. Thank you for your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 591-3000
Facsimile
(808) 591-3111

FACILITIES COPY
CHILDREN'S EDUCATION
SUPERINTENDENT



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 2140
HONOLULU, HAWAII 96820

WILSONS UNIVERSITY ASSOCIATES, INC.

OFFICE OF THE SUPERINTENDENT

April 30, 1993

Mr. Eric J. Masutomi
Hawaii Community Development
Authority (HCDA)
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

SUBJECT: Draft Environmental Impact Statement (Draft EIS)
Hale Kewalo Rental Housing Mixed-Use Development
Honolulu, Oahu, Hawaii
THK: 2 - 3 - 02

The Department of Education (DOE) has reviewed the Draft EIS and is disappointed to note that many concerns we have expressed in a previous draft Environmental Assessment in February, 1993 and in an EIS Preparation Notice for the project have not been answered or addressed satisfactorily.

The major issues for the DOE remain great concerns and are included in the following comments:

- 1) The DOE maintains that projected enrollment growth from the project at schools in the service area listed in our February 13, 1993 letter is still valid:

School	Grades	Projected Students
Kaahumanu Elementary	K-5	95
Central Intermediate	6-8	32
McKinley High School	9-12	42

Your assertion that the projections should be lower due to the negligible impact from studio units is not correct. As was explained to members of the HCDA staff, the student factors used for the projections included studios in the denominator. The exclusion of studio units from the total unit count will require that the factors be recalculated. We were under the assumption that an understanding was reached between the DOE and your staff regarding the method in which the factors were derived and how they are used for future projections.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

Mr. Eric J. Masutomi -2- April 30, 1993

We will continue to revise our projections if we ascertain more specific information about the size and type of units proposed for the project. However, the Draft EIS provides limited information regarding the units and the projections may even be too low.

Your acknowledgement of the fact that Kaahumanu Elementary is at capacity is gratifying. This fact represents one of the primary reasons we oppose the project. We are unable to increase the school capacity due to space limitations. McKinley High School is also projected to increase in enrollment by 1997 due to the many building developments planned in the Mauka Area. May we also point out that the Table 11 on Page 49 of the Social Impact Assessment (SIA) gives the false impression that your projected increase in students due to Hale Kewalo can be accommodated by the remaining capacity at the schools. On the contrary, there are other projects which are mentioned on pages 23-25 which will impact the enrollment of the schools and increase enrollment. Other projects are also in the planning stage. How will the enrollment be accommodated for all of the projects?

Your complaints that you "have been unable to receive definitive information on how the potential demand generated by the Kakaako District is being reconciled with overall demand" is dependent on market conditions. As your market changes and the projects change character, our projections change as well. We have pointed out that the new emphasis on affordable housing in the area is certain to place an even greater stress on schools in the service areas.

Your arguments regarding declining enrollment at Kaahumanu Elementary and McKinley High Schools fail to understand the great changes in the DOE programs in the last five years. A large number of new supplementary programs such as CORE Education, Basic Skills Programs, Gifted and Talented Programs, Learning Centers, and Primary Instructional Needs Programs, require additional classrooms over and above enrollment requirements. The facility capacities cited on Page 49 of the SIA are not absolute numbers but are based on statewide formulas used for comparison and not to determine estimated spaces available. In addition, the elementary schools have received class-size reduction teacher allocations requiring additional classrooms in grades K-2. Hence, decreases in enrollment in the last five years do not reflect a decline in the need for additional classroom space.

Mr. Eric J. Masutomi

-3-

April 30, 1993

2) We believe the area should be considered as a location for a new elementary school or for expansion of McKinley High School. A HCDA document, the Kakaako Community Development District Mauka Area Plan of February, 1990, indicated on page 79 that "the population generated by 19,000 new housing units would require a maximum of five (5) elementary schools within the Mauka Area." On page 83 you indicated that "two elementary schools will be necessary." In planning the Mauka Area HO options for school sites are being offered or proposed by HCDA to the DOE. This site should be an option.

The DEIS document indicates on page 39 of the SIA that "there will be increased demand for public services and public agencies will need to plan for the future population." The DOE has pointed out that we are planning for the future by expressing our opposition to use of the site for housing and reserving the area for school requirements. Unless other schools sites can be provided by HCDA in the Kakaako area, the Hale Kewalo remains one of the few remaining options. On page VIII-1 you concede that "other educational functions could share the facilities or replace ETO in the long-term."

In addition, HCDA indicated in a March 28, 1993, Honolulu Advertiser newspaper article that there is a change in market demand toward more affordable housing in Kakaako. This change will increase the enrollment impact and create definite needs for more classroom space and new schools.

3) All references to the Hawaii State plan regarding education need to indicate how the Department of Education's lower education objectives will be attained. The discussions in the Draft EIS mention only the Educational Training Opportunities (ETO) program and completely ignores any references to the DOE. On page IV-2, Section 226-21-(b)(2) should be addressed: "Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs. On page IV-4, the housing project does not address Objective A (4).

4) The impact of noise during pile driving construction is described to be "difficult to mitigate due to the large (1,000 foot radius) impact area for naturally ventilated classrooms" (page 4 of letter from Y. Ebisu & Associates). The classrooms make of the front of Building A will be impacted, and we insist that if the project becomes a reality, all affected classrooms be provided air-conditioning units by the developer at no charge. The costs to provide adequate power and wiring and installation of air-conditioning units should be included for all affected classrooms before any pile driving begins. Any noise exceeding Department of Health standards for any other part of the campus should be similarly mitigated.

Mr. Eric J. Masutomi

-4-

April 30, 1993

5) Vibrations from pile driving are projected to provide low risk of structural damage according to Dr. Ebisu's report (page 4). However, since the study is only an educated guess, we will demand the full repayment of the costs to repair any structural damage caused by the vibrations to any of the buildings on the campus, notwithstanding the historical buildings.

The assessment report of Dames and Moore is also based on assumptions of the type of soil beneath the area and on other projects in the area rather than on the McKinley campus site. The August 28, 1992, letter states "Predictions such as those made by Dames & Moore or by Y. Ebisu are somewhat judgmental, for site specific conditions will control the transfer of energy from the pile hammer", etc. The DOE prefers to be conservative in order to protect the buildings.

6) We maintain that the scenic view planes of the campus and from the campus will be severely altered. Your answer brushes aside our contention that high rise buildings within the block will greatly change the views from the campus since there are no other high rise buildings on the McKinley High campus or the Hale Kewalo site. The SIA states on pages 39-40:

"The NBC/MCH block is characterized by low rise structures and open areas. The project will alter this character by introducing two high-rises, a parking structure and landscaped open space. the high-rises will be a new element. They will diversify the urban landscape by adding a more city-like appearance to this area."

The DOE acknowledges the growth of high-rise buildings around the block and across Pensacola Street. However, we object to any high-rise structures on the campus.

7) It is certain that the school will be greatly impacted. The SIA states on page 41 that:

"...there will be direct impacts on the existing activities, On a more regional level, with people on-site for a 24-hour period, the neighborhood function of the NBC/MCH block will be altered. From a land use perspective, this can be an optimal use of the land, providing that the various uses can operate compatibly."

The DOE believes that we must look at use of the land educationally and not from a land use perspective.

Mr. Eric J. Masutomi

-5-

April 30, 1993

In the section 4.4, the SIA states regarding impacts:

"The proximity between the residential towers and activities of McKinley High School may lead to incompatibility problems. With residents nearby 24 hours a day, school activities will be under closer scrutiny and noise, light, and traffic impacts may stimulate resident concerns. We found that resident-school compatibility is a problem, and that noise is just one factor in this relationship."

The DOE is opposed to simply allowing the school to shoulder the responsibility of the complaints which will arise. A more effective approach is not to allow the possibility of the complaints to arise.

8) While the traffic study indicates there will be no significant change in traffic volumes or conditions, your statement is "Any use of the project site which generates more peak hour trips than the existing use would 'aggravate traffic!....'"

9) In your discussion on the alternatives to the proposed action you list the site as a potential elementary school site. We believe that this option or the expansion of McKinley High School are preferable alternatives to the use of the site for high-rise towers or for use for University programs. We agree with an HCDA analysis that elementary school sites are needed in the area. Where else can an elementary school site be provided to the DOE in the Mauka Area?

The opportunity for affordable housing will be presented at other Kakaako developments as mentioned in the newspaper article and are preferable to the impacts caused by using the Hale Kewalo site.

Should the "no action" alternative be elected the DOE would address that choice at the appropriate time.

The DOE position is to retain all options related to educational choices. The use of the land for future educational purposes is justifiable due to the projected growth of affordable housing in the Kakaako area, the lack of alternative sites available to the DOE, the existing lack of adequate facility capacity, and HCDA's own statements that public educational services will be impacted.

While we may not have specific plans at present, the DOE is generally in a reactive position based on the development of housing. Since neither HCDA nor any other agency can accurately predict or project how developments will occur in the next ten or twenty years, the DOE must continually react to the changing character of the area.

Mr. Eric J. Masutomi

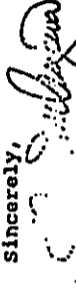
-6-

April 30, 1993

The DOE has no objections to the development of urgently needed housing. We only object to the use of an educational site for housing. We urge the HCDA to consider the social needs of the students and take a broader perspective which encompasses more than the housing. Seeking an alternative site for housing would satisfy your own objectives as well as ours.

Thank you for the additional opportunity to comment.

Sincerely,



Charles T. Roguchni
Superintendent

CTR:hy(1c)

cc: A. Suga, Asst. Supt.
E. Masagatani, HDO
A. Ahana, HFDC
B. J.J. Choy, OEQC
E. Matsukawa, Wilson, Okamoto & Assoc.



DEPARTMENT OF EDUCATION



KAKA'KO
Kaua'i / Honolulu / Oahu / Maui

John D. Walker
Commissioner

Gary Caulfield
Assistant Commissioner

Michael N. Sorfino
Assistant Commissioner

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Charles T. Toguchi
Superintendent
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, HI 96804

Dear Mr. Toguchi:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 30, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. We are baffled by your Department's insistence on promulgating, without any further explanation, enrollment projections that are totally contrary to its own standards. In DOE's letter to HCDA dated February 10, 1993, we were advised that the following student/housing unit factors are now being applied to affordable units in Kakaako: 0.16 elementary, .02 intermediate, and .06 high school. Contrary to your statement, the understanding arrived at between our respective staffs was that, for projection purposes, elderly and studio units need not be factored into the calculations. The latter can be confirmed through a review of the related correspondence between our offices. The enrollments expected to be generated by the Hale Kewalo project, as described in the Draft EIS, are based on these DOE-provided factors (incidentally, HCDA has utilized these multipliers despite the fact that they appear excessive when compared to actual student enrollment generated by existing affordable units in Kakaako and the Downtown area). Note that even if the proposed 78 studio units were included in our calculations, the difference is marginal, resulting in an additional 20 potential students, 13 at the high school level.

67 AB Mauna Kea
Suite 101
1100 Mauna Kea, Hawaii
96703
Telephone
808/947-2501
Facsimile
808/947-2511

The Honorable Charles T. Toguchi
Page Two
May 26, 1993

2 intermediate and 5 elementary. This is far less than the projections you have cited. We will be identifying this matter as an unresolved issue in the Final EIS.

It is unfortunate that the DOE chooses to characterize our responses to its previous letter as "complaints" or "arguments". They are neither. They were and are intended to impress upon the DOE the need to recognize that Kakaako represents only a portion of the service areas for Royal, Kaahumanu, Central and McKinley. While we appreciate the points raised in your letter, they again beg the basic issue: that is, without an adequate understanding of total demand on facilities and services in the area, including the various factors contributing to such demand, it is impossible to predict in any objective fashion beyond that described in the Draft EIS the impact that the Hale Kewalo project may have on the capacities of the respective school facilities. If definitive out-of-District demand information is available, it has not been provided to us by the DOE despite our repeated requests; if it is not available, we would appreciate DOE acknowledging the fact. If the latter is the case and is not remedied, we agree that the DOE will always, as you state, be in a reactive position in the planning and development of school facilities, as well as in attempting to effectively manage the types of policy and program changes the Department has instituted over the last five years.

Chapter VI, Alternatives to the Proposed Action, in the Final EIS has been revised to acknowledge your current position that while the DOE has no specific plans at present, the area should be considered as a location for a new elementary school or for expansion of McKinley High School.

Meanwhile, we are concerned that your comments regarding the HCDA's Mauka Area Plan's references to school facilities seek to reinforce the disturbing misconception that HCDA has somehow been negligent in attempting to work with the DOE to address District-wide educational facility needs.

2.

The fact is that since the adoption of the Kakaako Community Development District Plan in 1982, HCDA has continuously and aggressively sought to engage the DOE in devising a proactive, long-range strategy and program for the provision of school facilities within the District's service area. As reflected in the DOE's recent reactions to our request for out-of-District demand information, the Department's response to these overtures has been consistently lukewarm and evasive. Your comments ignore the fact that it was the DOE, in response to concerns expressed by HCDA, that earlier dismissed the need for and viability of the Pohukaina and KCC sites for elementary school use. They ignore the fact that it was the DOE that, as recently as 1990, concluded that the existing schools in the area would be sufficient to accommodate anticipated increases in the projected population of school age children originating in the Kakaako District. Your comments ignore the fact that growth projections for the Kakaako District have been constantly refined by HCDA and, as adjusted, have been provided to the DOE to ensure that both our agencies are working with the same base information. As you know, this exchange of information between the DOE and HCDA has been occurring over an extended period of time. The HCDA has always been responsive in revising its school enrollment projections based on updated ratios provided by your Department; it is regretful that the DOE does not publicly react in kind by utilizing the most recent "likely" projections provided you, repeating instead the gross, maximum build out scenarios cited in the Plan.

As we have stated before, we have been encouraged by the recent steps taken by the DOE toward the preparation of an Action Plan for Honolulu District facilities. "Planning for the future" entails more than mere reservation of a site for a yet to be determined future need, particularly in the face of known, critical competing public demands. We are hopeful that the strategic planning effort now being initiated by the DOE will prove useful not only in improving methods for forecasting demand, but also in defining meaningful options and

programs to meet the area's long-term education needs. We remain committed to working with your Department on this important endeavor.

3. The Draft EIS makes reference to Hawaii State Plan objectives and policies which the proposed Hale Kewalo project will principally address. Omitted are objectives and policies it is not necessarily aimed at addressing. Thus, while the project may include elements relating to such items as lower education (Building 857) and recreation (park/open space), associated State Plan provisions are not listed; neither are objectives for the economy, facility systems, etc.
4. If pile-driving must be scheduled while school is in session, then air conditioning will be provided as needed for naturally ventilated classrooms and offices at the project's expense.
5. The construction contractor is liable for any damages incurred on properties outside of the project site as a result of pile driving. It is in the contractor's interest to be conservative in determining the appropriate method of pile driving.
6. We apologize if you misconstrued our previous comments as an attempt to "brush aside" your contention that "high-rise buildings within the block will greatly change the views from campus." We did acknowledge that the aesthetic character of specific locations within the McKinley High School campus may change as a result of the proximity of the towers. Moreover, both the Social Impact Assessment and the Draft and Final EIS state that the Hale Kewalo project will introduce a new element to the overall low-rise character of the block. Finally, for purposes of clarification, it is important to note that the project does not as you claim involve the placement of any structure on the school campus.
7. This statement is taken out of context and your comments are obviously intended to make a rhetorical point. The immediately following section in the Social Impact Assessment on land use

The Honorable Charles T. Toguchi
Page Five
May 26, 1993

compatibility discusses the issues you are apparently alluding to.

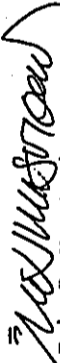
The purpose of the EIS is to disclose potential impacts. The statement you refer to does this. Your following comment does not bear on the adequacy of the Draft EIS.

8. Your reference to our response is completely out of context. We quoted your term "aggravate" to emphasize that it is a relative term. The intersection of Pensacola Street and Kapiolani Boulevard has a very high vehicle capacity. Thus, the addition of project-generated traffic during peak hours is proportionately small, as is the degree of "aggravation."

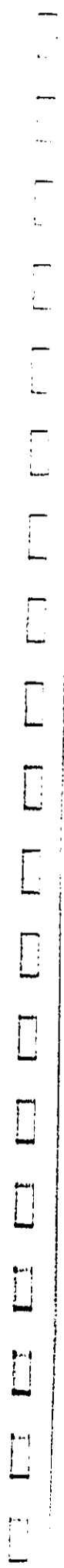
9. We, again, acknowledge your position in the Hale Kewalo project. We disagree, however, that the DOE must necessarily continue to limit itself to a reactive role in facilities planning. We continue to look forward to the opportunity to work with the Department in a more collaborative manner in identifying future opportunities and needs, and in the development of meaningful strategies to meet our shared concerns relating to the timely delivery of educational facilities, programs and services for the Kakaako area.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



JOHN C. LEWIS, M.D.
DIRECTOR OF HEALTH



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3178
HONOLULU, HAWAII 96813

JOHN WAINES
GOVERNOR OF HAWAII

In reply, please refer to:

92-312/epo

March 12, 1993

Mailed on 16th of March

Housing Finance & Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813
Attn: Mr. Mike McElroy

Dear Sir:

Subject: Hale Kewalo Rental Housing Mixed-Use Development
Environmental Impact Statement Preparation Notice (EISP)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-09: 1

Thank you for allowing us to review and comment on the subject project. The Department of Health (DOH) have the following comments to offer:

Wastewater

The following comments were provided for the Draft Environmental Assessment (DEA). These comments are still applicable. The subject project is located within the County sewer service system. As the area is severed, we have no objections to the development of a rental housing project with parking structure and an employment training facility, provided that the project is connected to the public sewers.

The sewage system serving the project site is part of a regional system extending from Kuliouou to Huanu. The project site is in close proximity to a 48 inch trunk main at Kapiolani Boulevard. Determination of sewer adequacy is contingent upon the approval of an "Application for Sewer Connection" by the City and County, Department of Public Works, Division of Wastewater Management. A Wastewater System Facilities charge (fee) is also applicable to the proposed project.

The developer should work closely with the County to assure the availability of additional treatment capacity and adequacy for the project. Non-availability of treatment capacity will not be an acceptable justification for use of any private treatment works.

If you should have any questions on this matter, please contact Ms. Lori Kajiwara of the Wastewater Branch at 586-4290.

JOHN C. LEWIS, M.D.
DIRECTOR OF HEALTH



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3178
HONOLULU, HAWAII 96813

JOHN WAINES
GOVERNOR OF HAWAII

In reply, please refer to:

92-312/epo

May 11, 1993

Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Attn: Eric J. Masutomi

Dear Sir:

Subject: Draft Environmental Impact Statement (DEIS)
Hale Kewalo Rental Housing Mixed-Use Development
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-09: 1

Thank you for allowing us to review and comment on the subject document. We have previously commented on this project for the Draft Environmental Assessment and Environmental Impact Statement Preparation Notice in our letters dated October 22, 1992 and March 12, 1993 (enclosed).

We have no further comments to offer at this time.

Very truly yours,

John C. Lewis
JOHN C. LEWIS, M.D.
Director of Health

Enclosure

c: Housing Finance and Development Corporation

RECEIVED

'93 MAY 13 AM 10 02

HAWAII COMMUNITY
DEVELOPMENT
AUTHORITY

Housing Finance & Development Corporation
March 12, 1993
Page 3

Very truly yours,
John C. Lehin
FOR JOHN C. LEHIN, M.D.
Director of Health

cc: Wastewater Branch
Solid and Hazardous Waste Branch
Noise and Radiation Branch
Hawaii Community Development Corporation
Office of Environmental Quality Control

Housing Finance & Development Corporation
March 12, 1993
Page 2

Solid Waste

The Office of Solid Waste Management would reiterate the comments offered in the attached letter regarding the Environmental Assessment for this project. We stress the need for development and implementation of a waste minimization plan for use in the construction and occupancy of the project. The design of the two multi-unit buildings should provide collection areas for recyclables in order for the tenants to participate in recycling efforts to separate glass, paper, plastic, and aluminum. Residential high rises should investigate inclusion of chutes for recyclables as well as for trash.

This Office also strongly encourages the use of secondary materials during construction and occupancy of the development. Act 213, Session Laws of Hawaii 1992, formalizes the State's Commitment to use of glassphalt (crushed glass in asphalt) for road paving purposes. As this project will be funded by the State, glassphalt should be used for all road paving purposes when practicable.

If you should have any questions on this matter, please call Carrie McCabe of the Solid Waste Management at 586-4243.

Noise

The following comments were provided for the Draft Environmental Assessment (DEA). These comments are still applicable. Through facility design, sound levels emanating from stationary equipment, such as air conditioning units, exhaust fans, and generators, must be attenuated to meet the allowable levels of Department of Health (DOH) Administrative Rules, Chapter 11-43, "Community Noise Control for Oahu."

Construction activities must comply with the provisions of DOH Administrative Rules, Chapter 11-43, "Community Noise Control for Oahu."

- a. The contractor must obtain a noise permit if the noise levels from the construction activities are expected to exceed allowable levels of the rules.
- b. Construction equipment and on-site vehicles requiring an exhaust of gas or air must be equipped with mufflers.
- c. The contractor must comply with the requirements specified in the rules pertaining to construction activities and additional conditions issued with the permit.

Traffic noise from heavy vehicles travelling to and from the project site should be minimized within residential areas and must comply with the provisions of DOH Administrative Rules, Chapter 11-42, "Vehicular Noise Control for Oahu."



JOHN WHITE
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 209
HONOLULU, HAWAII 96820

JOHN C. LEWIS, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:

92-312/epo

October 22, 1992

Mr. Harold Edwards
Project Coordinator
Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 300
500 Ala Moana Boulevard
Honolulu, Hawaii

Dear Mr. Edwards:

Subject: Hale Kewalo Rental Housing Development
Draft Environmental Assessment (EA)
TMK: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject project. We have the following comments to offer:

Wastewater

The subject project is located within the County sewer service system. As the area is sewer, we have no objections to the development of a rental housing project with parking structure and an employment training facility, provided that the project is connected to the public sewers.

The sewage system serving the project site is part of a regional system extending from Kuliouou to Nuuanu. The project site is in close proximity to a 48" trunk main at Kapiolani Boulevard. Determination of sewer adequacy is contingent upon the approval of an "Application for Sewer Connection" by the City and County, Department of Public Works, Division of Wastewater Management. A Wastewater System Facilities charge (fee) is also applicable to the proposed project.

The developer should work closely with the County to assure the availability of additional treatment capacity and adequacy for the project. Non-availability of treatment capacity will not be an acceptable justification for use of any private treatment works.

Mr. Harold Edwards
October 22, 1992
Page 2

If you should have any questions on this matter, please contact Ms. Lori Kajiwara of the Wastewater Branch at 586-4290.

Solid Waste

The discussion in the Draft EA of the solid waste impacts and infrastructural needs of this project are inadequate. A project which will create 530 rental apartments will have a significant impact on solid waste generation during demolition of the existing site as well as construction and occupancy of the new development. Since this project will be financed by the State of Hawaii's Housing Finance and Development Corporation, it is necessary to address the impacts of the project upon the progress of the State's solid waste diversion goals of twenty-five (25) percent by the year 1995 and fifty percent (50%) by the year 2000 as mandated by Act 324-91.

In order to achieve the State's solid waste reduction goals, and every new and existing development should include recycling, waste reduction measures in their design and construction. Construction and demolition waste can be reduced through implementation of waste minimization measures and recycling. We also suggest that the occupants of the project be allocated sufficient space for collection of recyclable materials, either within their units or in a central area of their building. It is likely that many of the residents will participate in recycling efforts as an income supplement or as a benefit to the community.

We also strongly encourage the inclusion of secondary resources (recycled materials) in the construction and landscaping of the project, such as recycled concrete, compost as a soil amendment, and crushed glass in the asphalt.

If you should have any questions on this matter, please contact Mr. John Harder at of the Office of Solid Waste Management at 586-4240.

Noise

1. Through facility design, sound levels emanating from stationary equipment, such as air conditioning units, exhaust fans, and generators, must be attenuated to meet the allowable levels of Department of Health (DOH) Administrative Rules, Chapter 11-43, "Community Noise Control for Oahu."
2. Construction activities must comply with the provisions of DOH Administrative Rules, Chapter 11-43, "Community Noise Control for Oahu."

Mr. Harold Edwards
October 22, 1992
Page 3

92-312

- a. The contractor must obtain a noise permit if the noise levels from the construction activities are expected to exceed allowable levels of the rules.
 - b. Construction equipment and on-site vehicles requiring an exhaust of gas or air must be equipped with mufflers.
 - c. The contractor must comply with the requirements specified in the rules pertaining to construction activities and additional conditions issued with the permit.
2. Traffic noise from heavy vehicles travelling to and from the project site should be minimized within residential areas and must comply with the provisions of DOH Administrative Rules, Chapter 11-42, "Vehicular Noise Control for Oahu."

If you should have any questions on this matter, please contact Mr. Jerry Haruno of the Noise and Radiation Branch at 586-4701.

Very truly yours,

John C. Lewin

FOR JOHN C. LEWIN, M.D.
Director of Health

c: Wilson Okamoto & Associates, Inc.
Office of Environmental Quality Control
Wastewater Branch
Office of Solid Waste Management
Noise and Radiation Branch



John D. Walker
County Engineer

Gary Caulfield
County Engineer

Michael N. Scifone
County Engineer

477 Al Moana Boulevard
Suite 102
Honolulu, Hawaii 96813
Telephone: 923-5030
Telex: 923-5030
Fax: 923-5031

Ref. No.: PL GEN 1.15b.2
May 26, 1993

The Honorable John C. Lewin, M.D.
Director
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801

Dear Dr. Lewin:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 11, 1993 referring to comments in your letters of October 22, 1992 and March 12, 1993 on the Draft Environmental Assessment and EIS Preparation Notice. Both of these earlier letters were received well after the deadlines for comments on the respective documents, and could not be responded to in time for publication in subsequent documents. Offered below are our responses to your earlier comments:

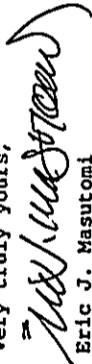
- 1. Wastewater
The HCDA has obtained a sewer connection approval from the City and County Division of Wastewater Management, although an amendment to the number of units served may be necessary, depending upon the final unit count for the Hale Kewalo project.
- 2. Solid Waste
We will take your recommendations for a waste minimization plan under consideration in the design of the proposed project. We will also consider the use of "glasphalt" for road paving where practicable.
- 3. Noise
All powered mechanical equipment at the project will be installed to meet allowable noise levels established by DOH rules in Chapter 11-43,

The Honorable John C. Lewin, M.D.
Page Two
May 26, 1993

"Community Noise Control for Oahu. As discussed in the Draft EIS in Section V.A.1. Noise, the contractor will comply with all applicable noise provisions of the DOH Administrative Rules, including Chapter 11-43, "Community Noise Control for Oahu." Construction vehicles using roadways in residential areas will comply with noise provisions in Chapter 11-42, "Vehicular Noise Control for Oahu."

This response, along with your recent and prior comment letters, will be reproduced in the forthcoming Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

STATE OF HAWAII
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 33 SOUTH KING STREET, 4TH FLOOR
 HONOLULU, HAWAII 96813

DEPUTIES
 JAMES P. BEPPELLER
 DONNA L. HANAUKE

AQUACULTURE DEVELOPMENT PROGRAM
 AQUATIC RESOURCES CONSERVATION AND ENVIRONMENTAL AFFAIRS
 CONSERVATION AND RESOURCES ENFORCEMENT
 CONSERVATION CONTRACTS
 FORESTRY AND RESTORATION DIVISION
 LAND MANAGEMENT
 STATE PARKS
 WATER AND LAND DEVELOPMENT

LOG NO: 7980
 DOC NO: 9305TD18



May 12, 1993

Mr. Eric J. Masutomi
 Director of Planning
 Hawaii Community Development Authority
 677 Ala Moana Boulevard, Suite 1001
 Honolulu, Hawaii 96813

Dear Mr. Masutomi:

SUBJECT: Hale Kewalo Rental Housing Mixed-Use Development, Draft Environmental Impact Statement (DEIS)
 Honolulu, Kona, O'ahu
 TMK: 2-2-9: 1

Thank you for the opportunity to review this project. The DEIS correctly identifies potential adverse effects of the project on historic sites, including the McKinley High School Campus and possible buried sites that would be significant for the information on Hawaiian history and prehistory that they contain. The DEIS also makes a commitment to gather information needed to determine the effects of the project and to mitigate any adverse effects that are identified.

Vibration from test pile driving will be monitored seismographically to determine possible effects at the McKinley High School Campus. Construction techniques will be modified, if necessary, based on these test results to ensure that there is "no effect" to structures at the McKinley High School Campus.

Mr. Eric Masutomi
 Page 2

A subsurface archaeological inventory survey for buried historic sites will follow demolition of existing structures and precede new construction. A specific concern is the possible presence of wetland deposits that might contain information on environmental change. If wetland deposits are identified in the subsurface inventory survey they will be sampled for dating materials and pollen. If inventory survey identifies significant historic sites, and it is determined that the project will have an "adverse effect" on these sites, then a mitigation plan will be developed and implemented. Acceptable reports of the inventory survey and any subsequent mitigation work must be submitted to the Historic Preservation Division.

Sincerely,

Don Hibbard

DON HIBBARD, Administrator
 State Historic Preservation Division

TE: bek

c Al Ahana, Housing Finance and Development Corporation
 Brian J.J. Choy, Office of Environmental Quality Control
 Earl Matsukawa, Wilson Okamoto & Associates, Inc.



HAWAII QUALITY
DEVELOPMENT AUTHORITY



KAWAHO
Hawaii's Quality Growth Plan

John D. Walker
Chairman

Cary Caulfield
Chairman

Michael N. Scorfano
Executive Director

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. Don J. Hibbard
Administrator
State Historic
Preservation Division
Department of Land and
Natural Resources
6th Floor
33 South King Street
Honolulu, HI 96813

Dear Mr. Hibbard:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 12, 1993 concurring with the assessment of project impacts and associated mitigation measures for protecting archaeological and historical resources, as presented in the subject Draft EIS.

Your letter and this response will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Eari Matsukawa, WOA

627 Ala Moana Boulevard
Suite 1111
Honolulu, Hawaii
96813
Telephone
(808) 527-2000
Facsimile
(808) 526-2613

JOHN HANSEN
Secretary

REX D. JOHNSON
Director
DEPT. DIRECTORS
JOYCE T. QUINE
AL F. SCHWARTZ
JEANNE H. SCHWARTZ
CALVIN H. TSUDA
INBERRY REFER TO:
STP 8.5172



HAWAII STATE
DEPARTMENT OF TRANSPORTATION



KAKAOKO
Wilson Okamoto & Assoc., Inc.

John D. Wahee
Secretary

Gary Caulfield
Secretary

Michael N. Scarfone
Secretary



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5007

RECEIVED
MAY 11 1993

WILSON OKAMOTO & ASSOC., INC.

April 28, 1993

Mr. Eric J. Masutomi
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Draft Environmental Impact Statement (DEIS)
Hale Kewalo Rental Housing Mixed Use Development
TMK: 2-3-09: 1

The Traffic Study (Appendix C of the DEIS) primarily evaluated the impacts generated by the proposed development on the local streets and intersections. The study should also include an impact analysis on the H-1 on/off ramps at Ward, Pensacola, and Piikoi Streets, particularly in view of the projected growth of the Kakaako redevelopment area.

We would like to suggest that consideration be given to aligning the development's Pensacola Street access with Kamale Street and providing another access point from Kapiolani Boulevard for the convenience of the motorists.

Thank you for the opportunity to provide comments.

Sincerely,

Rex D. Johnson
Director of Transportation

c: Mr. Al Ahana, HEDC
Mr. Brian Choy, OEQC
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 587-3070
Facsimile
(808) 595-3813

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Rex D. Johnson
Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, HI 96813

Dear Mr. Johnson:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 28, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. As indicated by the Traffic Study in the Draft EIS, project-related traffic disperses rapidly as the distance from the proposed project site increases. As a result, the project-related traffic impacts at the H-1 on/off ramps you mention would be negligible. The inclusion of future traffic associated with the overall development of the Kakaako area would further reduce the proportion of impact that the proposed project would have.
2. Your suggestion of aligning the development's Pensacola Street access with Kamale Street is problematic as it could require the demolition of Building 857, a structure that we hope to retain. Nonetheless, our project engineers are currently examining this and other options with the City's Department of Transportation Services. We will apprise you of the results of these discussions. We will also take into consideration your suggestion of providing another access point from Kapiolani Boulevard.

The Honorable Rex D. Johnson
Page Two
May 26, 1993

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Eari Matsukawa, WOA



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 '98 MAY 19 AM 9 57
 HAWAII COMMUNITY
 DEVELOPMENT
 AUTHORITY



STATE OF HAWAII
 OFFICE OF ENVIRONMENTAL QUALITY CONTROL
 220 SOUTH KING STREET
 FOURTH FLOOR
 HONOLULU, HAWAII 96813
 TELEPHONE (808) 548-1186

May 17, 1993

Mr. Eric Masutomi
 Hawaii Community Development Authority
 677 Ala Moana Boulevard, Suite 1001
 Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Draft Environmental Impact Statement for the Hale Kewalo
 Rental Housing Mixed-Use Development

Thank you for the opportunity to review and comment on the subject document. We have the following comment.

Please provide a list of all the necessary approvals required for the above project in the Final Environmental Impact Statement.

If you have any questions, please call Jeyan Thirugnanam at 586-4185.

Sincerely,

Brian J. Choy
 Brian J. J. Choy
 Director

cc: Wilson Okamoto and Associates, Inc.

Ref. No.: PL GEN 1.15b.2
 May 26, 1993

The Honorable Brian J.J. Choy
 Director
 Office of Environmental
 Quality Control
 State of Hawaii
 220 South King Street, Fourth Floor
 Honolulu, HI 96813

Dear Mr. Choy:

Re: Hale Kewalo Rental Housing Mixed-Use
 Development
 Draft Environmental Impact Statement
 (Draft EIS)
 Tax Map Key: 2-3-09: 1
 Honolulu, Oahu, Hawaii

Thank you for your letter of May 17, 1993 commenting on the subject Draft EIS. We will provide a list of all the necessary approvals required for the project in the Final EIS.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
 Eric J. Masutomi
 Director of Planning

cc: Mr. Al Ahana, HFDC
 Mr. Earl Matsukawa, MOA

677 Ala Moana Boulevard
 Suite 1001
 Honolulu, Hawaii
 96813
 Telephone
 (808) 580-2020
 Facsimile
 (808) 580-2411



OFFICE OF STATE PLANNING

Office of the Governor

MAILING ADDRESS: P.O. BOX 2442 HONOLULU HAWAII 96824-2442
STREET ADDRESS: 200 SOUTH HOTEL STREET, 7TH FLOOR
TELEPHONE: (808) 548-2944, 547-9600

FAC. DIRECTOR'S OFFICE: 547-2944
PLANNING DIVISION: 547-2924

The Honorable Michael Scarfone
Page 2
May 11, 1993

Ref. No. C-41

May 11, 1993

RECEIVED
MAY 11 1993

WILSON OKAMOTO & ASSOCIATES, INC.

Thank you for the opportunity to comment on this draft environmental impact statement. If you have any questions, please contact Harold Lao at 587-2883.

Harold S. Masumoto
Harold S. Masumoto
Director

MEMORANDUM

TO: The Honorable Michael Scarfone
Executive Director
Hawaii Community Development Authority

ATTN: Mr. Eric J. Masutomi

SUBJECT: Draft Environmental Impact Statement
Hale Kewalo Rental Housing Mixed-Use Development

cc: Housing Finance & Dev. Corp.
Office of Environmental Quality Control
Wilson Okamoto and Associates

We have reviewed the Draft Environmental Impact Statement for the proposed Hale Kewalo Rental Housing Mixed-Use Development.

The proposed Hale Kewalo Rental Housing Mixed-Use Development will provide some relief to the current housing deficit, as well as stimulate the State's economy.

Although temporary in nature, construction impacts may pose problems especially with regard to fugitive dust, traffic congestion, and pile driving activities. These impacts may also adversely affect the businesses in the area. In addition, the project is also in proximity to McKinley High School, and to avoid disruption to the academic atmosphere, nighttime construction should be considered, if feasible.



HAWAIIAN
DEVELOPMENT
ALERTNESS



KAKAKO
Hawaii's Economic Growth Engine

John D. Washburn
Chairman

Gary Caulfield
Chairman

Michael N. Scarfone
Executive Director

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Harold S. Masumoto
Director
Office of State Planning
State of Hawaii
P.O. Box 3540
Honolulu, HI 96811

Dear Mr. Masumoto:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
HONOLULU, OAHU, HAWAII

Thank you for your letter of May 11, 1993 commenting on the subject Draft EIS. We will note in the Final EIS that fugitive dust, traffic congestion and noise from pile driving during construction could adversely affect businesses as well as residents in the vicinity and the high school. We shall take into consideration your suggestion for nighttime construction to minimize noise impacts while classes are in session at the high school. This option will be discussed with the State Department of Health, particularly with respect to the potential tradeoff that such a construction schedule may have on residents in the area who may be adversely affected by nighttime noise.

Your letter and this response will be included in the Final EIS. Thank you for your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

677 Ala Moana Boulevard
Suite 201
Honolulu, Hawaii
96813
Telephone
(808) 561-3500
Facsimile
(808) 561-3411

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU



COPY

April 27, 1993

RECEIVED
APR 27 1993

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

WILSON OKAMOTO & ASSOC., INC.

Dear Mr. Masutomi:

Subject: Your Letter of March 29, 1993 Regarding the Draft Environmental Impact Statement (EIS) for the Proposed Hale Kewalo Rental Housing Mixed-Use Development Project. TMK. 2-3-09: 01. Pensacola Street

Thank you for the opportunity to comment on the Draft EIS for the proposed Hale Kewalo Development Project. Our comments of February 1, 1993, in response to the EIS Preparation Notice, are included in Section X and are still applicable.

If you have any questions, please contact Roy Doi at 527-5235.

Very truly yours,

KAZU HAYASHIDA
Manager and Chief Engineer

cc: Housing Finance and Development Corporation
Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.



HAWAII COMMUNITY
DEVELOPMENT AUTHORITY



KAKAWAO
Water Resources Center of the State

John D. White
General Manager

Gary Caulfield
Assistant General Manager

Michael N. Scudone
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 527-5235
Facsimile

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Kazu Hayashida
Manager and Chief Engineer
Board of Water Supply
City & County of Honolulu
630 South Beretania Street
Honolulu, HI 96843

Dear Mr. Hayashida:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 27, 1993 indicating that you have no further comments pertaining to the Draft EIS. Your earlier letter of February 1, 1993 and our response to that letter will again be reproduced in the forthcoming Final EIS, as will your recent letter and this response. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Hatsukawa, WOA

RECEIVED
MAY 14 1993

WILSON OKAMOTO & ASSOC., INC.

PB 93-387

April 12, 1993

Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Attn: Eric J. Masutomi

Gentlemen:

Subject: Hale Kewalo Rental Housing Mixed-Use
Development - Draft EIS

We have reviewed the subject draft EIS and have no comments to offer. Thank you for allowing us to review the document.

Very truly yours,

Herbert K. Muraoka
HERBERT K. MURAOKA
Director and Building Superintendent

CJ/CN:jo
cc: J. Harada
Housing Finance & Develop. Corp.
(Al Ahana)
Office of Environmental Quality Control
(Brian J. J. Choy)
Wilson Okamoto & Assoc., Inc.
(Earl Matsukawa)



HAWAII COMMUNITY DEVELOPMENT AUTHORITY



John D. Walker
Commissioner

Gary Caulfield
Director

Michael N. Scarfone
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 592-3000
Facsimile
(808) 592-3411

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Herbert Muraoka
Director
Building Department
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Muraoka:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 12, 1993 indicating that you have no comments on the subject Draft EIS. Your letter, along with this response, will be included in the Final EIS.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CITY AND COUNTY OF HONOLULU

830 SOUTH KING STREET, 8TH FLOOR
HONOLULU, HAWAII 96813
PHONE: (808) 523-7427 FAX: (808) 527-8499

'98 MAY 21 AM 9 52



HAWAII COMMUNITY
DEVELOPMENT AUTHORITY
GARY M. SCARFONE
DEPUTY DIRECTOR

FRANK F. ASH
MAYOR

May 13, 1993

Mr. Michael Scarfone, Executive Director
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Attention: Mr. Eric Masutomi
Dear Mr. Scarfone:

Subject: Hale Kewalo Rental Housing Mixed-Use Development
Draft Environmental Impact Statement (DEIS)

We have no comments to offer on the Draft Environmental Impact Statement for the Hale Kewalo Rental Housing Mixed-Use Development located in Honolulu, Oahu. We have reviewed the subject DEIS and understand that 60 percent of the units in the project will be made affordable to individuals and families with incomes below 80 percent of median, and the remaining units will be made affordable to individuals and families between 80 and 120 percent of the median income. We commend your agency in developing a project which makes all of the units affordable to families earning less than 120 percent of median income.

Should you have any questions, please contact Jason Ching of our Planning and Analysis Division at 523-4368.

Thank you for the opportunity to comment.

Sincerely,

E. JAMES TURSE
Director

cc: Housing Finance and Development Corporation
Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.



John D. Washie
Commissioner

Gary Caulfield
Commissioner

Michael N. Scarfone
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone:
(808) 523-3000
Facsimile:
(808) 523-3411

Ref. No.: PL GEN 1.15b.2
May 26, 1993

The Honorable E. James Turse
Director
Department of Housing and Community Development
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Turse:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 13, 1993 indicating that you have no comments on the subject Draft EIS. We appreciate your supportive comment on our effort to develop this affordable housing project. Your letter, along with this response, will be included in the Final EIS.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

DEPARTMENT OF PARKS AND RECREATION

CITY AND COUNTY OF HONOLULU

RECEIVED

MAY 19 AM 9 57

840 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK P. PASI
MAYOR

Hawaii Community Development Authority
Page Two
May 17, 1993

WALTER M. OZAWA
DIRECTOR
ALVIN E. CAH
DEPUTY DIRECTOR

If you have any questions, please call John Morihara of our
Advance Planning Branch at 523-4246.

Sincerely,
Walter M. Ozawa

For WALTER M. OZAWA, Director

May 17, 1993

Hawaii Community Development Authority,
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Attention Mr. Eric J. Masutomi

Gentlemen:

Subject: Draft Environmental Impact Statement for the
Hale Kewalo Rental Housing Development
Tax Map Key 2-3-09: 01
Honolulu, Oahu, Hawaii

Thank you for the opportunity to review the Draft
Environmental Impact Statement (DEIS) for the Hale Kewalo
Rental Housing Mixed-Use Project.

It is our understanding that the project will provide two
recreational resources. There will be 1.75 acres of land
that will be set aside for park/open space and a private
recreational facility for use by the tenants of the project.

We recommend that the 1.75-acre parcel be designated for
public recreational use to meet the increasing needs of the
community in Kakaako. Although you are not required to meet
City standards, if the 1.75-acre space is used for public
recreational space, the proposed project will have to meet
our standards for park dedication required for new
residential development.

Your plans also call for the creation of a 35,988-square-foot
private recreational facility for use by residents of the
project. This private facility will include a tot lot,
exercise area, meeting/conference rooms, barbecue,
basketball/volleyball courts, and a grassed area. We support
your plans for tenant use and are sure that these facilities
will be greatly appreciated by the project residents.
Hopefully this facility will be available to all residents of
the Hale Kewalo project.

We Add Quality to Life

WMO:js

cc: Housing Finance and Development Corporation
(Attention: Al Ahana)
Office of Environmental Quality Control
(Attention: Mr. Brian J.J. Choy)
Wilson Okamoto and Associates, Inc.
(Attention: Mr. Earl Matsukawa)



HAWAII COMPANY
ENVIRONMENTAL AGENCY



KAKAIAKO
Papa Hānau, Kōkae, Pūkae

John D. Walker
Executive Director

Gary Caulfield
Assistant Director

Michael N. Scarfone
Assistant Director

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Walter M. Ozawa
Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Ozawa:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 17, 1993 commenting on the subject Draft EIS.

The 1.75-acre park will be for public recreational use, although we have yet to determine if it will be dedicated to the city. The private recreational facility within the project will be available for use by all Hale Kewalo residents.

Your letter, together with this response, will be included in the final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
808/538-2626
Fax
808/538-2626

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

RECEIVED
 APR 13 PM 2 55

HAWAIIAN COMMUNITY
 DEVELOPMENT
 AUTHORITY
 DIRECTOR AND CHIEF ENGINEER
 FELIX B. LUTERICO
 DEPUTY DIRECTOR
 ENV 93-86



April 8, 1993

Mr. Eric Masutomi
 Director of Planning
 Hawaii Community Development Authority
 State of Hawaii
 677 Ala Moana Boulevard, Suite 1001
 Honolulu, Hawaii 96813


Dear Mr. Masutomi:

Subject: Draft Environmental Impact Statement (DEIS)
 Hale Kewalo Rental Housing Mixed-Use Development
 TMK:2-3-09:1

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

1. In the Summary Section, you mentioned that the total units of the proposed project will be 530 units. However, we wish to remind you that the Division of Wastewater Management granted sewer connection approval on February 13, 1992 for 522 units only.
2. In your March 29, 1993 letter, you stated that long-term and short-term impacts on storm water discharge will be addressed in the DEIS. However, we could not find any statements in the DEIS addressing this issue.

We appreciate the opportunity of reviewing the subject DEIS. If you have any questions, please contact Mr. Alex Ho, Environmental Engineer, at 523-4150.

Very truly yours,

 C. MICHAEL BARRETT
 Director and Chief Engineer

cc: Housing Finance and Development Corporation (Al Ahana)



John D. Waihee
 Mayor

Gary Caudicelli
 Chairman

Michael N. Soufione
 Treasurer

677 Ala Moana Boulevard
 Suite 1001
 Honolulu, Hawaii
 96813
 Telephone
 (813) 547-2500
 Facsimile
 (813) 547-2413

Ref. No.: PL GEN 1.15b.2
 May 26, 1993

The Honorable C. Michael Street
 Director and Chief Engineer
 Department of Public Works
 City & County of Honolulu
 650 South King Street
 Honolulu, HI 96813

Dear Mr. Street:

Re: Hale Kewalo Rental Housing Mixed-Use
 Development
 Draft Environmental Impact Statement
 (Draft EIS)
 Tax Map Key: 2-3-09: 1
 Honolulu, Oahu, Hawaii


Thank you for your letter of April 8, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. As stated in our previous response of March 29, 1993, the unit counts provided in the DEIS are approximate. We acknowledge, however, the requirement for a sewer connection approval and will make an official request if the final unit count deviates from the currently approved count.
2. We regret the inadvertent omission from the Draft EIS of the discussion pertaining to the short- and long-term impacts of stormwater runoff from the site. The Draft EIS provided a description of the proposed long-term drainage plan on page II-9. We have included a discussion of impacts in the Final EIS.

The Honorable C. Michael Street
Page Two
May 26, 1993

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

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



ROBIN FOSTER
CHIEF PLANNING OFFICER
NOLAN O. LIBBY, JR.
DEPUTY CHIEF PLANNING OFFICER
TH 4/93-936

April 30, 1993

RECEIVED
MAY 4 1993
WILSON OKAMOTO & ASSOC., INC.

Mr. Michael N. Scarfone, Executive Director
Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Attn: Eric J. Masutomi

Dear Mr. Scarfone:

Draft Environmental Impact Statement (DEIS) for
the Hale Kewalo Rental Housing Mixed-Use Development
Honolulu, Oahu, Hawaii. Tax Map Key: 2-3-09:1

In response to your letter of March 29, 1993, we have reviewed the subject DEIS and offer the following comments:

1. The Final EIS should include a section titled "Relationship to Plans and Policies," which should address the relationship of the proposed project to the City and County's General and Development Plans, as well as land use and zoning policies. An explanation for exceeding the building height limit of 60 feet for this area as stated in Section 24-2.2(b)(6)(C) of the Development Plan Special Provisions for the Primary Urban Center and the potential visual impact on the surrounding neighborhood should also be discussed in this section.
2. Section VI of the DEIS lacks a thorough discussion of alternate sites and their constraints in relation to the proposed project site. The Final EIS should consider a minimum of three feasible alternate sites and should discuss the criteria by which the alternate sites are selected.

Mr. Michael N. Scarfone, Executive Director
Hawaii Community Development Authority
April 30, 1993
Page 2

3. The Final EIS should also discuss alternative designs with respect to our comments of October 2, 1992 which mentioned the use of overhangs, eyebrows and lanais as a preferred design alternative in creating energy efficient buildings.

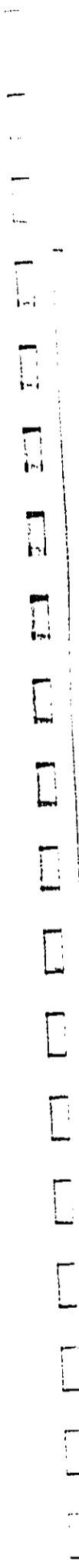
Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Tim Hata of our staff at 527-6070.

Sincerely,

Robin Foster
ROBIN FOSTER
Chief Planning Officer

RF:js

cc: Housing Finance and Development Corporation
Attn: Al Ahana
Office of Environmental Quality Control
Attn: Brian J. J. Choy
Wilson Okamoto and Associates, Inc.
Attn: Earl Matsukawa





HAWAIIAN COMMUNITY DEVELOPMENT AND PLANNING



KAWAII
Maui, Hawaii, Kauai, Oahu, Molokai

John D. Walker
Commissioner

Gary Caulfield
Assistant Commissioner

Michael N. Scarfone
Assistant Commissioner

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Robin Foster
Chief Planning Officer
Planning Department
City & County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Foster:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)

Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of April 30, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. As in the Draft EIS, the Final EIS will include a chapter on "Relationship to Plans and Policies". Including a discussion of the City and County's General and Development Plans and associated zoning in this chapter would not be appropriate since they are not applicable to the project site. The proposed project site is located within the Kakaako Community Development District and is, instead subject to provisions set forth in the State's Mauka Area Plan and Rules as established by the Hawaii Community Development Authority pursuant to Section 206-E, Hawaii Revised Statutes. Discussion of the latter will be included in the aforementioned chapter of the Final EIS as required under Section 11-200-17 (h), Hawaii Administrative Rules, State Department of Health.

The potential visual impact of the proposed project on the surrounding neighborhood with respect to the provisions of the Mauka Area Rules is discussed in both the Draft and Final EIS in Chapter V, Section B.7. Visual/Open Space.

2. With respect to alternative sites, the Draft EIS emphasizes that the proposed site is unique in its

The Honorable Robin Foster
Page Two
May 26, 1993

ability to address multiple community-based housing, education and recreation needs. High land acquisition costs already limit the range of feasible alternative sites for affordable and faculty housing to available state- and University-owned land.

The highly constrained situation with respect to affordable housing is discussed in Chapter V, Section C. Impact on the Supply of Affordable Housing, and in the Social Impact Study (Appendix E). The site is one of only six state-owned sites within the urban core determined to be suitable for development of moderate to high density affordable housing projects. Given the crucial need for housing, particularly in the urban core, each of these sites presents an important opportunity that must be seriously pursued. It is not an either/or proposition.

The situation with respect to faculty housing is discussed in Chapter V, Section D. Impact on the Supply of Faculty Housing Units, and in the Social Impact Study (Appendix E). In implementing the Hawaii Faculty Housing Assistance Master Plan, the University of Hawaii has identified only three available areas, two in the urban core: the proposed site and another in Manoa near Noelani Elementary School. Plans are proceeding for the development of faculty housing at both locations. The third yet-to-be-identified site is in West Oahu and would be developed in the future in conjunction with the proposed second campus in Kapolei.

In addition to accommodating both affordable and faculty housing, the proposed project site will create a new park/open space at the corner of Pensacola Street and Kapiolani Boulevard. It will also accommodate most of the existing ETO functions and will retain the existing Building 857, enabling additional space to be made available for use by the Department of Education.

Given the foregoing, we do not believe that the alternate site assessment methodology you proposed

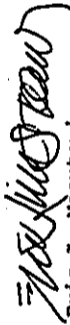
The Honorable Robin Foster
Page Three
May 26, 1993

would be practical or in order. Moreover, we note that such an assessment is not required under the provisions of Chapter 343, Hawaii Revised Statutes or the State's EIS rules.

3. Thank you for your recommendations on potential energy-saving design features for the project. We will forward them to our project designers for additional consideration.

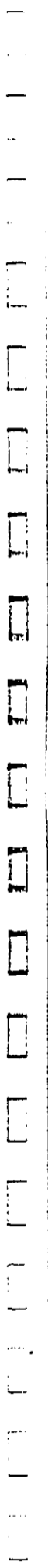
Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, NOA



POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
881 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111

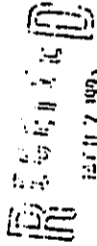


FRANK F. FASI
MAYOR

MICHAEL S. NAKAMURA
CHIEF
HAROLD M. KAWASAKI
DEPUTY CHIEF

OUR REFERENCE BS-LX

May 6, 1993



WILSON OKAMOTO & ASSOCIATES, INC.

Mr. Eric J. Masutomi
Director of Planning
Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

This is in response to your letter of March 29, 1993 regarding the draft environmental impact statement for the Hale Kewalo Rental Housing Mixed-Use Development.

We have no comments beyond those in our letter of September 14, 1993, which is reproduced in the draft EIS.

Thank you for the opportunity to review this document.

Sincerely,

MICHAEL S. NAKAMURA
Chief of Police

Eugene Uehura

By
EUGENE UEHURA
Assistant Chief of Police
Administrative Bureau

cc: Housing Finance and
Development Corporation
Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.



John D. Wahee
Commissioner

Cary Caulfield
Deputy Commissioner

Michael N. Scanlon
Assistant Commissioner

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 567-2070
Facsimile
(808) 567-2611

Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Michael Nakamura
Police Chief
Police Department
City & County of Honolulu
801 South Beretania Street
Honolulu, HI 96814

Dear Mr. Nakamura:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 6, 1993, indicating that you have no further comments pertaining to the Draft EIS. Your earlier letter of September 14, 1993 and our response to that letter will again be reproduced in the forthcoming Final EIS, as will your recent letter and this response. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HOA



MAIKI/LOWER PUNCHBOWL/TANTALUS NEIGHBORHOOD BOARD NO. 10
 410 NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

May 21, 1993

Office of Environmental Quality Control
 Central Pacific Plaza
 220 South King Street, Suite 400
 Honolulu, HI 96813

Dear Sir:

Subject: Hale Kewalo Rental Mixed Use Development DEIS

The Maiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10 wishes to comment on the following concerns in regard to Hale Kewalo DEIS.

Impacts on Honolulu Public Schools
 Your discussion about the impacts on the neighboring school system was inadequate in the DEIS. Omitted from the DEIS was any mention of the DOE's needs to have two portable classrooms, which are to be built this year at the Kaahumanu Elementary School, and eight planned classrooms for a new K-2 school in the Paea Superblock Development. The DOE might have to fund this new school building to accommodate increased enrollment in Honolulu which is not reflected in the DEIS statistics.

Noise Impacts
 DEIS did not discuss the noise between resident housing and school facilities. Iolani School had sound proofed its new gym to avoid disturbances to its neighbors. Kamaulua School also has trouble with its neighbors regarding noise.

Apartment Types
 No comments can be given on the apartment types because there is no breakdown on them. A breakdown should be placed in the DEIS for our evaluation.

Thank you for your consideration.

Sincerely,

 John Steelquist, Chair

cc: Hawaii Community Development Authority
 Willson, Keamoto and Associates
 Councilmember Andy Mirikitani
 Senator Carol Fukunaga
 Representative Rod Tam
 Representative Jim Shon



City of Honolulu, Hawaii, established 1907



John D. Wilcox
 Chairman

Cory Caulfield
 Chairman

Michael N. Sorfene
 Chairman

67 Ala Moana Boulevard
 Suite 201
 Honolulu, Hawaii
 96813
 Telephone:
 (808) 535-3000
 Facsimile:
 (808) 535-3011

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. John Steelquist
 Chair
 Maiki/Lower Punchbowl/Tantalus
 Neighborhood Board No. 10
 c/o Neighborhood Commission
 City Hall, Room 400
 Honolulu, HI 96813

Dear Mr. Steelquist:

Re: Hale Kewalo Rental Housing Mixed-Use
 Development
 Draft Environmental Impact Statement
 (Draft EIS)
 Tax Map Key: 2-3-09: 1
 Honolulu, Oahu, Hawaii

Thank you for your letter of May 21, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Impacts on Honolulu Public Schools

Section 4.5.3 of the Social Impact Assessment (Appendix E) provides a complete discussion of the impacts of our project on nearby schools based on information provided by the DOE. The potential additions to current capacity that you describe are being planned/proposed without regard to the Hale Kewalo project.

Noise Impacts

The Draft EIS discusses the compatibility of residential and school land uses on Page V-10. Addressed in this section is the potential for residents to be affected by noise generated at the high school. The Social Impact Assessment (Appendix E) examines this issue in further detail in Section 4.4.1 (page 42) and in Section 5.3.2 (page 61).


Mr. John Steelquist
Page Two
May 26, 1993

Apartment Types

The breakdown of apartment types was only tentative at the time that the Draft EIS was prepared and, therefore, was not included. With respect to the need for such detailed information, Section 11-200-17 (e) (Administrative Rules, Department of Health) states that the project description in the Draft EIS "need not supply extensive detail beyond that for evaluation and review of the environmental impact." The available project description was deemed sufficient to assess environmental impacts of the Hale Kewalo project. Your letter did not specify which environmental impacts may have been omitted from the EIS due to the unavailability of information.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

May 22, 1993

Mr. Eric J. Masutomi
Hawaii Community Development Authority
The State of Hawaii
677 AlaMoana Boulevard, Suit 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

SUBJECT: Hale Kewalo Rental Housing Mixed-Use Development
Draft Environmental Impact Statement

Thank you for this opportunity to comment on the Draft Environmental Impact Statement. In September, 1992 I commented on the archaeological assessment of the Draft Environmental Impact Statement report. I was concerned with the possible impact on the National Register site of McKinley High School (50-80-14-9926). You have included the finding of the State Historic Preservation Division of "no effect" in the Draft EIS. I am concerned with four issues that did not receive adequate response in the Draft EA or that were brought up in the Draft EIS.

1. Specific local history of the Kapiolani project site.
2. Realization of vibration effect on structures in the project area.
3. Development of a "high-rise character" of the area.
4. Probable impact on an historic structure (caretaker's cottage) not evaluated in the EA archaeological assessment.

Local History: You have documented probable land use by the native Hawaiians in the project site area up to the last part of the 19th century. You have documented the use in the 1940's of the project site for the Kapiolani Technical School. There is no information concerning the forty or so years between the two uses. Information concerning this time period probably would not be available in subsurface testing. However, information can be developed through the use of local informants. In summary, the archaeological assessment provided in the EA and included in the EIS without change offered only regional information. The final EIS should include this local history developed from local informants.

Effect of Vibrations: I have two concerns in this area. First, you have conceded the possible impact on the historic structures with your intention to monitor the vibrations. Secondly, you have provided "expert" analyses that project probable effect on a nearby structure and "very low" effect on the historic properties.

Monitoring: You have stated that the pile-driving and

Mr. Eric J. Masutomi
Page 2
May 22, 1993

predrilling will be monitored so that possible effects can be detected and operations can be modified. This seems to me to be a contingent plan that is required by state and federal regulations when there will be an impact on a historic property. A "no effect" by the project on the historic properties means that no monitoring is necessary. I recommend that SHPD or qualified archaeologists or architects are involved with this monitoring

Vibration Effects: The analysis by Y. Ebisu & Associates in Appendix D finds that the historic structures are in the impact area and that the caretaker's Cottage will be impacted. The analysis concludes that the risks of structural damage will be "very low" (Appendix D, page 4). In the EIS text, the findings have been reworded to "extremely low" (V-2 and V-4). I don't consider the two adverbs synonymous. I don't know what the difference means in terms of possible effect by vibration and I don't know why you chose to use "extremely" when the report said "very."

High-Rise Character: I have two concerns with this issue. The first is the assumption of a need for a high-rise character for this area and the second is the effect on the historic property by the criterion of "visual impingement."

High-rise character: I see no reason why this area needs a high-rise character as opposed to a low-rise character (V-7). In this sense, the issue is a social one; there is no reason to assume that a "high-rise character" is needed or will be accepted. This issue was not addressed in "Social Impact Assessment."

Visual Impingement: Although SHPD has declared "no effect" by the project on the "historic character," it did not declare "no effect" on the historic property. McKinley High School as an historic property was eligible for the National Register because of architectural and educational significance. It was not nominated because of a "historic character" as referenced in the letter from SHPD (September 18, 1992). The project will have an adverse effect on the historic property because of proximity and the height of the proposed towers. This encroachment is "visual impingement." The Advisory Council on Historic Preservation has been notified concerning the possible adverse effect on McKinley High School and the challenge of the determination of "no effect" by the State Historic Preservation Division.

Caretaker's Cottage: The archaeological review in the Draft EA and Draft EIS does not mention the caretaker's cottage. The vibration effect on the cottage will be significant. According



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HAWAII COMMUNITY
DEVELOPMENT
AUTHORITY

May 26, 1993



HAWAIIAN CULTURAL RESOURCES AGENCY



KAKA'IKO
Historic Hawaiian Cultural Resources

John D. Walker
Coordinator

Caro Crawford
Coordinator

Michael N. Scarfone
Executive Director

67 Ala Moana Blvd. and
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 557-2070
Facsimile
(808) 557-2413

Mr. Eric J. Masutomi
Page 3
May 22, 1993

to the EIS:

The primary concern centers on the caretaker's cottage which is not a historic building, but is a fairly old wooden structure adjacent to the project site (V-2).

I didn't find evidence for the above evaluation.

In summary, the project will have an adverse effect on the historic property by visual impingement and by structural damage through vibration effects. If the undertaking proceeds, a contingency plan for the preservation of the property needs to be developed with the State Historic Preservation Division. Thank you for the opportunity to comment on the Draft EIS.

Sincerely,

Rory Gay
Rory Gay
Consultant, Cultural Resources Inventory

Mr. Rory Gay
Cultural Resources Inventory
P.O. Box 8159
Woodland, CA 95695

Dear Mr. Gay:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 22, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. **Local History:** We disagree with your comment that the probable land uses between the latter part of the 19th century to the 1940s are not documented in the EIS. Specifically, we refer you to pages 16 through 24 of the archaeological assessment by Cultural Surveys Hawaii (Appendix B). Included in this portion of the assessment are discussions, maps and photographs specifically addressing the 40-year period you refer to.

2. **Vibration:** Seismographic monitoring of test pile driving is intended to determine if measures such as pre-drilling are necessary to reduce vibrational impacts. The responsibility for not damaging historic structures, or any other structure, during construction rests with the construction contractor as a liability concern. The most recent letter from the State Historic Preservation Division (SHPD) dated May 12, 1993 and included in the Final EIS, acknowledges that test monitoring will be conducted to determine potential impacts from pile-driving on historic structures comprising the McKinley High School campus and that appropriate construction techniques will be used to ensure that there is "no effect" to these structures.

The use of the term "extremely low" was not intentionally substituted for "very low" to suggest

Mr. Rory Gay
Page Two
May 26, 1993

a lesser impact. We will revise the Final EIS text to be consistent with the Y. Ebisu & Associates report (Appendix D).

3. High Rise Character: The high-rise character described on page V-7 of the Draft EIS refers to the evolving aesthetic character of the area in the vicinity of the project site. This character is established by the HCDA Mauka Area Plan and Rules which designate the area for high-rise development. The proposed project conforms with the Plan and Rules as opposed to establishing them. Thus, the high-rise character of the area is not an impact of the proposed project.

Visual Impact: The SHPD has assured us that in making its earlier statement, it had no intention of differentiating between effects on "historic character" and "historic property," and that its "no effect" determination did include consideration of any "visual impingement" on the architectural and educational significance of site 9926. Their most recent comment dated May 12, 1993 and included in the Final EIS states that "the DEIS correctly identifies potential adverse effects of the project on historic sites, including the McKinley High School Campus..." This statement supports the adequacy of the EIS in disclosing project impacts.

4. The caretaker's cottage was never identified as being a historically significant structure. In nominating the McKinley High School Campus to the National Register of Historic Places, the Department of Land and Natural Resources only included buildings deemed to be historically significant. The caretaker's cottage was not among these. The discussion pertaining to potential impacts of vibration from pile-driving on the caretaker's cottage is contained in the letter-report from Y. Ebisu & Associates Inc. dated August 6, 1992 (Appendix D).

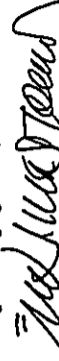
The SHPD will receive a report of the subsurface archaeological inventory survey which is to be conducted, and will participate in the formulation of a mitigation plan if significant historic sites are identified. To

Mr. Rory Gay
Page Three
May 26, 1993

date, the SHPD has not requested a contingency plan for protecting historic property.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



McKinley Student Council

109 SOUTH KING STREET • HONOLULU, HAWAII 96814 • TELEPHONE 534-1041

May 21, 1993

Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
ATTN: Eric J. Matsutomi

RECEIVED
MAY 21 1993

WILSON OKAMOTO & ASSOC., INC.

Dear Mr. Matsutomi,

On behalf of McKinley High School, I would first like to thank you for providing me with a copy of the Hale Kewalo Rental Housing Mixed-Use Development Draft Environmental Impact Statement. I would now like to comment on a few items that still lack clarity to my fellow students and me.

From the letter in which you had responded to my concerns, which is part of the DEIS consultation, you noted that the noise generated from construction will affect the school and air conditioning will be needed in order to reduce noise so that windows can be closed. Although this will help, how can you be certain that students in all of the buildings including Academic Core, shops, P.E. facilities, gym, portables, and buildings to which students have already been relocated to because of the deterioration of the Administration Building will not be affected? For one thing, relocated classes are now being held in Hirata Hall, which is already air conditioned. But because of the way the building was constructed (with wooden loovers), noise will not only be heard but could be amplified.

A second statement made also calls for better defining. In number two of your responses, I would like to know where construction vehicles will go when the project site's parking area will be used "to the extent possible" and to capacity?

As to the reference to utilities, I think that you need to be aware that school doesn't end when the last bell rings. Adult education classes, athletic and other extra-curricular activities, as well as usage by outside groups can last until at least 10:00 p.m. nightly for seven days a week. How will you avoid interruptions at these times? Are these times going to be considered "low demand hours"?

In number five, you admit that "residential development in the vicinity of McKinley High School will inevitably occur as the Kakaako area undergoes redevelopment." By this, I take it that Hale Kewalo is supposed to be only a small part of the total impact from the area. But why should you risk setting up such a direct conflict with the school? Is this good planning? True, the other buildings to be put up will also face the same commotions that will take place at McKinley; however, at least they will not be placed at such a close proximity. In the same sense, how much right does McKinley have to complain? Who's to tell all of those professors who need to take a break during their stressful lives not to just go downstairs and out back to run around the track? I've noticed that there is a reminder that even if Hale Kewalo falls through, UH will still go ahead and build housing on the site anyway. Is this reason enough to not fully study the impact that will be on us-the students? How does all of this fit under HCDA's guidelines providing for schools in Kakaako?

Upon reviewing the DEIS, we also have several questions.

1) In Appendix C (Traffic Study) of the DEIS, there were two mitigation measures and three other potential improvements listed in the "Conclusions and Recommendations" section on page 5-1. I have looked over the intersection summaries and have noticed that there is one important situation that has not been addressed. As mentioned in the DEIS, the making of left turns onto Piliolani St. from Kapiolani Blvd. is presently prohibited during the morning peak hours. Being that 1) Pensacola St. is one way going west as an on-ramp for the freeway, and 2) there are streets connecting Pensacola and Piliolani in the parallel-to-Kapiolani Blvd.-position, shouldn't it be considered that traffic problems will exist because of the need for the potential professors to cross over to Piliolani in order to get to the freeway to get to UH?

2) Also, in Appendix C, it is recommended that on-street parking should be removed from the east-side of Pensacola St. along the project frontage to provide a deceleration lane for traffic to turn into the driveway. A second measure suggested is to remove on-street parking on a mid-block section along the kokohau side of Pensacola St. in the block mauka of Kamalii St. Surely the elimination of parking doesn't make it that the cars will disappear too! Where will these cars go? Won't residents in the area be affected?

Therefore, I thank you for taking the time to take my comments to heart. But I'm deeply sorry that the occurrence with the forum has caused one truly great loss-the opportunity for us students to have learned the democratic process the right way.

A survey of MHS students indicates that 98% of them do not want UH faculty housing to be built on educational land (KCC/Pensacola site).

The McKinley High School Student Council reaffirms its position against the Hale Kewalo project on the former site of KCC at Pensacola. We find the answers in the DEIS inadequate and hope that our questions will be studied completely.

Sincerely,
Vanessa Lee

Vanessa Lee
Student Council 1st Vice President

cc: Attn: Al Ahana
Housing Finance and Development Corporation
Attn: Brian J.J. Choy
Office of Environmental Quality Control
Attn: Earl Matsukawa
Wilson Okamoto & Associates, Inc.

In Appendix E (Social Impact Study) on page 62 addressing Construction Impacts, it says that "While the temporary disruption of parking will negatively impact those who use the area now, the long-term addition of parking spaces is positive." Does this mean that there will be parking spaces available to the public in Hale Kewalo residential parking? Street parking was free; to insure no impact, will these Hale Kewalo spaces be free too?

3) I would also like to draw attention to the need for UH faculty housing. On page 34 of Appendix E, it is stated that one-fourth of UH faculty resignations were due to lack of available affordable housing. Although I may not understand the greatness of this retention rate, I do know that recently, the Honolulu Star-Bulletin had an article on UH faculty retention and the factors involved in resignations. One prominent factor mentioned for currently, housing is the most important factor? Did you consider this recent data in the EIS?

A factor that was not brought up in the DEIS was the effect of two buildings of the height of Hale Kewalo could have on school grounds. By the buildings, I mean the exterior glass and its reflection. With the sun setting in the West and with no other obstructions between McKinley and the horizon, won't the athletic fields of McKinley's campus be burned to death? I have also heard stories about and personally experienced distraction from glass reflection. How will athletic activities be affected, being the baseball field dug out will be facing the buildings and the tennis courts right next door to it? As captain of McKinley's tennis team, I know that half of our matches are in the afternoon. I've also seen the glare that you can get when playing at Ala Moana Tennis Courts and facing the Naupu Towers. How will you prevent such glare from occurring at McKinley?

Although this is not tied in with the DEIS, I would like to tell you how disappointed the students of McKinley High School were because HCDA made no effort to attend our forum. All many students were asking for was to have a chance to voice their own concerns. We appreciate the UH Board of Regents' and VP Horii's effort to enlighten us, but getting answers from the main source would have eased any confusion still existing. Furthermore, I think that it was wrong for HCDA, through the use of the press, to give the public the incorrect perception that it was well represented at the forum. What I understood was that it was important that everyone in the department be on-call for 24 hours at the legislature as relayed to us by Laurie Hoo; how did the press manage to learn the same information that we wanted? We also know that other cabinet members were not on-call to the legislature because we asked.



HAWAII COMMUNITY
DEVELOPMENT AUTHORITY



KAKAWAO
Hawaii's Community Center For The Sun

John D. Waite
Commissioner

Gary Couglefield
Commissioner

Michael N. Scarfone
Executive Director

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Ms. Vanessa Lee
MHS SC 1st Vice President
President-Elect
McKinley High School
1039 South King Street
Honolulu, HI 96814

Dear Ms. Lee:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)

Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 21, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments: starting first with items of clarification from our previous response letter, followed by your Draft EIS questions:

a. As explained in the Draft EIS and in our earlier response to you, pile driving noise could exceed the Department of Education (DOE) criterion for construction noise in naturally ventilated classrooms within 1,000 feet of the pile driver. Air conditioning would allow windows to be closed to reduce noise levels in these classrooms. Within 250 feet of the pile driver, which includes the PE and shop buildings, the DOE criterion will probably be exceeded even if the rooms are air conditioned. We did not say that any of these areas will be unaffected by noise. With respect to the type of louvers, glass louvers attenuate noise better than wooden louvers but neither are capable of amplifying noise.

b. While the project site has sufficient capacity to accommodate parking for all construction-related vehicles throughout the construction period. We cannot entirely discount the possibility that during some phases of construction, such vehicles may have to be parked off-site, on streets in the area.

Ms. Vanessa Lee
Page Two
May 26, 1993

c. Utility connections are scheduled based on the type of use affected. If utilities at the high school need to be interrupted, it will be after all evening classes are completed. It is quite common to schedule interruption of service after midnight. All affected utility consumers are notified in advance of any interruptions.

d. The EIS is a disclosure document that provides information upon which decision makers will judge whether or not a project should be implemented; it is not aimed at judging the soundness of a planning decision.

e. The Draft EIS and the Social Impact Assessment (Appendix E) discuss the land use compatibility of residences and schools as well as the issue of school-generated noise complaints.

f. It is assumed that McKinley High School will continue to exercise its authority to establish and enforce policies on general public use of its facilities, particularly if it interferes with school functions.

g. If the University pursues a faculty-only housing project at this location, it will also be subject to review pursuant to Chapter 343, Hawaii Revised Statutes (Hawaii EIS Law). Such a project would be subject to the HCDA's Mauka Area Rules and will require a Planned Development permit from the HCDA.

h. The HCDA's Mauka Area Plan identifies the potential of the site to be shared for elementary school use. At the same time, it does not preclude its use for other public purposes.

Regarding your Draft EIS comments and questions, we respond as follows:

1. For the morning peak traffic assessment, the traffic study is based on the shortest route available from Hale Kewalo to the H-1 freeway. This route goes makai on Pensacola Street, across Kapiolani Boulevard, left on Waimanu Street, then left on Piikoi Street to the freeway.

2. The proposed project will exceed existing HCDA requirements for off-street parking. This includes 50 stalls of parking which will be made available for use by the DOE, potentially by McKinley High School. This far exceeds the 13 to 16 spaces of on-street parking that will be lost. It should also be noted that, based on our traffic engineer's informal observations, those who park on Pensacola Street apparently have destinations makai of Kapiolani Boulevard. To assist in addressing parking requirements in the Kakaako District, the HCDA is planning to build a multi-story parking garage at the corner of Pensacola and Waimanu Streets, where a 140-stall public parking lot is currently located. Parking demands in the general area will be further addressed by the planned expansion of the municipal parking garage at Neal Blaisdell Center where an additional 400-600 stalls will be built.

3. We acknowledge that there are several factors related to faculty retention. The matter at hand, however, is the relationship between housing and faculty retention. In the 1991 study of UH faculty housing needs, housing was found to be a major consideration in attracting and retaining qualified faculty at UH. As discussed on page 34 of the Social Impact Assessment (Appendix E), it is typically difficult to attract qualified faculty in higher education facilities because colleges and universities need to compete with government and industry which offer higher salaries. Colleges and universities located in a high-cost housing environment such as Hawaii are at a further disadvantage in recruiting qualified personnel. Hale Kewalo is being proposed as only one part of a comprehensive housing assistance program.

Plans for Hale Kewalo call for the use of tinted glass, not reflective glass of the type used in the Nauru Towers. This will minimize glare problems.

In closing, allow us again to express our regret for having been unable to attend your student forum. We do, at the same time, take strong exception to some of the comments you have made and conclusions you have drawn in this regard. First, your assertion that HCDA used the press to give the public the perception that HCDA attended the meeting is incorrect. HCDA was contacted by phone by Honolulu Advertiser reporter Lorna Lim on the evening of April 23, at which time she was apprised that HCDA was not present at the forum. Ms. Lim indicated that she was aware of this, noting that the "panel" in fact only included representatives of the University of Hawaii. Thus, the Advertiser statement that "high ranking officials from the University of Hawaii and state housing agencies went to McKinley on Friday..." was an error on Ms. Lim's part and in no way should be attributed to HCDA. Second, when our agency was invited to attend the forum, you were informed that we could not make a firm commitment to participate because key HCDA staff would be on 24-hour call during that critical legislative period when the agency's budget and legislation were scheduled to be finalized. We did not indicate that we would be on-call "at the Legislature." Furthermore, the fact that other "cabinet members" may not have found themselves in a similar situation has no bearing on the matter; Legislative procedures and protocols vary from agency to agency. Lastly, and most important, we are disappointed that you have chosen to overlook the fact that, given the potential conflict in schedule, HCDA did ask that the forum be rescheduled to any date after May 3 - the last day of the legislative session - at which time, as we stated, we would have been more than willing to attend. We did not believe this to be an unreasonable request since, as we understand, other agencies involved in the project were also unable to participate in the meeting due to prior commitments.

Ms. Vanessa Lee
Page Five
May 26, 1993

The above notwithstanding, we sincerely appreciate the involvement of the McKinley High School Student Council in the consultation phase of the environmental review process. We commend you for your active interest in this matter and, again, acknowledge your continued opposition to the proposed project. Your letter, together with this response, will be included in the Final EIS.

Very truly yours,


Eric J. Masutomi
Director of Planning

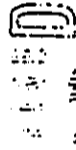
cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA



McKinley High School

1009 SOUTH KING STREET • HONOLULU, HAWAII 96814 • TELEPHONE 536-1041

CHARLES T. TOGUCHI
Superintendent



May 20, 1993

21 1993

WILSON BRAWLEY & ASSOCIATES, INC.

Hawaii Community Development Authority
The State of Hawaii
577 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
Attention: Eric J. Masutomi

Dear Mr. Masutomi:

Thank you for the opportunity to respond to the draft Environmental Impact Statement. We appreciate the effort that was given to respond to our questions and concerns about the Hale Kewalo Rental Housing Mixed-Use Development Tax Map Key 2-3-09:1 Environmental Impact Statement Preparation Notice.

We will first respond to your letter of March 29, 1993. Where indicated, we are referring to your item numbers.

In item #1, our concerns were about the structures on the campus. With regard to our concern for the historic structures on the campus of McKinley High School, we have two further questions. When was the assessment of the structures made? Did the assessment take into consideration the current condition of Building A and the engineering study made on that building?

What was the definition of "historic" used in reference to the custodial cottage that is makai of the main parking lot on the Pensacola entrance of McKinley High School? We note also that in your preliminary site plans, the cottage is missing from the drawings. Our custodian lives there? Why have you eliminated it from the plans?

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

In item #2, your attempts to negate the view problem of the erection of the towers on the panoramic view of historic McKinley High School do not satisfy our concerns that the view will be compromised more by the Hale Kewalo Project than by any other project in the area. How can you determine that the historic view will not be compromised because you have the setbacks and so-called view corridors? Given the character and nature of the entire historic block bounded by McKinley and NBC, how can the State Historic Preservation Office declare "no effect"? By what means was that determined? By what standard? Was the public asked? Should they have been?

In item #3, since you state that you used prior studies without designating the year of the study, how do you know that the conditions have not drastically changed? What study was made to determine how often stable wind does now exist? Why is there a "may not be related" clause in the concern about the air quality which exists and we know will further deteriorate with the advent of the many occupants and the cars they drive if the Hale Kewalo project is built adjacent to McKinley? Are not the health and safety of the 2000+ students and the staff of over 140 at McKinley sufficient cause for an in-depth current study of the problem?

With regard to the traffic study, we note that it was done in 1991. All of us know that the traffic has continued to increase in this area and we want to know why a current study was not done? You state that because the increase in traffic at King and Pensacola Streets would be negligible, you did not examine the intersection. One area of the Hale Kewalo project has as its destination, one area of our city, namely the University of Hawaii at Manoa. How then can you say that it is negligible when the egress from Manoa via the freeway is on Pensacola Street? Are you stating that the University of Hawaii faculty who would reside in the Hale Kewalo project would not use the freeway to and from work? Where is a traffic study to validate your claims in light of the concentrated "work force" in the faculty tower of Hale Kewalo? To get accurate data, a study should be conducted when both the University of Hawaii and McKinley High School are in regular sessions where optimum use of the roadways is utilized. Will such a study be done?

Where is a study of the cumulative effect of all of the construction including the Hale Kewalo project which is in process and proposed for this area? Isn't this type of cumulative study necessary to see a total effect of any project on traffic and other environmental concerns?

Item #4 is perfectly clear to those of us here at McKinley. We have seen and continue to see the use of our campus as a cross-through by persons going to and from work from both the Kapiolani side and the King Street entrance. Furthermore, we well remember that when KCC was still at the Pensacola campus, the students, faculty and guests would always park in our parking lot. What plans will the ETO and Hale Kewalo project have to prevent their guests, tenants and users of services provided at ETO from parking at McKinley?

Item #5 regards our facilities. There have been other campuses affected by the development of on-campus and nearby housing. One campus had its #1 track lane worn out by the community of daily joggers. We note that your project has recreational facilities but two that are prominently missing are two which are readily available at McKinley's athletic facility---namely our worn-out track and our already over-burdened tennis courts. One would be naive to think that persons living in the Hale Kewalo project would opt to go several blocks away for a "run" or a game of tennis when it is available right out of their back door. It is this concern that bothers us. We believe this is not considered in the EIS. Will you address the issue?

The draft EIS is a good start toward answering genuine concerns of educators and taxpayers, however, we continue to believe that the adverse affects of the project mentioned by all persons in the draft EIS are far more detrimental than the need for housing on that particular piece of land. The land must be reserved for education. Where will the students in the area go to school? The draft acknowledges the already overcrowded conditions and the need for elementary schools. If you acknowledge it, why then do you take the land originally intended for schools to use for housing?

We look forward to your response. Although you have secured government bond funding through the 1993 Legislative appropriations, we know that we, as taxpayers, will be contributing to the costs of the project both directly and indirectly when new land for education has to be purchased at astronomical prices. As educators, we know that this project has not been thoroughly researched or discussed in a public forum. Why ask then, why do we teach the democratic participatory process if our government will not use it?

On behalf of our colleagues at McKinley High School, we thank you for continuing to address these concerns. We ask you once again to relocate the Hale Kewalo project away from this historic institution of learning.

Sincerely,
Teachers at McKinley High School

Vickie Dempsey
Richard J. Fair
Langston Brown

Allen Tolgemi
Tom Seom

Clyde Ching
Debra
Pam Lee

Theresa Bauer

Mary Lambert
Lynette Tom

Barbara Rogers
Allen L. Fromm

Maria Groot
Eric K. K. K.

John F. Felt

Grace Wilson

Susan Okumu

Shirley S. S. S.

Charles Dr. M. M.

Sylvia Chun

Jan 10 1978

Ann McFallen

Charles Lykes

James M. Johnson

Myra M. Johnson

Josephine F. Miller

Marie M. Felt

Edward Z. Lohle

Flaminio Lohle

Henry M. An

Off Sp

Alan S. Seligson

Susan H. Seligson

Doyle Seligson

Lee Minkham

Roy Lohle

Edward M. Lohle

James E. Lohle

Raymond M. Lohle

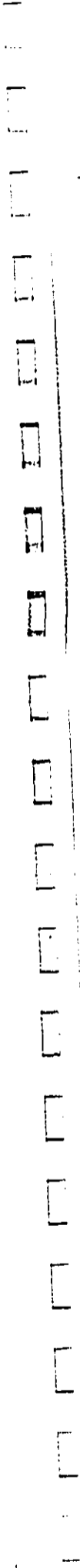
Richard H. Lohle

Margaret Lohle

cc: Housing Finance and Development Corporation
Attn: Al Ahana

Office of Environmental Quality Control
Attn: Brian J. J. Choy

Wilson Okamoto & Associates, Inc.
Attn: Earl Matsukawa





HAWAII DEPARTMENT OF TRANSPORTATION



KAKAIAKO
Kauai County, Hawaii

John D. Wallace
Commissioner

Guy Caulfield
Deputy

Michael N. Scarfone
Executive Director

Ref. No.: PL GEN 1.15b.2

May 26, 1993

MHS Teachers
McKinley High School
1039 South King Street
Honolulu, HI 96814

Dear Teachers:

Re: Hale Kewalo Rental Housing Mixed-Use
Development - Draft Environmental Impact
Statement (Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 20, 1993
commenting on the subject Draft EIS. We offer the
following responses in the respective order of your
comments:

1. Seismographic monitoring of the test piles has yet
to be conducted. The noise and vibration study
prepared in August 1992 is a prediction of
vibration impacts from pile-driving (Appendix D).
The study took into account the condition of
buildings on campus by using a low threshold factor
which is one step above the factor for ruins and
ancient monuments and two steps below the "no risk"
factor associated with average buildings. The
distance of the historic buildings from the nearest
pile-driver will keep the level of vibration within
the threshold level. These predictions will be
verified by seismographic monitoring when test
piles are driven.

The caretaker's cottage is not among the historic
buildings on the McKinley High School campus listed
on the State and National Register of Historic
Places. Also, the caretaker's cottage is not
within the project site, hence it is not shown on
the Proposed Development Site Plan in the Draft EIS
(Figure II).

2. You are apparently operating under a misconception
that the McKinley High School Campus in its
entirety, indeed the entire block, has been
determined to be historically significant. This is
not the case. The portion of McKinley High School
listed on the National and Hawaii Registers of
Historic Places, identified as Site 9926, is

MHS Teachers
Page Two
May 26, 1993

confined to the Quadrangle area, the Commercial
Building, the Home Economics Building, the Marion
McCarrell Scott Auditorium, the Senior Core
Building, and the Fred Wright Swimming Pool (Figure
II on the Draft EIS depicts the included area).
All other areas and structures do not enjoy such
distinction. It is within the foregoing context
that we previously indicated to you that the view
from King Street of the "historic McKinley campus"
(the central quadrangle and seven historic
structures collectively) would not be adversely
affected by the project. The State Historic
Preservation Division (SHPD) has affirmed this
finding in its determination that the Hale Kewalo
project will have "no effect" on Site 9926. In
assessing the visual impact of the project on the
historically significant portions of the high
school, it is our understanding that the SHPD
considered a number of factors, including the
location and intervening distance of the project
with respect to Site 9926, the relative heights of
the proposed towers, and the overall potential of
the project to impinge on the educational and
architectural significance of Site 9926. This
assessment was conducted by the SHPD as provided
for under Chapter 6E, Hawaii Revised Statutes. The
SHPD's determination of impacts of a proposed
project on a historic site is not subject to a
public hearing.

3. The two generally accepted computer models for
assessing traffic-generated air quality impacts are
the MOBILE4.1 and CALINE4. MOBILE4.1 calculates
vehicular emissions of carbon monoxide (CO) and
accounts for, among other factors, the mix of
vehicles in traffic where older cars tend to
generate more CO than newer cars with efficient
pollution control devices. CALINE4 is loaded with
traffic data, including the calculations of
MOBILE4.1 to predict pollutant concentrations along
roadways, considering such factors as delay times
(idling vehicles produce more CO since they are not
moving around and dispersing emissions),
meteorological conditions (wind-speed) and roadway
geometry (how close pedestrians are to the
roadway).

Because of the replacement of older vehicles with newer vehicles over time, even if traffic volumes remain the same, the models predict that emission rates will decrease significantly over time. Because traffic generated by the proposed Hale Kewalo project is proportionately small, in relation to the large volume of existing traffic, and the delay time will increase only slightly, it was anticipated that there would be negligible deterioration of air quality with respect to CO levels as a result of the project.

Wind velocity data is collected at various locations around Oahu, notably at airports. Historical data indicates that stable wind conditions (<1 meter/second) are rare. We know of no evidence suggesting that wind patterns on Oahu may be changing significantly over the decades that such data has been collected.

Based on comments received, we understand that the air quality problem you refer to is a localized problem in one of your buildings. Since the project's traffic impacts on air quality will be negligible, particularly because at the distance of the building from the roadway, there is no basis for suggesting that there will be a cumulative air quality impact within the building.

The traffic study was prepared in May 1992, although the traffic counts used as the baseline were from 1991. Contrary to your perception, historic traffic data on the Pensacola and Kapiolani during the morning and evening peak periods have been relatively stable over the past several years. Thus, the most recent traffic counts available were judged to adequately represent current conditions.

Our response that traffic generated by the Hale Kewalo project on the intersection of King and Pensacola will be negligible considers for use of the intersection by residents of Hale Kewalo during peak traffic hours. We stated that Hale Kewalo generated traffic would account for less than one percent of the existing peak hour traffic through this intersection, based on an estimate by the traffic engineer who prepared the traffic study.

Because this estimate is so low, it was deemed unnecessary to extend the formal traffic assessment to include this intersection. As discussed in the traffic study, cumulative increases in traffic as a result of known future developments were included in the assessment. The social impact assessment also considered cumulative impacts of development trends in the area. In general, the Kakaako area is changing toward a denser urban environment, as envisioned in the HCDA's Mauka Area Plan. It is within the context of this larger trend that the long-term impacts of the Hale Kewalo project are proportionately small.

4. As stated in our previous letter to you, the Hale Kewalo project will exceed the HCDA minimum standards for off-street parking. Beyond providing adequate parking, and possibly encouraging the police to enforce street parking restrictions, there is little that can be done to control individual actions. If non-school related parking at the McKinley High School campus is considered a problem, then measures should be taken by the school to address the problem.

5. In response to your concerns regarding potential use of McKinley's track by project residents, we will consider the addition of a running course, as the project's recreation facilities (Although, as an aside and at the risk of being unwittingly accused of denigrating the fine efforts of the Hawaii Farm Bureau, we do suspect that any wear on the existing track from limited, shared use by the public probably pales in comparison to that caused by the trampings of 150,000 people over a ten day period during annual Farm Fairs). With respect to McKinley's tennis courts, it is our understanding that the courts cannot be accessed or used by the public without a permit from the school. Hence, while a locational advantage may exist, it is unlikely that the facility would be available for use by project residents to any greater degree than any other member of the general public.

MHS Teachers
 Page Five
 May 26, 1993

In closing, your position regarding the benefits and impacts of the project is acknowledged. The question of where students from the Hale Kewalo project will attend school is discussed in the Draft EIS on page V-11 in the Long-term Impacts -- Social section. The remainder of your comments are not pertinent to the content of the Draft EIS.

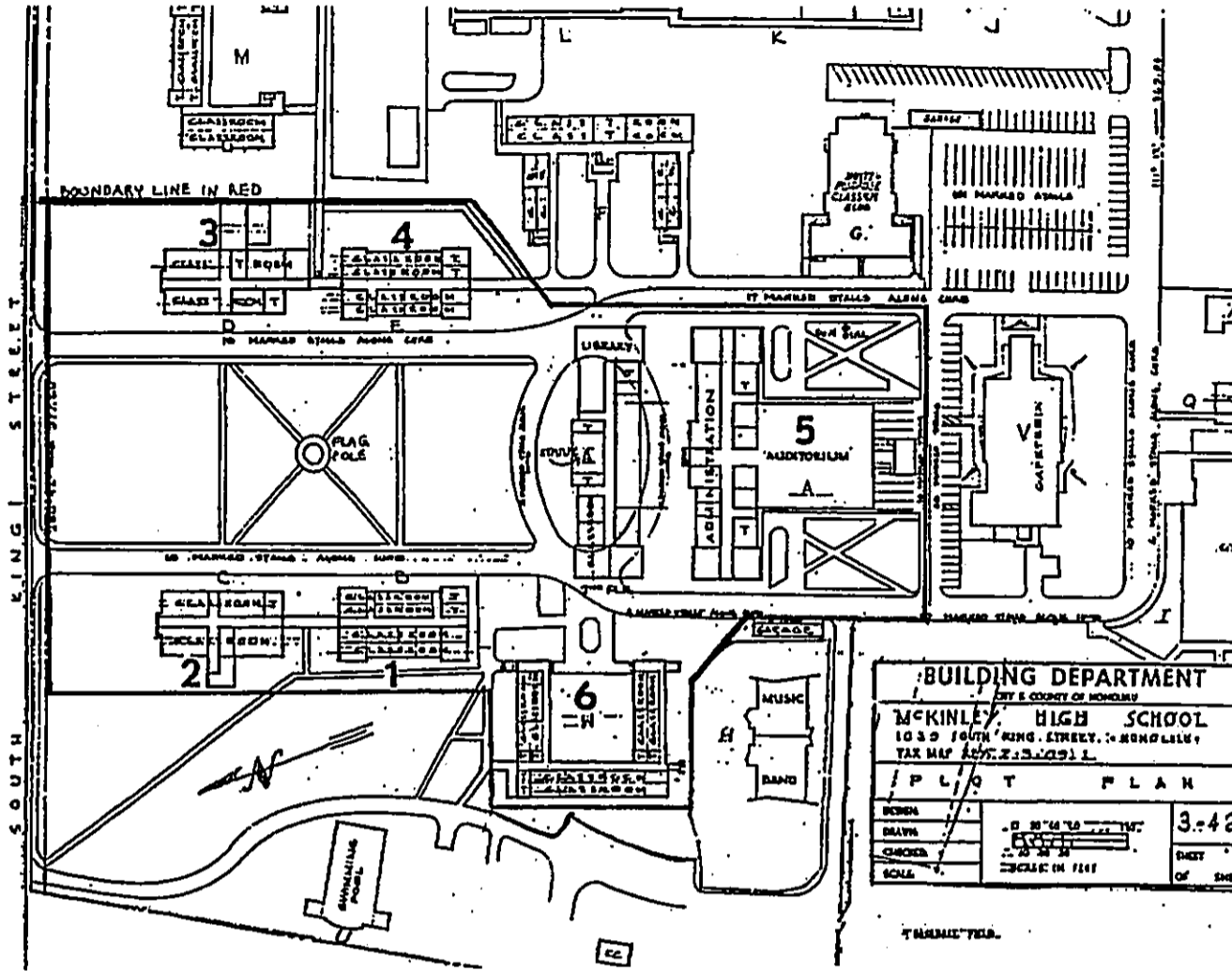
Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi
 Eric J. Masutomi
 Director of Planning

enc.

cc: Mr. Al Ahana, HFDC
 Mr. Earl Matsukawa, WOA



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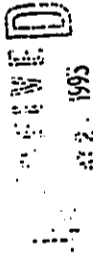
Eric J. Masutomi
 Eric J. Masutomi
 Director of Planning

enc.

cc: Mr. Al Ahana, HFDC
 Mr. Earl Matsukawa, WOA

May 20, 1993

Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
ATTN: Mr. Eric Masutomi



RECEIVED
MAY 20 1993
COMMUNITY DEVELOPMENT AUTHORITY

Dear Mr. Masutomi,

Subject: Hale Kewalo Rental Housing Development As Planned For
The Corner of Kapiolani Boulevard And Pensacola Street
Draft Environmental Impact Statement Concerns

At first we were happy to hear that the decision to circumvent the Environmental Impact Statement process was reconsidered making it unnecessary to proceed with our lawsuit or the administrative hearings previously scheduled. We had hoped that the same firm that authored the "Negative Declaration" dated October 1992 could objectively analyze the full spectrum of reasonable potential impacts in appropriate depth and with open objectivity in spite of having produced a written determination of Negative Declaration. After reading the Draft Environmental Impact Statement (DEIS), we are very concerned that the topics that follow in this letter will not be addressed in a comprehensive, overall, medium term, long term, cumulative, and objective way in the final report. We urge you, as the responsible planning agency for a major part of Honolulu, to insist that the EIS be an openly objective study of the impact on people, present and future, of constructing unforeseen and unplanned residential high-rise buildings. The land is specifically identified in HCDA's Mauka Area Plan as "Public" in the active instructional educational context; matching the rest of the block which is public in the context of Blaisdell Center or McKinley High School and Adult Community School, rather than the very narrow use of the site as University faculty housing and affordable rentals. Our concerns follow:

1. We had asked that consideration be given to alternative uses (short and long term) for the site what would result in the "highest and best use" of the site in the long term best interest of the public as a whole. We noted that this consideration is crucial since the proposed project would essentially preclude alternative active public uses on a highly central and very public activity oriented city block. It appears that this request was conveniently taken to mean that "every conceivable use" be considered as a means of avoiding the key issues. We hope that this not the case and ask specifically that the long term educational instructional potential of the site be addressed with regard to the specifically identified need (identified by the HCDA for just the Mauka Area alone) for five elementary schools in the Mauka Area plus adjacent affected areas. The same type of cumulative educational facility needs analysis should also occur for the intermediate level and high school levels. What is the cumulative impact of the

taking of active instructional land from the area? Why is the educational planning issue given such shallow "will discuss in the future" type analysis when the site that is being committed to non-instructional uses is the last readily identifiable site for educational expansion in the entire area? The Mauka Area Plan identifies two sites as possible schools, Pohukaina, which the HCDA as noted is no longer available, and the former KCC campus. The Plan does suggest that KCC should not be closed so that an elementary school can take its place. The Plan notes the next priority as elementary education and not faculty housing. How is it that the mere presence of the ETO component (proportionally a very small user of the site and an even smaller user of direct instructional space) allows other non-instructional uses to supersede the potential for elementary education (even if only a partial grade school, say K to second)? Why is the need for intermediate, high school, or adult education facilities entirely omitted? (The EIS for Pawaa noted that the schools of all levels in the area are essentially at capacity now. What are the forecasts by the HCDA and the DOE for 2020, and 2040. (These are all dates that are part of the typical economic life of the Project.) How does this forecast relate to neighborhood building capacity? While the Pawaa project takes no school sites, at least some discussion is made of educational facilities for the neighborhood. The Hale Kewalo DEIS does not analyze the impact of taking an instructional educational site in any overall or cumulative way and contains even less educational facilities discussion than does the Pawaa report. We are concerned about the appearance of bias and project advocacy for Hale Kewalo when the two reports (Hale Kewalo and Pawaa) are read side by side. Both reports are by the same firm.)

2. We had noted that the site is the logical choice for temporary classrooms while the McKinley Administration Building (Building A) is reconstructed. We understand that Building 857 is not able to house all users of Building A. Why demolish and/or move away buildings that could be temporarily used during construction and, at the same time, build new temporary classrooms? What are the cost consequences? What are the alternatives?

3. We had previously noted that with the anticipated population growth of Honolulu, the number and capacity of recreational facilities needs to be a serious alternate consideration since the site could also be used as a joint educational and recreational facility (for example, as in Aiea). The previous reply was that "the EIS is not intended to assess every conceivable use". Given the very public use nature of the rest of the block, to restrict the site to a limited use as faculty and affordable housing is much like building faculty high-rises in Ala Moana Park. Should not a distinction be made between general public and limited public uses? Should the open space recreational area next to Kapiolani be looked at from a use ability stand point? For example, is it big enough for a baseball game? Other sports? The important reasons for this study would be the possibility that some slight alteration of the site plan might make a big difference in the recreational suitability of the site plus the fact that the Mauka area

will not be providing the park and recreation space originally planned for. Should not also an analysis of the neighborhood recreational facilities be looked at since a clearly potential active recreation site will be severely restricted. At the same time, on a completely unplanned basis, additional living units will make demand for recreation even stronger?

4. Alternative sites for the affordable and faculty housing project is an important topic not adequately discussed nor omission explained in the reply dated March 29, 1993 contained in the DEIS. Alternatives should not be limited to the current area of control of the HCDA or only locations directly in central Honolulu. Land costs are lower in areas outside of central Honolulu and may be more in tune with the objectives of the "Second City" concept. Also the wisdom of building University faculty housing that is not next to any campus needs to be discussed objectively and appropriate faculty preferences queried. Will the proposed housing adequately meet its objectives relative to the alternative housing sites and alternative housing assistance plans? Construction near the site of the West Oahu Campus may also be appropriate. Any objective discussion should include the costs and impact of building additional parking at each of the schools where the University faculty will commute to. Should not the traffic studies also include the traffic flow to the major campuses affected, especially since the flow has the potential of being highly channeled relative to other buildings where the occupants work in many different areas?

5. Alternative plans that accomplish the same goals are also important. For example, existing living units could be purchased for the faculty (often at lower costs) rather than building new units. Rebuilding of existing University buildings to higher densities are also another possibility. Conversion of the faculty hotel on the Diamond Head Campus is also plausible. Also realistic is a housing allowance plan which could be tailored to be less costly than bond interest payments. How much housing allowance payment equates into an equivalent alternate cost to the construction proposed when the land opportunity cost is included? Faculty retention would probably be greater if they had an equity interest rather than just being tenants in a public housing project. We wonder if it would not be wise to find out the exact problem and magnitude of the problem in search of relief. Is university faculty compensation competitive? Is turnover in line with the national average? Will faculty housing so far from campus be a realistic choice or a white elephant? Are these not social impacts of the project? It was claimed in a March 29, 1993 reply that these concerns were addressed in the UH Housing Assistance Master Plan (1991). All the above are clear and real alternatives to the project. Why are they not discussed in the DEIS? The UH Plan was not designed to address social impacts. What are the social impacts of alternate plans? What are the changes that have occurred since 1991. The Plan contains many assumptions and limitations that could be obsolete. What is the basis for omitting real alternative plans of action along with discussion of the social impacts?

6. Input from the direct community should be analyzed. The categories should include (but not be limited to) people from adjacent areas, others who would lose the

openness and views of a public facilities block, students, parents, teachers, (presently at McKinley and at all the feeder schools), churches located in the area, and community groups and organizations who make use of the same city block and school grounds. In a reply dated March 29, 1993 it was noted that the range of concerns were addressed in the social impact assessment. We could not find such specific inputs from the community in the DEIS. Please explain how an objective social impact study can be made without such specific input or have included in the EIS.

7. Other examples of residential buildings and residences right next to active schools should be studied. It would be difficult to understand objectivity that did not analyze existing occurrences. In a reply dated March 29, 1993 it was noted that the social impact study examined such examples. Only one example was examined. There are several in Honolulu. Should not the DOE have been asked for other leads? The Royal Iolani and the Iolani Court Plaza occupants have the opportunity to air condition their units as proposed as a mitigation measure for the Hale Kewalo Project. Complaints apparently still occur abundantly. McKinley has an even broader based community use than does the Iolani School Campus. Why is this clear and direct social concern given only minimal attention?

8. We have expressed concern that full and open communication should occur with the Department of Education. The realistic alternatives to provide education to the students of the area are important to the study of impact. Why are they not included in the DEIS? What about the growth in areas beyond Kakaako? Growth in the adjacent areas impact the schools and other facilities in Kakaako. Direct instructional educational land is being taken. That is clearly of greater impact than the building of the project. Why is the loss of the site not put in the context of overall community need over time?

9. The need for educational space needs to be addressed. The Mauka Area Plan identifies the need for five elementary schools. It suggests that three schools of children will go to private schools without consideration of private school capacity. Intermediate and High School capacity also need to be included. We did not see such discussion in the DEIS.

10. The Mauka Area Plan identifies Pohukaina and KCC as possible future elementary school sites. In a March 29, 1993 reply it was stated that the DOE had, in the past, not viewed these sites favorably. We ask why is not the current position of the DOE be taken into account? Is it the duty of an EIS author and planners to take into consideration the best and latest information? We are of the understanding that the site is needed by the DOE for active instructional education. What are the consequences of the loss of the site? How limiting is only getting Building 857? How limiting would the total loss be?

11. We had expressed concern over the building of housing, with limited tax dollars, to attract U.H. faculty from the mainland with above average incomes while a large

number of residents and public school teachers are in need of housing alternatives. In a reply dated March 29, 1993, it was noted that the social impact study addressed this question. We could not find it in the DEIS. Again, what is the impact on housing short Hawaii residents of building housing, with tax dollars, to attracting more people from out of state? Is this not a social impact of the project?

12. We had asked about the effects of pile driving on the classes and activities at McKinley? What if the driving doesn't occur during the summer? What about the summer classes? How close is Building A to collapse? Will the vibrations cause collapse and take lives? In the DEIS it is not clear to us that the poor condition of Building A was taken in to account. Why were other instances of school noise problems not looked at as a source of information for the project impacts?

13. We asked if the project is an allowable and proper use of the site under the Mauka Area Rules and Plans of the HCDA? Does this mean that the entire block can be used for other Hale Kewalos? What does "Public" really mean?

15. Would it be possible to substantially reduce the need for new UH Manoa faculty rental housing units, new parking garages, and new buildings by shifting future construction and programs to Hilo and West Oahu? What are the relative costs to realistically decentralize rather than concentrate at Manoa? How will housing in Kakaako fit or not fit in the long term objectives?

16. The project has become a central concern of the entire State with regard to the adequacy of educational instructional facilities as can be seen by the attached resolution of the Hawaii State PTA/PTSA and the 11,000+ signatures we presented to the Governor asking that Hale Kewalo be re-located. The resolution was unanimous except for one abstention. The fact that no realistically open public hearings (preceding the decisions made) have been held is also of direct concern and a threat to many parents and educators. The social impact of the "back room taking" of public school land from the children of Hawaii was the clear potential of social ramifications. What is the social impact?

17. Much press has been given to the fact that many of the projects planned for the area will emphasize non-super luxury condos since that part of the market has disappeared. How are the latest student projections for the area affected?

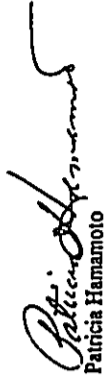
18. Many people have characterized the planning process for Hale Kewalo, thus far, as a "hundred year decision based on the 5 year student projections of two buildings". Please explain why the cumulative effects of the growth potential of the neighborhood, including areas adjacent to Kakaako, is not addressed in the EIS or require as part of the report.

We ask that all concerns preceding, received from others, and required by law be adequately addressed in the final EIS in the cumulative long term interest of the people of

Hawaii. We also ask that a copy of your written reply be sent to all signatories of this letter. This letter is not intended to imply that the past concerns submitted have been adequately addressed to this point in time. We look forward to your reply.

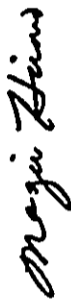
Sincerely,

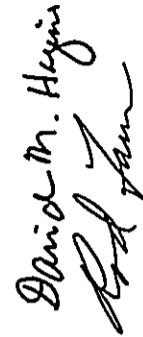

Paul Kadooka
McKinley PTSA President


Patricia Hamamoto
Principal, McKinley High School


Suzanne N. J. Chun


Kenneth H. H. H.


Mojib Zains


David M. Higin

Attachment
cc: Office of Environmental Quality Control
Attn: Mr. Brian J. Choy
Wilson Okamoto & Associates, Inc.
Attn: Mr. Earl Matsukawa
Housing Finance and Development Corporation
Attn: Al Ahana



May 26, 1993

Mr. Paul Kadooka, et al.
MHS PTSA President
c/o McKinley High School
1039 South King Street
Honolulu, HI 96814

Dear Mr. Kadooka, et al.:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 20, 1993 commenting on the subject Draft EIS. While we chose to ignore such references in your prior letters, we are dismayed by the continuing innuendos in your comments of impropriety on the part of the EIS preparers. HCDA has never attempted to "circumvent" the EIS process. Our decision to proceed with the preparation of an EIS was a matter of expedience to avoid potentially lengthy court proceedings. Every effort has been made to assure that the previous environmental assessment and current Draft EIS are objectively prepared disclosure documents. We believe that the work produced by our consultants has been thoroughly professional and of superior quality, particularly when compared to others dealing with projects of similar scale in an urban setting. We acknowledge your opposition to the project, but feel that all parties would be better served if less attention were placed on attempts to discredit the EIS and its preparers, and more effort given to improving the quality of information to support subsequent decision-making.

We offer the following responses in the respective order of your comments:

1. Our previous response to you needs to be clarified. The State EIS law does not require that a site be assessed with respect to any other use (as opposed to every conceivable use), other than the proposed use. The problem is that if this were not a general requirement, the variety of potential uses of a site would make the assessment of each use



HAWAIIAN GOVERNMENT
DEVELOPMENT AGENCY



KAKAIAO
Hale Kewalo Center for the Arts

John D. Wallace
Commissioner

Gary Culliford
Commissioner

Michael N. Scanlon
Assistant Director

677 Ala Moana Boulevard
Suite 1007
Honolulu, Hawaii
96813
Telephone
(808) 587-2870
Facsimile
(808) 599-2813

McKinley High School PTSA
1039 South King Street
Honolulu, HI 96814

May 5, 1993
EMERGENCY RESOLUTION
Educational Land

- (1) Whereas, the Hawaii State PTA/PTSA is chartered in the State of Hawaii and has been in existence in Hawaii for 67 years.
- (2) Whereas, the Hawaii State PTA/PTSA is concerned about the educational land issue.
- (3) Whereas, Hawaii State Legislature at the 15th & 16th Legislative Session funded thirty one & a half million dollars for the Hale Kewalo Project on the former McKinley High School/KCC Pensacola site without any public hearing. This action will forever take away 5.3 acres of educational land from the public instructional educational system.
- (4) Whereas, Board of Education and the Department of Education has in the recent past given up two school sites in the immediate area of McKinley High School; Pohukaina & the Linekona school sites. It is evident by these decision the lack of long range planning by the Department of Education.
- (5) Be it resolved that the State Legislature is requested to enact legislation to ensure that no land used for education be given up by the Board of Education and the Department of Education without public hearings.
- (6) Furthermore, be it resolved that the Hawaii State PTA/PTSA request the State Legislature enact legislation to change the Hawaii Revised Statutes Section 171 and Section 206 to reflect that no educational land can be taken away by way of Executive Orders or by way of agreements between the Board of Education and other boards without the consent and approval of the Board of Education, Department of Education, all other affected boards and commissions, and the legislature thru public hearings.

unmanageable. It should be understood that the EIS assesses environmental impacts and is not intended to provide a comparative needs analysis.

Your characterization of the Draft EIS's discussion of the impacts of the project on educational facilities and needs as "shallow, will-discuss-in-the-future type analysis" is evidently based on frustration over the lack of sufficient, quantifiable information to justify, in no uncertain terms, your position that the project must be reserved in its entirety for education over all other uses. Unfortunately, such data does not exist; and the EIS can only provide the best information currently available.

Your description of the Mauka Area Plan's reference to potential use of the project site is misleading. The Plan states: "One of the (elementary) schools may be located and could share the grounds of the present Kapiolani Community College site should there be a reduction in the activities of the college." (emphasis added) Further, in no way does the Plan preclude consideration of the site for other public purposes.

The ETO provides the type of vocational training program which the Mauka Area Plan states should be retained on the KCC site.

Specific discussion of the "need" for intermediate, high school, or adult education facilities beyond the assessment of demand expected to be generated by the project and the expansion requirements of McKinley High School which are covered in the Draft EIS, has not been included in the EIS because they have not been determined to be immediately relevant to the discussion of impacts associated with the project. The DOE itself, while expressing a preference for retention of the site for elementary school expansion purposes, has indicated it has no specific plans in this regard, and to date has not sought to conduct such a needs assessment.

As discussed in the Social Impact Assessment (Appendix E), HCDA's latest projections indicate a

likely 2010 population in Kakaako of 22,700 generating approximately 900 students (grades K-6: 569; 7-8: 115; and 9-12: 228) based on DOE estimates. This assumes realization of approximately 43 percent of the gross maximum buildout capacity of the District. Fifty-year forecasts have little, if any, value for traditional community planning purposes and are only constructed for the development of "blue-sky" scenarios.

Rather than "taking an educational instructional site", the project expands the potential use of the site to meet a broader range of community needs relating to affordable housing, higher and lower education, and recreation.

We assure you that if you have discovered "bias or project advocacy" in the Hale Kewalo EIS when compared to the Pawa EIS, it is only because of your predisposition to find such a distinction. While we understand your strong concern about the project, and your desire to have included in the EIS primarily opposing viewpoints, or findings which emphasize negative impacts, we stress that neither the agencies, the consultant nor the sub-consultant have used the EIS to advocate any viewpoint regarding the project. Rather, all parties have made an effort to examine all sides of the issues and to present findings which are based on an objective analysis. While these findings may not be consistent with your own opinion, they are the result of objective studies conducted to fully explore the various impacts of the Hale Kewalo project.

2. The EIS is intended to address the impacts associated with the Hale Kewalo project, not the proposed renovation of the McKinley High School Administration Building. As noted in Part VI of the Draft and Final EIS, Alternatives to the Proposed Action, if the project does not proceed, control of the property will transfer to the University of Hawaii. We are not aware of any alternate plans by the University other than that discussed in the EIS which entails use of the

CORRECTION

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

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Supply of Faculty Housing Units, and in the SIA. In implementing the UH Faculty Housing Assistance Master Plan, the University identified only three suitable areas, two in the urban core: the proposed site and another in Manoa near Noelani Elementary School. Plans are proceeding for the development of faculty housing at both locations. The third yet-to-be identified site is indeed in West Oahu, and would be developed in the future in conjunction with the proposed second campus in Kapolei.

The parking demands on campus would be no different than if faculty were forced to find accommodations elsewhere on Oahu since they would still need to commute. The Hale Kewalo project has the advantage of being located near major public transportation lines which could alleviate parking demands.

Your comment regarding traffic congestion at the campus is illogical. The jobs and associated traffic at the campus is unrelated to the development of the Hale Kewalo project. Even without the Hale Kewalo project, someone (perhaps less qualified than one the Hale Kewalo project might have attracted) would fill the job on campus and add to the traffic there.

5. As discussed in the Social Impact Assessment (Appendix E), the UH Faculty Housing Assistance Master Plan has six components:

- o Information/Counseling assistance and program administration;
- o University rental housing;
- o Mortgage assistance;
- o Downpayment assistance;
- o Housing allowance assistance; and,
- o University for-sale housing.

The proposed Hale Kewalo faculty housing is just one of the projects implementing the university rental housing component. The other components are not alternatives to university rental housing. Those programs are also being pursued to implement the larger master plan.

property or its existing improvements by McKinley High School.

3. As stated previously, the EIS is not intended to assess any other use than that proposed for the site.

The comparison of the McKinley High School/Neal Blaisdell Center block to Ala Moana Park is outlandish. The Social Impact Assessment and Draft EIS already discuss the change in land use pattern that will result from the proposed project.

The specific use of the park/open space on Kapiolani Boulevard has not been determined. Its rectangular shape, level surface, size, and contiguity with the adjacent athletic field, provide as much flexibility for planning of potential facilities as possible. The proposed Hale Kewalo project provides significantly more park/open space than required under HCDA Mauka Area Rules.

4. The State's effort in the development of affordable housing is certainly not limited to urban Honolulu (witness the State's effort in Kapolei). It is a multi-pronged program that includes as a major component the provision of affordable housing in the urban core where, as discussed in the Draft EIS, needs are especially critical.

The highly constrained situation with respect to affordable housing is discussed in Chapter V, Section C, Impact on the Supply of Affordable Housing, and in the Social Impact Study, or SIA, (Appendix E). The site is one of only six State-owned sites within the urban core found to be potentially feasible for development of moderate to high density affordable housing projects. Given the crucial need for housing, particularly in the urban core, each of these sites presents an important opportunity that must be seriously pursued. It is not an either/or proposition.

The situation with respect to faculty housing is discussed in Chapter V, Section D, Impact on the

Mr. Paul Kadooka, et al.
Page Seven
May 26, 1993

SIA, and it is clear that there is a potential problem. We disagree that including another case study would alter this finding.

8. The HCDA has participated in ongoing communication with the DOE regarding the educational needs of the Kakaako District since it was established in 1982. We too would be very much interested in realistic alternatives to meeting education demands of the district and have encouraged the DOE to formulate a long-range strategy. The HCDA has also sought student enrollment projections for areas beyond the Kakaako district since it would provide a realistic picture of the future demand on schools serving the district. This information, if it were available, would be valuable for more accurately assessing the impacts of the Hale Kewalo project on educational facilities. We disagree with your characterization of the project as a taking of educational land. Please refer to our response No. 1 regarding the assessment of alternate uses.

9. We did not suggest that "three schools of children will go to private schools." As discussed on page 20 of the SIA, the original estimated need for five elementary schools was adjusted downward to two schools based on an analysis of the unused capacity of elementary schools in the area.

It is inappropriate to study the capacity of private schools in an SIA. The DOE is mandated to meet the needs of the population, regardless of the ability of private schools. Capacity information on intermediate and high schools is included in Table 11 of the SIA.

10. Based on the DOE's recent position, Chapter VI, Alternatives to the Proposed Action, in the Final EIS has been revised to acknowledge that while the DOE has not specific plans at present, the area should be considered as a location for a new elementary school or for expansion of McKinley High School. Please refer to our response No. 1 regarding the assessment of alternative uses.

11. The UH faculty members who will live on-site will not have "above average incomes," as you repeatedly

Mr. Paul Kadooka, et al.
Page Six
May 26, 1993

6. We find it perplexing that you "could not find such specific inputs from the community in the DEIS." Section 5 of the SIA, which runs from pages 52 through 64 fully discusses community issues related to the development of Hale Kewalo. As explained in that section, community issues are people's reactions to community events, changes and problems. Issues change over time, as people's priorities and values change. Community issues represent opinion, and the SIA presented issues related to (1) the competition between the proposed project and educational needs; (2) school - resident compatibility; (3) construction impacts; (4) historic and visual impacts; (5) the appropriateness of the faculty housing component; and (6) the impact on non-educational public facilities and services. These issues represent a full range of concerns related to the project as of March 1993.

One possibility for your comments is that you preferred the SIA to use another methodology for issues analysis. We infer that you wanted the SIA preparers to go out and solicit direct input from the community, rather than conduct a correspondence, literature and media research. We note that, while Earthplan has often used informant interviews and focus groups in its issues analysis, such techniques were unnecessary for Hale Kewalo. As discussed on page 52 and 53 of the SIA, the resource materials included (1) responses to the Draft EA, (2) responses to the EIS Preparation Notice, (3) the complaint, (4) media articles and (5) miscellaneous material. These materials contain a wealth of information; interviews would not have added to the breadth and range of opinions presented in that material.

Comments regarding the objectivity of the SIA are unfounded. The objectivity of the SIA is apparent in that the aforementioned issues obviously focus on negative perceptions about the project.

7. Resident-school compatibility was not given minimal attention. The resident-school compatibility impact was fully discussed on pages 42 to 44 of the

Mr. Paul Kadooka, et al.
Page Nine
May 26, 1993

13. As we have stated before, the Hale Kewalo project as proposed is in compliance with HCDA's Mauka Area Plan and Rules. Part IV of the Draft and Final EIS, Relationship to Plans and Policies, includes a discussion of this matter. As defined on page 19 of the Mauka Area Plan, areas designated "PUBLIC" represent lands which are currently publicly-owned. The designation in itself is not prescriptive in the sense of defining allowable uses or other development parameters. These factors, pursuant to Section 15-22-40 of our Mauka Area Rules, are determined by applying the provisions associated with the adjacent land use zone.

Item 14 was omitted in your letter.

15. We fail to see how this comment is relevant to the Draft EIS for the Hale Kewalo project within any reasonable interpretation of the State EIS law and Hawaii Administrative Rules.

16. We acknowledge the strong community sentiment on this project which you describe in this comment. We strongly disagree with your opinion regarding the manner in which the Executive Order was established. There was no "back room taking" as you allege; the process was straightforward and legal.

Regarding discussions of social impacts of this matter, please read Section 4.4.4 of the SIA. From pages 45 through 47, we discuss project impacts on the expansion of McKinley High School.

17. As mentioned earlier, the latest HCDA/DOE projections indicate that by the year 2010 approximately 900 students (grades K-6: 569; 7-8: 115; and 9-12: 228) will originate in the Kakaako District. There is insufficient information at this time to determine the extent, if any, to which potential changes in target markets by private developers in the District will impact these projections. For example, contrary to popular belief, "non-luxury" market projects such as the Royal Capital Plaza project in Kakaako have not generated discernably greater amounts of public

Mr. Paul Kadooka, et al.
Page Eight
May 26, 1993

assert despite our numerous explanations to the contrary. As discussed on page 4 of the SIA, all of the on-site residents will need to meet income requirements. The faculty members are no exception. We would encourage you to review the DEIS more thoroughly; you will find a full discussion of faculty housing social impacts in Section 4.2.2 of the SIA.

You imply that the faculty housing portion of the Hale Kewalo is somehow competing with the affordable housing needs of our community. We disagree with you for two reasons. First, the bottom line in developing faculty housing is that UH needs a housing program to attract and retain quality faculty. This is directly related to the quality of education in Hawaii. To suggest that UH faculty are not an integral and vital part of the community with similar socioeconomic needs and aspirations is a point of view that defies a rational response.

Second, the project will benefit the affordable housing supply for the community, and not compete with "local" needs. At least half of the proposed housing units will be for the general public.

12. As stated in our response to the same comment in your previous letter, the noise and vibration study (Appendix D) took into account the condition of buildings on campus by using a low threshold factor which is one step above the factor for ruins and ancient monuments and two steps below the "no risk" factor associated with average buildings. The distance of the historic buildings from the nearest pile driver is predicted to keep the level of vibration within the threshold level. These predictions will be verified by seismographic monitoring while test piles are driven.

The school noise factor was clearly taken into account by the reference to the DOE criteria for construction noise impacts on classrooms (L50>62 dBA) in the noise study.

Mr. Paul Kadooka, et al.
Page Ten
May 26, 1993

school students than "luxury" projects in the service area.

18. The SIA addresses the cumulative social, economic, cultural and educational aspects of the study area surrounding the Hale Kewalo project site.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Eari Matsukawa, WOA
Ms. Patricia Hamamoto, MHS
State Representative Suzanne N.J. Chun
State Representative David M. Hagino
State Representative Kenneth Hiraki
State Representative Rod Tam
State Representative Mazie Hirano

McKinley High School
1039 S. King St.
Honolulu, HI 96814
May 22, 1993

RECEIVED
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HAWAII COMMUNITY
DEVELOPMENT
AUTHORITY

Hawaii Community Development Authority (HCDA)
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
Attention: Harold Edwards

Dear Mr. Edwards:

Thank you for your letter of March 29, 1993, relating to the Environmental Impact Statement Preparation Notice for the Hale Kewalo Rental Housing Mixed-Use Development.

The EIS for the Hale Kewalo project is not being relied upon to assess the unhealthy condition that exists in the McKinley High School science building. Indeed, the problem has been assessed by the proper authorities and is in the process of being corrected by replacing the noise abatement system with air conditioning. Two science rooms are scheduled to be air conditioned this coming summer. However, it will take many years to acquire funding to air condition the remaining rooms. In the meantime, students and teachers will continue to be exposed to an unhealthy environment.

The prospect of having fugitive dust from the Hale Kewalo construction site aggravate the already unhealthy condition in the science building is a very deep concern. The adverse impact would be especially pronounced during Kona wind conditions. Please address this concern.

Sincerely,

Barbara Rogers

Barbara Rogers
Chair, Science Department

c.c. HFDC
Wilson Okamoto and Associates, Inc.
Office of Environmental Quality Control



HAWAII COMMUNITY
DEVELOPMENT AUTHORITY



John D. Walker
Chairman

Carly Caulfield
Chairwoman

Michael N. Searfone
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone
(808) 562-3000
Facsimile

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Ms. Barbara Rogers
Chair
MHS Science Department
McKinley High School
1039 South King Street
Honolulu, HI 96814

Dear Ms. Rogers:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 22, 1993 commenting on the subject Draft EIS. As stated in our previous letter of March 29, 1993, dust generated during construction is subject to State air pollution control regulations which require that there be no visible fugitive dust at the property line of the project site. It is the construction contractor's responsibility to comply with these regulations. A heavy fine can be imposed for each violation.

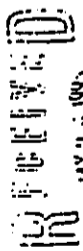
Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,

Eric J. Masutomi

Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA



Ala Wai Plaza 911
500 University Avenue
Honolulu, HI 96826

MAY 20 1993

May 21, 1993

WILSON OKAMOTO & ASSOCIATES, INC.

Mr. Eric J. Masutomi
Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Thank you for providing me a copy of the draft Environmental Impact Statement (DEIS) on the Hale Kewalo Rental Housing Mixed-Use Development projected for the former site of the KCC Campus at Pensacola Street (Tax Map Key 2-3-09:1).

The DEIS has addressed some of the issues of my concern, however, there are still issues which I believe need further study.

To provide clarity to my statements and in the interest of brevity, I will refer to the numbered items in your letter to me of March 29, 1993.

Item 1 indicates that you propose to monitor ground vibrations during pile driving. Will you cease pile driving if indicated by the monitoring of the ground vibrations or if additional damage is found in McKinley High School's Building A which would indicate that potential damage and collapse are imminent? Will you recognize and utilize a recent engineering report on the structural soundness of Building A at McKinley High School? Your office will, in the eyes of the people of Hawaii, be most negligent if Building A sustains further damage and if the health and safety of personnel contained therein are compromised in any way.

In item 2 which concerns the public views, I beg to differ with you that the "front view of the historic McKinley campus from King Street, which has been identified and assessed as an important vista, will not be compromised." Attached is an article written in the February 1985 edition of "Malama Kaka'ako" prepared by the staff of the Hawaii Community Development Authority. On page 3 there is an article on McKinley High School as a historical/cultural resource in Kaka'ako. If in 1983, your agency recognized the historic front view of the campus,

please explain why now, two twenty-eight story towers will not alter the view? The public I am sure joins me in believing that the "view corridor" is not a compromise on this vista. Is the construction of Hale Kewalo consistent with the stated 1983 position on McKinley High School? Has HCDA changed its position from 1983 with regard to McKinley's site and its vista? If so, by what means? What notification was given to McKinley High School if there was a change? Please provide me a copy of any such document.

The DEIS still does not seem to see that the entire piece of land bordered by King, Pensacola, Kapiolani and Ward is an integral part of the Thomas Square Historic District and as such any building whose elevation is in direct contrast to those currently on the property, destroys the character of the district. How can the view afforded from both within and without the historic campus remain in character with the Thomas Square Historic District if the Hale Kewalo project is built?

You note in the first paragraph of item 2 that "...such locations are not identifiable as important scenic vantage points or view corridors." What criteria was and is used to make such a determination about McKinley? By whom was it made and was there public input? In paragraph two of the same item, you state the "important consideration is whether or not significant public views are affected." What determines HCDA's sense of "public view"? No doubt the approximately 90,000 graduates of McKinley High School and their families have the public view that the entire campus is the vista of McKinley High School. Would HCDA consider building twin towers on the grounds of Iolani Place even in the corners of the grassy areas? Would the vista of the Palace be compromised?

In item 3, the social impact of Hale Kewalo on McKinley High is the subject. As a historian, I cannot understand why we cannot learn from history. Other schools such as Iolani have built housing on their campuses. The Royal Iolani, built on Iolani's campus, is air-conditioned. Still the residents of the Royal Iolani have continued to complain so much that the students of Iolani have changed their typical high school lives to accommodate their "tenants". The complaints continue to cause conflict between the tenants, the students and staff of Iolani. Why do HCDA and the University of Hawaii insist on creating potential conflict?

The argument presented about the other units being developed across from McKinley High School does not address the issue. The units across from the school have several natural buffers from the campus, namely the noise of the traffic and the distance it is from the campus. When we are talking about the Hale Kewalo project, the noise factor is

directly adjacent to the project. Why do you think that air-conditioning units in the project, assuming all will purchase their own, will mitigate the sounds?

With regard to the University of Hawaii's intent to build its own housing should this project not be built, they, too, would be setting up conflict? Is that educationally or philosophically sound between two institutions of learning?

Why is there no mention in the DEIS of the social impact of Hale Kewalo on the public, civic, educational, recreational, political and electoral groups which utilize the McKinley campus year-in and year-out? Won't the Hale Kewalo project forever affect these groups and their programs as well as the thousands of taxpayers to whom these groups provide services?

Through personal observations and actual rental usage, we find that when the campus is used for political, recreational, athletic and public events, McKinley's campus parking is utilized to capacity including illegal parking obstructing fire lanes. Overflow from the campus parks on the streets adjacent to the campus and Kapiolani Boulevard. We know from past history when KCC was adjacent to the parking lot at Pensacola, that the Hale Kewalo tenants and the ETO users will compete for space at McKinley and for on-street parking. Was a study made of the utilization of existing parking at McKinley and the area around when McKinley is utilized by the taxpaying public? Will this impact be addressed?

In item 4, I can assure you that there will be joint use by the occupants of the Hale Kewalo project of the athletic facility of McKinley. The community already uses the tennis courts, outdoor basketball court and the track as well as the area around the front of the campus. All of these areas through use wear out. Having the occupants of 529 apartments with easy access to them to utilize instead of having to run to a nearby park or private athletic facility will only hasten the already deteriorating condition of these areas. You indicate that the residents of Hale Kewalo will not have any "greater access". By what means did you determine that in light of the proximity of the project to the facilities? The potential number of users of McKinley's campus by persons living in the towers is over 1,000 if you simply use a figure of two per apartment. That does not take into consideration your multi-bedroom units nor the fact that many studio apartments in housing projects have more than one dweller. Was this considered in a study? Any objective study of these issues should have addressed this problem because it currently exists and is likely to mushroom with the proposed 529 unit project. Will it be studied?

In item 5, you say that the number of parking stalls proposed exceeds the requirement for parking stalls in the project. However, how realistic are these standards in meeting actual need? What are the statistics to show the actual number of cars per apartment for a similar building? Don't most apartment projects find themselves short of parking stalls despite meeting city and county parking standards including those which exceed HCDA's standard?

Several other issues need to be addressed. McKinley High School is a district center for students with hearing impairments and for those who are visually handicapped. The noise of construction will greatly affect these students. They are totally integrated throughout the school and therefore can not be shielded from the noise. Have you considered and studied the effect the construction will have on the learning as prescribed for these and other handicapped students? Students with attention deficit disorder have great difficulty in noisy situations and we also have those students throughout the campus. Won't the Hale Kewalo construction interfere with their right to the optimum education for their handicapping condition? What will HCDA do to not interfere with their federal and state rights to an accessed education?

In the DEIS, you mention several times that the KCC site was not considered in the expansion plans for McKinley High School. Each time, however, you fail to add that last sentence in the McKinley High School Campus Development Report made by Architects Hawaii. Why have you failed to include the following: "This planning report does not consider McKinley use of the KCC site because the 'move-out' date is still not determined and there are other interests vying for use of the college site." (p. 12, 1981 report) How could McKinley or the DOE consider uses when this was the situation?

While I recognize that Governor Walhee has executed a new executive order to give control of the land to the University of Hawaii, his actions came only after it was determined by McKinley High School Coalition that the original executive order on the land was in place. Does the apparent transfer by EO 8567 negate the historic significance of the property or the original use, namely public education?

At the time of the Architects Hawaii study of the development of McKinley High School, all of the regulations both Federal and State concerning special needs students including those with specific handicapping conditions and the SLEP students and Vo-Tech programs were not under the regulations for class size and size of classroom that exist

today. Currently the special education classes of McKinley High School are housed in sub-standard size rooms. The space at KCC could correct that deficit. However, because no move-out dates were firm, McKinley was not able to consider it. There is much litigation in Hawaii concerning the education of special needs students. Will the Hale Kewalo project be the impetus for further litigation?

In the cultural and historical study in the DEIS, I note that no mention is made of the owners of the property at the time of Executive Order 101. Why were their lives and families not included since they were the occupants at that time? Will their possible contributions through cultural/historical/archeological assessments be studied? If not, why not?

In considering the cumulative affect of the Hale Kewalo project on the social, economic, cultural and education aspects of the community, how can it be accurate to have utilized an EIS for Kaka'ako which was done in 1983, almost 10 years ago? Will you be making a more realistic study of the cumulative effect of the Hale Kewalo Project in relation to all of the projects in the Kaka'ako District as well as the district that McKinley High School serves including the Pawa and Superblock on Keamoku Street projects? No true effects of this project can be seen without a current study.

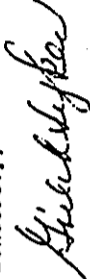
While, the DEIS is a beginning, I believe that further study should be made on the issues presented herein. The erection of two towers will last well into the next century and FOREVER affect McKinley High School, the Thomas Square Historic District, the social/political/cultural groups utilizing McKinley and most of all the citizens and taxpayers of this state. When tax revenues are increased to provide for land for education in this urban corridor, it will be because of Hale Kewalo. In your own master plan, you have cited the need for more schools. The two sites prominently mentioned were Pohukaina and KCC. Pohukaina has been given to another use and now, do you continue to seek to "give away" KCC?

Neither I nor others who oppose this project are against housing. However, we do believe that housing on the former KCC site is not acceptable. A proper study with cumulative data would concur in that fact. I continue to believe that the Hale Kewalo project will have a direct negative impact on McKinley High School and this urban core. For this reason, I continue to ask you to relocate the project.

One other issue must be addressed. Throughout the DEIS statements are made that the opposition to the project is rather local and with persons having to do with McKinley High School. The Save McKinley Coalition's petitions show quite an opposite picture. Of the over 12,000 signatures, approximately 4/5 of them are from persons throughout Hawaii including neighbor islands. It is not a local issue. Will you acknowledge that? Will you study if it is "local"?

Thank you for the questions answered in previous communications. I look forward to the answers forthcoming to items queried in this letter.

Sincerely,



Galle A. Sykes
Historian
Teacher of the Deaf
Athletic Coach
McKinley High School

Attachment

CC: Housing Finance Development Corporation
Office of Environmental Quality Control
Wilson Okamoto and Associates, Inc.

Recognition and Preservation HISTORIC/CULTURAL RESOURCES IN THE KAKA'AKO DISTRICT



The Kaka'ako Plan and Rules emphasize the recognition and preservation of historic and cultural resources in the Kaka'ako District. "The retention of historic and cultural sites promotes the uniqueness of Hawaii's history. Such sites are important visitor attractions and thus, an asset to the community," the Kaka'ako Plan states.

The Authority has recognized eight historic and cultural resources in Kaka'ako; others may also be recommended for preservation in the future. According to the Kaka'ako Plan rules, owners, developers or lessees of these historic/cultural sites cannot demolish, alter, repair or construct on these sites without first getting a "Certificate of Appropriateness" from the Authority. The Authority would grant such a permit if the proposed action would not hinder preservation and enhancement of the resource, if the existing property is "totally inadequate" for the owner's legitimate needs, or if the owner is not able to earn a reasonable return unless the proposed project is undertaken.

The Authority recently granted a Certificate of Appropriateness to allow construction of four classrooms on the McKinley High School grounds. McKinley High School has been designated as a historic site. The classrooms, which will include food service, family food, clothing and childcare facilities for the home economics department, will be constructed at grade and within the building structure of the existing two-story academic core building. The existing academic core building had been designed to allow future expansion.

FIFTH YEAR ANNUAL REPORTS NOW AVAILABLE

Copies of the Hawaii Community Development Authority's annual report, "Review of the Fifth Year" are now available. The report, covering the Authority's activities for the period July 1, 1981 to June 30, 1982 may be picked up at the HCDA office at 680 Ala Moana Blvd., Suite 318.

The 26-page report describes the Authority's activities and accomplishments during the past fiscal year. It also reviews the Authority's legislative foundation and the activities completed during the first four years of operation. Activities planned for the Authority's sixth year are also described.

The report also contains information on HCDA's fiscal program (expenditures and appropriations) for the 1981-1982 period.

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Mālama Kaka'ako

Malama ... caring for, taking care of

HAWAII COMMUNITY DEVELOPMENT AUTHORITY
 State of Hawaii
 680 Ala Moana Blvd., Suite 318
 Honolulu, Hawaii 96813
 Vol. 4, No. 3
 February, 1983

RAYMOND H. SUEFUJI RETIRES AS HCDA EXECUTIVE DIRECTOR



Raymond H. Suefuji



Paul T. Tajima

After completing nearly 36 years of public service, Raymond H. Suefuji has retired from his position as Executive Director of the Hawaii Community Development Authority effective January 31, 1983. The Authority members accepted Suefuji's resignation at its January 12 meeting, and also appointed HCDA Project Coordinator Paul Tajima as Acting Executive Director.

Suefuji was appointed by the Authority as its Chief Executive Officer in 1977. He served as the Planning Director of the County of Hawaii for 11 years, and later as legislative consultant to the Legislative Reference Bureau before he was appointed to head HCDA. The Kaka'ako Plan and Rules were completed last year and its implementation and enforcement began under Suefuji's guidance.

Tajima, who holds a Master degree in

Land Economics from Columbia University, New York City, has served as the Authority's Project and Program Coordinator for the past five and one-half years.

"Serving with the Hawaii Community Development Authority has been the most significant period of the more than 35 and 1/2 years I have been privileged to serve in the public sector," Suefuji told the Authority members. "The rewards during my tenure as your Executive Director have been numerous, not the least of which being the rare opportunity to have been a direct part of a heretofore unprecedented mission in the annals of the State of Hawaii government."

Suefuji said that the Authority has entered the second major phase of its work where "new and complex challenges and decisions lie ahead. I believe the Authority will rise to meet each challenge and continue to distinguish itself in the months, years, and indeed, decades ahead, as a bold and innovative force for progressive community development," he added.

INSIDE THIS ISSUE:	
Plan Amendments Take Effect	... Page 4
Alternative Futures for Makaj Area	... Page 2
Preservation of Historic Sites	... Page 3



HAWAIIAN COMMUNITY DEVELOPMENT AUTHORITY



KAKAIAKO
Hawaiian Community Development Authority

John D. Walker
Chairman

Gary Caulfield
Chairman

Michael N. Scalfone
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
19101
Telephone:
(808) 537-2200
Facsimile:
(808) 537-2413

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Ms. Galle A. Sykes
Ala Wai Plaza 911
500 University Avenue
Honolulu, HI 96826

Dear Ms. Sykes:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 21, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. As discussed in the Draft EIS, seismographic monitoring will be conducted during test pile driving to determine the appropriate pile, pile driver and methods, such as pre-drilling, to be used for preventing damage to structures. A low threshold value was selected as the maximum allowable level of vibration as discussed in the noise and vibration study (Appendix D). Of course, if damage from pile-driving operations is incurred at any building in the vicinity of the project site, operations will be halted until the matter is investigated. We have forwarded the engineering report you refer to our engineers for their review.

2. Our position remains the same as it was in 1983 regarding the importance of those aspects of the McKinley High School campus that merited its designation as a historic site. Unfortunately you are apparently operating under the misconception that the campus in its entirety has been determined to be historically significant. This is not the case. The portion of McKinley High School listed on the National and Hawaii Registers of Historic Places, identified as Site 9926, is confined to the Quadrangle area, the Commercial Building, the Home Economics Building, the Marion McCarrell Scott Auditorium, the Senior Core Building, and the Fred Wright Swimming Pool (Figure V in the Draft EIS

Ms. Galle A. Sykes
Page Two
May 26, 1993

depicts the included area). All other areas and structures do not enjoy such distinction. It is within the foregoing context that we previously indicated to you that the view from King Street of the "historic McKinley campus (the central quadrangle and seven historic structures collectively) would not be adversely affected by the proposed Hale Kewalo project. While we appreciate your contrary opinion on this matter, the agency vested with the ultimate responsibility in determining such impacts, the State Historic Preservation Division (SHPD), has affirmed our finding in its assessment that the Hale Kewalo project will have "no effect" on Site 9926. In evaluating the visual impact of the project on the historically significant portions of the high school, it is our understanding that the SHPD considered a number of factors, including the location and intervening distance of the project with respect to Site 9926, the relative heights of the proposed towers, and the overall potential of the project to impinge on the educational and architectural significance of Site 9926.

3. We are confused by your reference to a "Thomas Square Historic District." We are not aware of any such designated area. Perhaps you are, instead, referring to the City's Thomas Square/Honolulu Academy of Arts Special District. If so, you are incorrect in your assumption that the Special District embraces the King - Pensacola - Kapiolani - Ward block. Except for a small setback portion fronting King Street, it has no bearing on the McKinley High School campus, much less the project site.

4. The references to significant views and view corridors in our previous response to you relate specifically to those identified in HCDA's Mauka Area Plan, which establish Pensacola Street, Kapiolani Boulevard, Ward Avenue and King Street as "view corridors" protected by yard and tower setback controls. The references also take into consideration the visual resource analysis included in the Final Environmental Impact Statement for the Kakaako Community Development District Plan (June

1983), which identified the vista from Kapiolani Boulevard looking mauka across the athletic field as a major view plane. Both documents were subject to public review and input prior to acceptance. Finally, your attempt to draw an analogy between the grounds of Iolani Palace and McKinley High School is faulty, based - as mentioned earlier - on the incorrect assumption that the entire campus, indeed the entire block, has been deemed historic.

5. As a historian, we believe you would concur that gross generalizations about history repeating itself would be inappropriate in an EIS. The social impact assessment analyzes the basis for the conflict at Iolani School and discusses the similarities and differences between that situation and the one involving McKinley High School and the Hale Kewalo project.

6. Distance from noise sources such as school activities will attenuate perceived noise level, while traffic noise, if it is loud enough, could mask the perception of the noise. We never suggested that the perceived noise levels would be the same for Hale Kewalo and other future high-rise residences in the area. Unlike other residents in the area, however, the residents in Hale Kewalo will be apprised in their rental agreements that they may be subjected to noise impacts from the school.

As explained in the Draft EIS, air conditioning would allow windows to be closed, thus providing a significant measure of noise attenuation.

7. Your questions are rhetorical and reflect your opinion that there is a conflict between uses.

8. It is uncertain from your comment why you believe that the groups you mention would be affected by the Hale Kewalo project. Assuming that you feel these groups generate significant noise which could elicit complaints from the Hale Kewalo, we would point out that, under current law, no body is permitted to engage in activities which produce excessive noise. If they do, their organizers are

required to obtain approval in writing from the Department of Health, with or without Hale Kewalo. The project will not cause the termination of non-school-related activities.

9. As discussed in the Draft EIS, the Hale Kewalo project will exceed the HCDA's minimum off-street parking requirements. If there is a problem with non-school related parking at the McKinley High School campus, it should be addressed by the school. The EIS process cannot be relied upon to assess or resolve the problem.

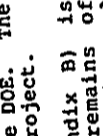
10. As pointed out in Chapter V of our Draft and Final EIS, Probable Impacts and Mitigative Measures, the demands of project residents on existing parks and recreational facilities (including those of the school) will be tempered by the availability of a 0.8 - acre recreational deck which will feature an array of recreational facilities, including a basketball court. In response to your concern regarding potential use of the school's track by project residents, we are also considering the addition of a running course to the project's recreational amenities (although, as we have indicated to your fellow teachers in a separate response, we are inclined to believe that any wear on the existing track from limited, shared use by the public is incomparable to that caused by the estimated 150,000 people that attend the farm fair each year). With respect to McKinley's tennis courts, it is our understanding that the courts cannot be accessed or used by the public without a permit from the school. Hence, while a locational advantage may exist, it is unlikely that the facility would be available for use by project residents to any greater degree than any other member of the general public. Finally, the 1.75-acre park/open space area that will be provided by the project should serve to further ameliorate any concerns.

11. The parking standards are established by the HCDA Mauka Area Rules. The Hale Kewalo project complies with these standards, they are not a result of the project. The issue is broader than just a matter

Ms. Galle A. Sykes
Page Six
May 26, 1993

Ms. Galle A. Sykes
Page Five
May 26, 1993

of the community. The Study Area of the assessment includes the projects you mention.

18. Thank you for summarizing your thoughts on the project. Please note that the HCDA was not involved in DOE's decision to relinquish control of the Pohukaina site. Meanwhile, your characterization of HCDA's effort in the Hale Kewalo project doesn't warrant a response.
 19. The EIS document is intended to objectively disclose information; drawing such conclusions in an EIS would be absolutely inappropriate. Even if your reference to a "proper study" relates to an examination other than the EIS, your conclusion is more conjecture than fact. We, nonetheless, acknowledge your firm opposition to the project.
 20. As discussed in the Social Impact Assessment (Appendix E) active opposition, as differentiated from passive supporters of your position, is mostly localized. The impetus for project opposition continues to originate within groups directly related to McKinley High School and Hale Kewalo. The petition and lawsuit are generated by school-related groups and individuals.
- Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.
- Very truly yours,

Eric J. Masutomi
Director of Planning
- cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, MOA
12. It encompasses of convenience for tenants. concerns such as the amount of traffic generated, demands for on-street or alternative parking, the cost of developing housing, and encouraging use of public transportation.
 13. As discussed in the Draft EIS, pile-driving, to the extent possible, will be conducted when school is not in session. If such as scheduled cannot be accommodated, then mitigation measures to attenuate noise impacts will be necessary. As discussed in the Noise and Vibration Study (Appendix D) the Department of Education uses a construction noise criterion for classrooms. This is a single criterion that does not distinguish among the type of class, grade level or special needs of students.
 14. We could not find any mention of the statement you refer to in the Draft EIS. The Social Impact Assessment states that "the expansion plan for McKinley High was based on the assumption that the project site would not be available." We are unclear as to the point you are making.
 15. Executive Order 3567 sets aside the property to the HCDA for housing and other purposes consistent with Chapter 206E, Hawaii Revised Statutes. As mentioned earlier, the site is not considered historically significant. The project includes public education uses.
 16. These questions should be directed at the DOE. The conditions cite are not caused by the project.
 17. The archaeological assessment (Appendix B) is intended to identify any physical remains of historical significance located on the site. A historic review of uses on the site provides the context for assessing the potential for finding any such remains. We do not understand how the information on landowners would contribute to the intent of the study.
 17. The social impact assessment (Appendix E) was prepared in March 1993 and addresses the cumulative social, economic, cultural and educational aspects

been cited as a reference that way. I WOULD LIKE THE DETAILS ON THE 83 SITES ANY WAY.

5. Regarding Alternate Uses: Why does DOE need "definitive plans" for the site? In DOE Superintendent Toguchi's 9/4/92 comment for the Hale Kewalo Draft Environmental Assessment, he states, "There is no feasible elementary school to develop in the Kakaako area. The Pohukaina site is too small...Hence the former community college site could be a location for the elementary school site or expansion of the high school facilities." Where in the Mauka Area Plan (MAP) and Mauka Area Rules (MAR) are "definitive plans" a requirement? PLEASE CITE SECTION AND PAGE NUMBER(S).

6. The Hawaii State Plan calls for "The orderly development of residential areas SENSITIVE to community needs and OTHER LAND USES" and promoting "location of housing developments taking into account the physical setting...and OTHER CONCERNS OF EXISTING COMMUNITIES AND SURROUNDING AREAS" (Article 226-19 (a)(2) and (b)(5)). Hale Kewalo is not sensitive to the McKinley High community, School, and Historic Site.

7. Hawaii Revised Statutes Chapter 206E mandates that "PUBLIC FACILITIES...shall be planned, located, and developed so as to SUPPORT the redevelopment policies for the [Mauka Area] district." "PUBLIC FACILITIES" include "SITES FOR SCHOOLS." Hale Kewalo is contrary to the Mauka Area Plan.

8. The Mauka Area Plan, created by HCDA, states that "two elementary schools will be necessary. This number is based on the number of elementary age students who are expected to attend public school. Based on the anticipated number of housing units in the Mauka Area, a total residential population of 47,500 would result. Of this total, approximately 2,200 persons would be of elementary school age.

"The first school may be located in the vicinity of the present Pohukaina Elementary...One of the schools may be located and could share the grounds of the present Kapiolani Community College site should there be a reduction in the activities of the college." KCC "Which teaches trades would be needed and is beneficial within the Mauka Area for the present and future business and industrial activities. Every effort should be made to retain the kind of activities offered" by KCC (page 83).

But Pohukaina, the first site, is being planned for a housing development. This leaves only the Hale Kewalo site for an elementary school to serve the entire Mauka Area of 450 acres.

If Hale Kewalo is built, this leaves only Ka'ahumanu Elementary which is outside of the Mauka Area to serve the Mauka Area. Ka'ahumanu is already at maximum (745) and is planning to have two portables on campus next year. An official admits

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HAWAII COMMUNITY
DEVELOPMENT
AUTHORITY

7310 Heulu St., Apt. 1002
Honolulu, HI 96822-3050
Sat., May 22, 1993

Governor John Waihee, State of Hawaii
c/o Office of Environmental Quality Control
220 So. King St., Suite 400
Honolulu, HI 96813

Dear Gov. Waihee:

Re: Draft Environmental Impact Statement
Hale Kewalo Rental Housing Mixed-Use Development
former KCC-Pensacola site next to McKinley High
School TRK: 2-3-09: por. 1. 5.3 acres

1. According to the EIS Guidebook, the Draft EIS document must present a "detailed description of the proposed action" in sufficient detail and depth. I feel this was not done. For example, the Pawa'a DEIS describes for each tower the types of units (number of bedrooms), number of each type, and the size of each type. The Hale Kewalo DEIS does not.
2. The Alternatives to the Proposed Action are not presented in detail or any depth as required by Title 11, Chapter 200-17. Only one page is devoted to this.
3. Regarding Alternative Sites: The DEIS states, "Given the large projected demand for affordable housing units, particularly in the urban core, every opportunity to provide such housing must be seriously considered." Opportunities must certainly be CONSIDERED; they must also be REJECTED when they are not suitable or compatible.
4. The Social Impact Statement (SIA) describes HFDC's attempts to identify potential housing sites for affordable housing. Eighty-three sites were inventoried. HFDC found only six sites within urban Honolulu were physically suitable for residential development. The Hale Kewalo site was one of the six (SIA p. 33, Footnote 12; full reference on p. 66). When I tried to obtain a copy of the report to read, a librarian at the Legislative Reference Bureau informed me, after checking with the Office of State Planning (OSP), that the January 1991 report to the Legislature by HFDC and OSP was never issued; there is no such PUBLIC document. She indicated that it shouldn't have

it is undesirable but feels caught between the need for classroom space and the limited outdoor space. Next they are not accepting any geographic exceptions except kindergarteners with siblings already at the school.

9. If the Pawa Superblock is built, where will the additional 195 K-5 students go to school? DOE has requested a K-2 school be built on the site, but the City Dept. of Housing and Community Development says the DOE "will be responsible for securing the funding necessary to construct such facilities" (5/14/92 letter to DOE Superintendent). The DOE is 700 classrooms short at present. When will it get funds to build at the Pawa site? (* The Pawa project has been reduced in size. I do not have the revised school estimates.)
Hale Kewalo and the Pawa Redevelopment are only two of the many potential projects to be planned for the area, Kaka'ako and the Alapai-Sheridan Special Area.

If multi-track year-round schools are approved by teachers and their unions, this can alleviate some overcrowding by increasing school capacity. But it can not solve all overcrowding. And it has yet to be approved and tried on O'ahu.

10. SIA's argument that because DOE has no specific plans for the former KCC site that this somehow means the site can be used for other purposes is faulty (p. 60). Using that logic it can be argued that every parcel in the MAP which has no detailed, specific plan can be used for other (zoning) purposes.

11. We are aware that it is not the responsibility of UH or HCDA to create specific plans for school sites. IT IS THE RESPONSIBILITY OF HCDA TO RESERVE LAND FOR EDUCATION, especially this particular site (see previously cited sections of the MAP and HRS). I feel HCDA is not carrying out its duty with respect to this site. The HCDA was created in 1976 by the State Legislature to be capable of "long-range planning and implementation of improved community development" (HRS 206E).

12. The Hawaii State PTSA has taken a stand against the project and in support of saving the land for education.

13. I am unaware of any person or organization who feels the site should be used ONLY for McKinley High expansion. That has been but one suggestion. The prevailing view has been direct use for education, including UH's ETO and adult education (9/22/92 letter to HFDC for Draft EA from McKinley High PTSA, High School, and four area legislators, with which I concur).

14. The Hawaii State Plan says it shall be the policy of this State to "promote the preservation and restoration of significant...historic resources" [Section 12 (b)(1)].

15. The NBC/McKinley/KCC superblock is zoned "public" and has

16. The DEIS states that for an area zoned "public" the "adjacent zoning applies." It then claims the zoning across the street applies. However, according to the zoning section of the City's Dept. of Land Utilization, "adjacent zoning" means "touching," not "across the street from." In special cases where it means across the street from, it must be SPELLED OUT CLEARLY. Where is this uncommon definition of "adjacent zoning" spelled out (please specify, including page number)?

17. If it is presently zoned "public," can high-density, high-rise residential towers be built on it without re-zoning or some sort of special permit?

18. The Alapai-Sheridan Special Area has general height limits of 150 feet. It is bounded by King, Alapai, K-1, Punahou St., Makiki Drainage Ditch, Kapiolani Boulevard, and Pi'ikoi St. Its heights are lower than the proposed residential towers and it is not even adjacent to McKinley; it is across King Street, a wide thoroughfare.

19. Impacts on immediately adjacent uses. Resident-School compatibility. The SIA found that "resident-school compatibility is a problem," but tries to minimize it by stating the proximity "may" lead to incompatibility problems between Hale Kewalo and McKinley High School.

The proximity WILL INDEED lead to compatibility problems as evidenced by Iolani and Moanalua High Schools.

a. Iolani's experience.

Provisions in the rental agreement do not prevent residents from complaining. Despite the original lease agreement, high rise residents complained. According to school officials police officers would appear several times a day on some days to report of complaints. As one official sighed, signing a lease does not remove your First Amendment rights. Iolani has tried to be a good neighbor and at great expense air conditioned its gym to reduce the noise (although this is not good for the athletes), reduced the number of its all-school assemblies in the outdoor courtyard (no indoor area is large enough to hold the entire school), put a curfew of 10:30 p.m. on its dances, to the students' dismay. The swim team, like all good swim teams, had early-morning practices starting at 5:30; this caused complaints. (While McKinley High does not at present have a pool, it is hoped that sometime in the next 20 or so years one will be built. The 1991 master plan for McKinley says it should be in the PE complex near the gym and places it close to the Hale Kewalo site.) While Iolani discontinued its annual carnival because of its new synthetic track, McKinley has its popular carnival running two nights until midnight. Even though public

and private schools are now exempt from the noise code between 7 a.m. and 10 p.m., the carnival would not be exempted after 10 p.m.

Iolani's marching band and teams such as football arrive back on campus later than 10 p.m. and it is difficult to contain their exuberance after a game or program. School officials emphasized it is a minority of residents who complain. With over 600 apartments nearby, there are always a few. Nevertheless that minority creates problems for the school and students. The SIA's claim that these complaints will not "automatically terminate" related school activities may be true, but they certainly have an effect.

b. Moanalua High School's experience has also been only negative.

Even if authorized school activities are exempt between 7 a.m. and 10 p.m., high-rise neighbors complain because the marching band practices on the football field after football afternoons, usually 6:30-8:30 p.m. on weeknights, plus Sunday fertilizers and waters the grass.

Some of the complainers are verbally abusive toward the coaches, faculty, staff, and administrators, and this causes much stress, according to a school official. Moanalua has no swimming pool and no carnival and is thus saved from two sources of complaints.

For McKinley non-school-related activities such as the State Farm Fair would not be exempt and Hale Kewalo complaints may cause them to cease operations.

The experience of other schools points out that schools and nearby high-rise neighbors are basically incompatible. Just as hospitals are not built next to schools for the sake of both, so should high-rise apartments not be built next to schools for the sake of both.

Even SIA admits that the Hale Kewalo-McKinley High mix would be an optimal use of the land "PROVIDING that the various uses can operate compatibly." If they cannot operate compatibly, it follows that it is not an optimal use of the land. Comment by Letter 4: The SIA asserts that the "active opposition is mostly localized." I dispute this statement as I do the first paragraph of the "analysis" on page 59.

The "active opposition" includes some who are none of the things listed. They come near and far because they feel passionately that this would be a grave and permanent error greatly affecting McKinley High and public education. They

see the high school and public education as innocent victims of a university that is insensitive to lower education and a powerful governor and housing agency that want affordable housing no matter what the social and indirect costs.

b. Our supporters come from all walks of life. A present and former senator of different parties, an ex-governor, business people, high school dropouts, entertainers, athletes, professionals, even a legislator from a far-removed district. My letters or testimony supporting our position. The State PTSA has supported us for some time. At the recent PTSA Convention an emergency resolution supporting our position that educational land should not be removed from education was easily adopted. The major criticism of it came from neighbor islanders who said it was not worded strongly enough.

d. The thousands who signed our petitions at the fairs, shopping centers, and carnivals live all over O'ahu. It took very little convincing for people to sign. Whether people were related to McKinley or not they willingly, even eagerly, signed. There was one major group of people refusing to sign. They were university faculty, administrators, staff, consultants, and their families, among whom are some McKinley alumni who privately agree with our position. The vast majority of people, over 90%, who were informed about Hale Kewalo supported our views. I have previously been involved in community issues, sometimes controversial and other times not. Never before have I found such widespread, overwhelming support. Generally, on these other issues I have been involved in, the support has been 60-75%, a clear but not overwhelming majority.

e. Please note the number of plaintiffs obtained in our court suit last Dec. 8. These were obtained in two days. Had we had more time a greater number and people with more varied backgrounds could have been obtained. It took little persuasion because of the strong feelings against the project on this site.

f. SIA's reporting of the Ala Moana/Kaka'ako Neighborhood Board No. 11's failure to pass a motion to delay funding for Hale Kewalo until a public hearing was held implied little support for us. The vote was not reported. The vote was 4-2 in favor, with a UH professor and one member against. We were told after the meeting that the one member was very friendly with HCDA. The lone absent member had told me before the meeting of her support. The Board had two vacancies. Had there been full attendance or no vacancies the motion would undoubtedly have carried, a majority of the Board membership of nine being necessary rather than a majority of those voting.

g. BOE and DOE. I find the characterizations of the BOE as not taking a "formal position of objection or complaint," its "formal position of neutrality," and DOE's not taking an "explicit" position "regarding support or opposition" to be

distortions. (1) In a letter from BOE Chair Nakashima to BLNR Chair Paly, the BOE makes clear it was misled in agreeing to the 1/30/92 tripartite agreement for Building 857 and 50 stalls because BOE believed UH controlled the land. BOE not only rescinded that agreement but stated it would proceed to reclaim the entire parcel for educational purposes (5/22/92). (2) Describing the BOE as "neutral" because it did not join in the Dec. 8, 1992, suit against HCDA et al is rather far-fetched. BOE Chair Hartman explained that members did not want to be held personally liable for legal expenses by joining in the suit at that point. (Oshiro, Star-Bulletin 12/11/92). (3) In my response of 2/22/93 to the EISP, I did not state EXPLICITLY that I opposed the project on that site. But would any reasonably objective, unbiased person reading my comments and knowing that I was a plaintiff in the 12/8/92 court suit come to the conclusion that I was "neutral" or that I neither "supported nor opposed" the project?

21. Confusing McKinley Community School with McKinley High School.

a. McKinley High School is a day school for youths up to about age 18. Its PTA, principal, faculty, and Alumni Association have been actively involved in trying to prevent Hale Kewalo from being built on the former KCC-Pensacola site.

b. McKinley Community School is for adults age 18 and older, has classes in the evenings, daytime, and on Saturdays in locations outside of the McKinley campus as well as on it. Its principal and faculty have not opposed Hale Kewalo. The Community School is supposed to be the recipient of Building 857 and 50 parking stalls. Its position could be described as "neutral," ~~partially favorable to Hale Kewalo.~~

c. Both the High School and Community School are under the DOE.

22. Because the sub-consultant, consultant, and HCDA are unaware of or pretend to be unaware of the distinction between MHS and MCS, erroneous statements and inferences abound in the DEIS, the Negative Declaration, and the Environmental Assessment.

For example, the SIA declares Building 857 will meet the expansion needs of the High School because it will be conveyed to DOE. Plans have been, since 1991, for the use of 857 by the Community School on a permanent basis. 857 is being used TEMPORARILY by the High School due to the hazardous and unsafe condition of the Administration Building. When renovation of Building A, the Admin Building, is completed, 857 will revert to the Community for its long-term, permanent use. In its 3/29/93 reply to Rep. Thielien, HCDA informed her that McKinley High will have 40,000 square feet in Building 857 potentially available for use by the school if Hale Kewalo is built.

23. McKinley High is at capacity. Even before Building A became unsafe for classroom use a few months ago, there were teachers without their own classrooms. The principal says if there isn't room, she will have to stop accepting geographic exceptions. She would prefer to have the GE's. This will prevent students from outside McKinley's district from attending the Humanities Learning Center, the Business Learning Center, and the new Finance Academy, special programs available only at McKinley High. This will defeat the concept of "magnet" schools. This is contrary to the Education Functional Plan of the Hawaii State Plan, to "ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs (A(4)). It is also inconsistent with the Hawaii State plan which declares, "the greatest aid to increased self-sufficiency for our present and future generations is education" (Page 15).

24. According to the SIA, "In the expansion plans for McKinley High School, there is a proposal to add another academic building between Building A and the cafeteria. This new building would include almost 27,000 square feet. If the new building is built as planned, Building 857 would greatly exceed the projected space needs" (p. 60). For the record, some of this has already been built: two-thirds of the new library has been built as have some of the classrooms below it. I invite the sub-consultant (and consultant) to visit the McKinley campus and also research building permit records so a more accurate SIA can be done. HCDA based its 3/29/93 reply to Rep. Thielien on this partly incorrect statement.

25. Traffic.

a. Regarding peak-hour traffic in the morning and evening, I find HCDA's 3/29/93 response to me unsatisfactory. The "trip generation rate" for only the "affordable" units in the Pava'a Superblock project is 29-30% in the morning peak hour and 32% in the evening peak hour. This compares with 21% and 23% for Hale Kewalo. The 1073 "affordable" units in Phases I and II of Pava'a produce 315 (29% of 1073) vehicles entering and exiting during the morning peak hour and 346 (32% of 1073) vehicles entering and exiting during the evening peak hour. This is with an on-site day care center (residents need not drive to the babysitter), an on-site K-2 school (again, students will walk rather than be driven to school), and an on-site major market such as Foodland, reducing the need for auto trips for grocery shopping, something I often did after dropping off my child at school when my children were young. Yet Hale Kewalo, without these on-site amenities to reduce the number of auto trips, has lower trip generation rates than Pava'a: 21% (1107530) and 23% (1207530) compared to 29% and 32% for Pava'a. It makes no sense.

b. Also, the realities of life on O'ahu are that faculty members whose CLASS schedules would allow them to avoid the a.m. and

p.m. peak hours still have office hours, faculty meetings, research, and FAMILY responsibilities which won't.

26. Temporary adverse effects and mitigation measures.

- a. Regarding temporary noise and dust effects during construction: Why will air conditioning classrooms only be "considered to reduce noise impacts"? The statement should be: "Will be provided."
- b. And why are noise effects only being considered during pile-driving? During the entire construction period noise and dust will be created. Health and PE classrooms are very close to the construction site.
- c. Will adverse effects of noise and dust on school offices be mitigated? Shouldn't they be?
27. Many of my comments have been directed at the Social Impact Assessment. It was done very quickly, perhaps too quickly, apparently between Dec. 1992 and March 1993 and shows signs of haste. There are many careless minor errors, a few of which I will note. There are other, more serious, errors (such as confusing McKinley Community School with McKinley High School which I described on a previous page) and/or some distortions due to insufficient research or lack of in-depth, more critical examination of issues, resources, and references. I wish the sub-consultant had been given more time to do an adequate job.

28. The SIA says the UH ETO is "currently" operating on-site (the SIA was prepared March 1993). Following page II-10 and Fig. VII are photos. The caption of the fourth photo reads: "A concrete two-story building presently used by ETO. To be demolished." My understanding is that the ETO vacated the site last summer (1992). 29. The SIA describes Sub Area 4 as "bounded by Beretania Street." This conflicts with the map in Fig. A. and the first paragraph of 2.1. Which is correct?

30. The SIA says Building A "currently houses McKinley High School's auditorium and some classrooms." It makes no mention of administrative offices.

31. On page 38 the SIA describes a "church and school complex" on Pensacola near King Street. "School" implies an elementary school. Isn't it only a pre-school? If so "pre-school" should be specified.

32. On page 45 McKinley's service area is said to include Mo'ili'ili. I think it has been some years since that was so. It is now in Ka'imuki High's area.

33. How has each of the parties mentioned in my 2/22/93 comment on the EISP been given the opportunity to participate in the

EIS process? Were letters sent to them? Publishing a notice in the DEIS Bulletin hardly qualifies as being given the opportunity if they don't know about it. The Bulletin is not something the ordinary person, even an informed, educated person would read or think of browsing through.

34. In HCDA's 3/29/93 reply to me, No. 1 says HCDA is also "offering additional support." What specifically does this mean?

35. I do not understand why 2.2 persons per household was used as an upper limit for this project when the MAP states it expects a population of 47,500 residents in 19,000 units at full buildout, for an average of 2.5 persons per unit. Please explain/justify the 2.2.

36. The figures in the last column of Table 11 on page 49 puzzle me. How were they arrived at? When I used the multipliers given in Note (3) I obtained 85, 11, and 32 for a total of 128 by multiplying 530 apartments by .16, .02, and .06.

37. UH Faculty Housing Tower.

One of the primary purposes of this project is to address UH's need to recruit and retain top-notch faculty by designating one tower of housing for UH faculty."

a. UH Faculty Housing Assistance Master Plan January 1991.

In January 1991 the UH Board of Regents adopted the University of Hawaii Faculty Housing Assistance Master Plan, as prepared by KPHG Feat. Harvick and dated 1/91. For the rental housing portion of it, the University is to build a high-rise apartment building with one-, two-, and three-bedroom apartments with amenities including a day care facility. This program would focus on new appointees and secondarily on already employed faculty. A large number would be short-term rentals until faculty's needs and incomes permit them to buy condos or single-family homes. Also accommodated would be short-term appointees such as research personnel or visiting faculty. Units would be available for long-term rental to faculty who have no desire to own. Units not occupied by faculty would be offered to married UH students and/or staff. A sample project plan would consist of 80 one-bedroom units of 700 square feet, 110 two-bedroom units of 1,000 square feet, and 60 three-bedrooms of 1,300 square feet, for a total of 250 units (V. 1, pp. 23-24).

b. The Hale Kewalo UH Faculty Tower apartments do not, for the most part, implement the housing consultant's recommendations. The units are much smaller than recommended: about 30% are studios which were never recommended by the consultant (note for comparison that Pawa's Redevelopment project is planning studios ONLY for the elderly. Hawaii Housing Authority, for low-income housing, builds studios ONLY in elderly

May 26, 1993

Ms. Amy Kimura
1310 Heulu Street, Apt. 1002
Honolulu, HI 96822-3050

Dear Ms. Kimura:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)

Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 21, 1993 commenting on the subject Draft EIS. We appreciate your comments on the Draft EIS and will address each item in terms of its validity, significance and relevance to the environmental review process. On a general note, based on the overall argumentative tone of your comments, we feel it is important to stress that neither the agencies nor the consultants have used this EIS to advocate any viewpoint regarding the project. Rather, all parties have made a concerted effort to examine all sides of the issues and to present findings which are based on an objective analysis. While these findings may not be consistent with your own opinion, they are in fact the result of studies conducted to fully explore the various impacts, positive and negative, of the Hale Kewalo project. We offer the following responses in the respective order of your comments:

1. The level of project detail available when an EIS is prepared varies from project to project. Section 11-200-17 (e) (Administrative Rules, DOH) states that the project description in the Draft EIS "need not supply extensive detail beyond that for evaluation and review of the environmental impact." The available project description was sufficient to assess environmental impacts of the Hale Kewalo project.

2. With respect to alternative sites, the Draft EIS emphasizes that the proposed site is unique in its



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Commissioner

Michael N. Szafron
Assistant Director

427 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813
Telephone:
(808) 567-2070
Facsimile:
(808) 567-2611

May 22, 1993

Hale Kewalo DEIS

projects.) One bedroom are the smallest units recommended by the consultant even for the high-rise apartment building.

The types, numbers, and sizes of units in the UH Tower are as follows: 78 studios ranging in size from 410 to 473 square feet; 84 one-bedrooms 556 to 582 square feet; 90 two-bedrooms 706 square feet; and six three-bedrooms 863 square feet. As can be seen, these units are so much smaller than recommended, it will be difficult to retain young mainland faculty. At the University of Massachusetts at Amherst, for example, (also a state university like UH) a young single junior-level professor gets a two-bedroom to rent.

The income limits at Hale Kewalo are such that those who qualify for the rentals are unlikely to be able to afford to buy an adequate condominium on O'ahu, much less a house without massive subsidies from UH and/or Mom and Dad. At the time of the consultant's study, 1990, housing prices were very high; they skyrocketed in the following two years. It has become even more difficult for the various housing assistance programs recommended by the consultant to help very many today. The gap has grown too great.

38. Under Long-Term Commitment of Land, Irreversible and Irrecoverable Commitment of Resources, I find incomplete the statement, "if the need for faculty housing declines, then both towers could be used for general rental housing." Where in the DEIS is it stated the Board of Regents decided, based on the housing consultant's recommendation, that other UH and community college employees and married and/or graduate students would have priority over the general public?

NOTE: CAPS in quoted material are mine.

Thank you for this opportunity to comment on the DEIS. I hope you will be able to respond satisfactorily to my concerns and questions.

Please send me a copy of the Final EIS.

Sincerely,
Amy Kimura
Amy Kimura
McKinley High parent

cc: Mr. Eric Masutomi, Hawaii Community Development Authority
Mr. Earl Matsukawa, Wilson Okamoto and Associates, Inc.

Given the foregoing, we do not believe that a site-by-site analysis or an alternative-by-alternative analysis toward achieving the collective objectives of the project would be feasible or appropriate. Ms.

3. The Draft EIS discusses the dilemma posed by the high demand and limited opportunities for building affordable housing in the urban core for CONSIDERATION by decision makers. The decision to REJECT a site for such housing is separate from the EIS process.

4. Thank you for pointing out this error. The referenced information presented in the Social Impact Assessment was indeed based on an unpublished study undertaken by HFDC. The Social Impact Assessment will be revised accordingly prior to its inclusion in the Final EIS. Meanwhile, per your request, we will be sending you a copy of the inventory under separate cover with the understanding that it is being utilized by the staff as an internal working document to pursue the development of potentially feasible sites for affordable housing.

5. The statement in the Draft EIS regarding the lack of "definitive plans" on the part of the DOE is merely a statement of fact. Without additional information, no further explanation of the "Alternative Use" can be provided.

6. The EIS discloses and addresses the various concerns regarding potential impacts of the proposed Hale Kewalo project on McKinley High School, including its historic resources. You are certainly entitled to your opinion that it is not sensitive to these concerns.

7 & 8. The reference you cite is not a "mandate," but and rather one of nine development guidance policies

ability to address multiple community-based housing, education and recreation needs. High land acquisition costs already limit the range of feasible alternative sites for affordable and faculty housing to available State- and University-owned land.

The highly constrained situation with respect to affordable housing is discussed in Chapter V, Section C. *Impact on the Supply of Affordable Housing*, and in the Social Impact Study (Appendix E). The site is one of only six State-owned sites within the urban core that have been determined to be feasible for development of moderate to high density affordable housing projects. Given the crucial need for housing, particularly in the urban core, each of these sites presents an important opportunity that must be seriously pursued. It is not an either/or proposition.

The situation with respect to faculty housing is discussed in Chapter V, Section D. *Impact on the Supply of Faculty Housing Units*, and in the Social Impact Study (Appendix E). In implementing the *UH Faculty Housing Assistance Master Plan*, the University identified only three suitable sites, two in the urban core: the proposed site and another in Manoa near Noelani Elementary School. Plans are proceeding for the development of faculty housing at both locations. The third yet-to-be identified site is in West Oahu and would be developed in the future in conjunction with the proposed second campus in Kapolei.

In addition to accommodating both affordable and faculty housing, the proposed project site will create a new park/open space at the corner of Pensacola Street and Kapiolani Boulevard. It will accommodate most of the former and existing ETO functions and will retain the existing Building 857, enabling additional space to be made available for use by the Department of Education.

Ms. Amy Kimura
Page Five
May 26, 1993

recognized in the Social Impact Assessment, without (a regional assessment of educational impacts), it is difficult to formulate a plan for accommodating the planned growth in the Study Area. Such a comprehensive plan is needed regardless of the status of Hale Kewalo so that each of the proposed residential projects can be reviewed within the context of a regional educational plan, rather than on a case-by-case basis.

The comments on the Pawaia redevelopment project would be more appropriately directed to the DOE since the Draft EIS is intended to address concerns of the Hale Kewalo project only. The answer to your question regarding where the Pawaia redevelopment project on-site K-5 students will go to school can be found on page 48 of the SIA, which explains that students will attend Kaahumanu Elementary.

We acknowledge that Hale Kewalo and Pawaia are only two of the various proposed projects.

Regarding multi-track year-round schools, we agree that it cannot solve "all overcrowding." That is only one of five possible strategies identified by the DOE to "maximize the use of existing school facilities" (page 10 of DOE report).

Your reference to the quote from the SIA, p. 60, "DOE has no specific plans for the former KCC site" is made out of context and is irrelevant to the referenced analysis. The discussion is part of Section 5.3.1., *Competition between the Proposed Project and Educational Needs*, where the background on this particular issue was presented and analyzed, leading to the finding that inaccurate assumptions are being made regarding control of and future plans for the project site.

Ms. Amy Kimura
Page Four
May 26, 1993

included in Section 206E-33, HRS. Nonetheless, the Hale Kewalo project is not inconsistent with this guideline or with HCDA's Mauka Area Plan (Note: A discussion of the project's relationship to the Mauka Area Plan is included in the Final EIS in Chapter IV, *Relationship to Plans and Policies*). While the Mauka Area Plan recognizes the potential value of the site for educational purposes, it in use of the site for housing, recreation and no way suggests that the site should be restricted exclusively for such uses. The HCDA is committed to achieving the full range of objectives and policies stated in the Plan. The proposed mixed-education serves to ensure that this valuable public resource is most effectively utilized to address the broadest range of public needs. Moreover, when interpreting the Mauka Area Plan, it is important not to overlook its basic intent and purpose. As stated on page 5 of the Plan:

The Mauka Area Plan provides a framework for district-wide community development and improvements over the next twenty years or until the year 2012, and serves as a decision-making tool to guide public and private sector actions in the revitalization of the Mauka Area. (emphasis added)

The residential population figures that you have drawn from the Mauka Area Plan represent "order of magnitude" projections based on the potential maximum build out of the District. As noted on page 111, *Cost-Benefit Analysis*, of the Plan and reiterated in Section 3 of the Social Impact Assessment, the probable amount of development which could be achieved in the Mauka Area is much less. Current trends support this position; our latest projections indicate a likely 2010 population in Kakaako of 22,700 generating approximately 900 students (grades K-6: 569; 7-8: 115; and 9-12: 228), based on DOE estimates. Whether or not new school facilities will be needed in twenty years to accommodate this magnitude of growth remains debatable since projected demand from anticipated growth in Kakaako still needs to be reconciled with related information on future demand outside of the Kakaako District. As

CORRECTION

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

recognized in the Social Impact Assessment, without (a regional assessment of educational impacts), it is difficult to formulate a plan for accommodating the planned growth in the Study Area. Such a comprehensive plan is needed regardless of the status of Hale Kewalo so that each of the proposed residential projects can be reviewed within the context of a regional educational plan, rather than on a case-by-case basis.

9. The comments on the Pavaa redevelopment project would be more appropriately directed to the DOE since the Draft EIS is intended to address concerns of the Hale Kewalo project only. The answer to your question regarding where the Pavaa redevelopment project on-site K-5 students will go to school can be found on page 48 of the SIA, which explains that students will attend Kaahumanu Elementary.

We acknowledge that Hale Kewalo and Pavaa are only two of the various proposed projects.

Regarding multi-track year-round schools, we agree that it cannot solve "all overcrowding." That is only one of five possible strategies identified by the DOE to "maximize the use of existing school facilities" (page 10 of DOE report).

10. Your reference to the quote from the SIA, p. 60, "DOE has no specific plans for the former KCC site" is made out of context and is irrelevant to the referenced analysis. The discussion is part of Section 5.3.1., *Competition between the Proposed Project and Educational Needs*, where the background on this particular issue was presented and analyzed, leading to the finding that inaccurate assumptions are being made regarding control of and future plans for the project site.

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At no time does the SIA imply that the lack of plans for the site "means the site can be used for other purposes..." Instead, the SIA notes that there is an expectation by some project opponents that the site be returned to the DOE as if there were plans for the site. The SIA then points out that there are no plans for the site. As such, to suggest that the SIA in any way infers that "every parcel...which has no detailed, specific plan can be used for other (zoning) purposes" is totally inappropriate.

11. With respect to your concerns regarding HCDA's responsibilities, please refer to our response to item Nos. 7 and 8.

12. We acknowledge the position taken by the Hawaii State PTSA.

13. We are confused as to the purpose of this comment. We clearly state that opposition to the project stems from a belief that control of the site should revert back to the Department of Education, as discussed on page 58.

14. In their letter of May 12, 1993, the State Historic Preservation Division, commenting on the Draft EIS states: "The DEIS correctly identifies potential adverse effects of the project on historic sites, including the McKinley High School Campus and possible buried sites that would be significant for the information on Hawaiian history and prehistory that they contain. The DEIS also makes a commitment to gather information needed to determine the effects of the project and to mitigate any adverse effects that are identified." Based on this position by the agency empowered to review the impacts of State projects on historical resources, we can identify no conflict with the Hawaii State Plan policy you cited.

15. HCDA's Mauka Area Rules do not establish a height limit of 60 feet for the site.

16. The City Department of Land Utilization's definitions are limited in application to the City's Land Use Ordinance. They are not interchangeable with terminology utilized in HCDA's Mauka Area Rules.

17. As we have indicated to you in prior correspondence, and as is stated in Chapter IV, Relationship to Plans and Policies, of the Draft, the site is subject to the provisions of the adjacent MU2-R designation. Under this and other mixed-use zone classifications, proposed developments exceeding heights of 45 feet and/or a floor area ratio of 1.5 may be allowed subject to receipt of a Planned Development Permit. A listing of this and other required approvals for the project will be included in the Final EIS.

18. The Alapai-Sheridan Special Area was mentioned in the SIA to provide general context regarding nearby areas with special land use controls. No references were made to it regarding potential relationships to the Hale Kewalo project.

19. The SIA acknowledges that the proximity of schools and residences presents problems, and Section 4.4.1 (pp. 42-4) deals with this impact fully. However, no determination was made that schools and nearby high-rise residences are "basically incompatible." While hospitals, to cite your example, may require very low noise levels, residences do not. If there were such requirements, public policies would certainly prohibit the development of high-rises near schools. Instead, public policies clearly allow schools to undertake their normal activities during certain hours. The SIA emphasizes that school officials may handle noise complaints at their own discretion.

Under current law, no body is permitted to engage in activity which produces excessive noise. If the activities to which you refer generate such noise, their organizers are required to obtain approval in writing from the Department of Health, with or without Hale Kewalo. The project will not cause the termination of non-school-related activities.

23. This comment assumes that the Hale Kewalo project site was intended for the expansion of the McKinley High School campus, and that expansion of the campus is needed. Neither of these assumptions has been established.

24. We are aware that portions of the Academic Core Facilities have been completed. This does not detract from the central point, which you obviously do not dispute, that through the conveyance of Building 857 to the DOE, the project will provide an additional 40,000 square feet potentially available for use by the school -- over and above the 35,000 square feet of new space proposed under the McKinley High School Campus Development Report.

25a. Your comparison of trips generated is in error because you cite a figure representing both the total trips into and out of the Pawaia project, while the figure cited for the Hale Kewalo project represents total trips in only one of those directions. We also note that the trip generation rates established by the Institute for Traffic Engineering for larger complexes, such as the Pawaia project, is slightly lower than for smaller projects, such as Hale Kewalo.

25b. The traffic study is based on a "worst case" assumption that all faculty members have commuting habits identical to the rest of the population. In our comment to you on this matter, we were simply pointing out that peak hour trips generated by faculty members could be lower than predicted in the traffic study since some faculty members may be able to avoid these peak hours.

26a. Depending on the construction schedule, noise impacts on classes can be avoided by conducting noisier activities when classes are not in session, i.e. during school vacations. Thus, the need for air conditioning could in turn possibly be avoided.

20a-e. Regarding the SIA assertion that the "active opposition is mostly localized", we assume you are referring to the discussion on Page 59, which is part of Section 5.2.1, "Competition Between the Proposed Project and Educational Needs." We maintain that active opposition, as differentiated from passive supporters of your position, is mostly localized. The impetus for project opposition continues to originate within groups directly related to McKinley High School, presumably because the issue focuses on the relationship between McKinley High School and Hale Kewalo. The petition and lawsuit are generated by school-related groups and individuals.

20f. Regarding the position of the Ala Moana/Kakaako Neighborhood Board, No. 11, the SIA accurately presented the results of the February 1992 meeting. That is, that the Board's motion failed; the actual vote was irrelevant to the discussion in the SIA. Further, to include hearsay, such as "one member was very friendly with HCDA," would be sanctioning irresponsible reporting on our part.

20g. Regarding the BOE and DOE positions, terms such as "formal position" are used to characterize positions resulting from voting. The SIA accurately reported BOE positions in a chronological manner on pages 55 and 56. In terms of the DOE position, we note that the DOE stated its opposition in September 1992, and most recently, expressed a preference for the no-action alternative.

21. We and our consultants are very much aware of the and distinction between McKinley High School and 22. McKinley Community School for Adults. As you point out, both operations are under the DOE. Unfortunately, you illogically fail to recognize that the manner in which space in Building 857 is ultimately to be utilized and allocated rests solely with the DOE, and that it is entirely within DOE's purview to grant use of Building 857 to the high school if it deems appropriate. We stand by our prior statements on this matter, as well as the attendant information conveyed in the Social Impact Assessment.

26b. Dust emissions must be controlled by the construction contractor throughout the construction period to comply with Department of Health regulations. Construction noise shall be controlled to comply with DOE standards. Additional noise studies may be required to determine specific mitigation measures. The Final EIS will be revised to clarify this.

26c. School offices will be subject to the same noise and dust considerations as classrooms; no distinction was intended. The Final EIS will be revised to clarify this.

27. Notwithstanding your right to confer judgement on any aspect of the Draft EIS, we certainly take exception to your comments pertaining to the quality of the SIA. Regardless of the time frame in which the report was completed, the SIA reflects the results of thorough research and thoughtful and professional analysis. As our responses to your comments demonstrate, many of your assertions regarding "errors" or "distortions" are more often than not the result of items being taken out of context, unfounded assumptions regarding what HCDA or its consultant is or is not aware of, or simply trivial. Unfortunately, such comments only detract from the substantive analysis contained in the SIA.

28. The photograph was taken in April 1992, and the caption was prepared in the same month. At that time, the ETO was occupying the structure. We will revise the caption in the Final EIS to reflect its current status.

29. We appreciate your pointing out this minor error; it will be corrected in the SIA appended to the Final EIS.

30. The acknowledgement of administrative offices in Building A has no substantive bearing on the SIA analysis.

31. Page 38 of the SIA describes the surrounding neighborhood in detail. Clarification between a school and a pre-school would not affect the findings of this section.

32. The reference to Mo'ili'ili being included as part of McKinley High School's service area on page 45 of the SIA was derived from materials provided by the DOE.

33. As stated in our previous response to you, the Environmental Assessments, EIS Preparation Notice, and Draft EIS were prepared in compliance with all requirements for public notification and review pursuant to Chapter 343, HRS. Thus, the parties you mentioned have been given the opportunity to participate in the EIS process.


34. At the time of our earlier response, HCDA was in the process of finalizing arrangements -- with DOE, the McKinley High School administration, and the State Department of Accounting and General Services -- for the provision of temporary classroom/office space on the McKinley campus. This was to be accomplished through the purchase of new trailers or the rehabilitation and relocation of selected KCC portables. In order to assure the availability of the units by the start of the new school year, HCDA had proposed to coordinate and underwrite the cost of the effort, with the possibility of reimbursement should funds for the renovation of Building A become available. Although this offer was initially accepted in principle, instigating the preparation of preliminary plans, it was later rejected by the school with no further explanation provided.

35. The ratio of 2.2 persons/household is a refinement of the original standard, based on historical data and current trends. While HCDA's Residential Standards Study (3/14/80) estimated the median household size for Kakaako and urban core dwellings at 2.0 and 2.1, respectively, the more liberal 2.5 figure was used in the Plan to establish the maximum build out parameters for the District (see our earlier response to item Nos. 7 and 8). Our ongoing review of actual densities experienced in Kakaako over the past ten years has demonstrated that the 2.2 ratio is a more accurate factor for use in projecting future residential population in the District.

Amy Kimura
Page Thirteen
May 26, 1993

Your letter, together with this response, will be included in the forthcoming Final EIS, a copy of which will be distributed to you. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,


Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

Amy Kimura
Page Twelve
May 26, 1993

36. The estimated student enrollment projections presented in the Social Impact Assessment discounts the 78 studio units proposed in the project, based on our original understanding with the DOE that these units were not to be factored into the calculations due to their negligible impact. The DOE has since indicated that the studio units should be included in the projections. Although the resultant differential is small, we will be identifying this matter as an unresolved issue in the Final EIS.

37. The UH Faculty Housing Assistance Master Plan is a guide for accommodating faculty housing needs. As discussed in our previous response to you, larger residential units in Hale Kewalo would have been desirable. However, the realities of construction costs and land availability in Hawaii dictate what is feasible for affordable units. The proposed units are in line with Hawaii standards.

There are a number of reasons why faculty may be attracted to Hawaii, including the nationally renowned programs offered as well as amenities such as the climate and social/cultural setting. Finding affordable housing is a deterrent which the proposed project addresses. The type of housing offered was never intended to serve as the sole "attraction."

Market conditions vary over time. At any given time, certain assistance strategies may seem more favorable than others. Hale Kewalo is viewed as a long-term contribution toward addressing the faculty housing dilemma.

38. You are, again, misreading a statement. It is clearly established in a previous section of the Draft EIS that, as currently proposed, one tower will be dedicated for use by UH faculty while the other will be available to the general public. If, in the future, the need for faculty housing declines, portions or all of our faculty tower could be made available for general rental housing.

A note from KENNETH S. OKUMA

5-21-93

Gentlemen:

Enclosed are my reasons for opposing the Hale Kaula Housing Project which were not fully addressed in the EIS.

Makalo,
Kenneth S. Okuma
McKinley

AUTHORITY?

VIEWPOINT - My Kessie in Office RECEIVED

98 MAY 25 1993 8 44
The current controversy surrounding the plans for two high rise apartment buildings on the campus of McKinley Community High School has elicited intense opposition on the part of students, staff, alumni, legislators, friends of the school and community leaders.

They claim that historically and documented evidence show that the grounds formerly deeded to the school shall be utilized for educational programs. The Department of Education permitted the use of a portion of the campus to the then Kapiolani Vocational School, still a part of the DOE.

With the advent of the Community College System, it came under the supervision of the University of Hawaii. Subsequently the Kapiolani Community College, cramped for space, was relocated to the Diamond Head area. The vacated space was then supposedly reverted to McKinley High School for their use to accommodate the projected increase enrollment (Kakaako Redevelopment Area) and expansion of educational programs.

Abruptly and without any formal hearing, it was announced that two high rise apartment buildings would be built "smack" on the campus. Imagine what this would do to the on-going school activities. (e.g. ~~McKinley High School, Kapiolani Community College, etc.~~)

Ian I. Harris
1344-A Alewa Drive
Honolulu, Hawaii
96817
21 May 1993

Hawaii Community Development Authority
The State Of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
ATTN: Eric J. Masutomi

Dear Sirs/Madams,

Re: Hale Kewalo Rental Housing Development
Draft Environmental Impact Statement
Tax Map Key : 2-3-09:1
Honolulu, Oahu, Hawaii

I am a resident and taxpayer of the City and County of Honolulu and of the State of Hawaii and herewith respectfully offer my comments on the subject project. The draft Environmental Impact Statement (EIS) is deficient in responding in detail to several important points previously raised in the many letters of comment in response to the Environmental Assessment (EA). Request that you address the following in the EIS:

1. The history and land use of the project site was not addressed in context with the original parcel of land deeded to McKinley High School, of which it was originally part and parcel. The EIS should address the original intent and purpose, together with the zoning, of the school lands including a chronological history of land ownership and land use of the 5 acre project parcel to, and including, the executive order of transfer. Although this is not an environmental issue it does provide a necessary introduction to environmental issues raised by others in the EA.
2. The EIS should expand in detail, discussion of all alternate housing sites studied for the Hale Kewalo project, and provide justification for rejection of each. Discussion should include the proposed University of Hawaii's own housing initiative on lands that they own in Manoa Valley and why the faculty housing cannot be constructed adjacent to the university.
3. The EIS should expand upon and fully address the need and apparent urgency for the Governor's action prompting the executive order transferring the land rather than utilizing normal channels allowing public input. Though this issue is political rather than strictly

environmental, it creates the appearance of a closed policy in overall site selection which directly affects the impact of the project by limiting options for land use to housing only; or creates that appearance. As the selection of the project site on the former Kapiolani Community College site outweighs other sites alluded to in the draft EIS, it is at the core of all environmental concerns.

4. There was little discussion of the long term needs of public education in the McKinley school district, leaving that discussion up to the Board of Education. This concern is real and affects project site selection in that the land could be better utilized for long term land banking for education. The EIS should consider and discuss educational land uses as a viable option to the proposed housing development by projecting the districts school needs to at least the year 2010, a scant 16-1/2 years off. The environmental consequences of not land banking this prime site for educational purposes is dire, given the fact that McKinley High School is now operating beyond capacity. Housing is needed, but can always be sited elsewhere whereas schools cannot.

Sincerely,

Wilson Okamoto

Copy to:
Housing Finance and Development Authority
Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.



HAWAII COMMUNITY
DEVELOPMENT AGENCY



KAKAIAKO
Hawaii's Most Vibrant Coastline

John D. Walsh
Chairman

Gary Caulfield
Chairman

Michael N. Scordino
Chairman

Ref. No.: PL GEN 1.15b.2

May 26, 1993

Mr. Ian I. Harris
1344-A Alewa Drive
Honolulu, HI 96817

Dear Mr. Harris:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Draft Environmental Impact Statement
(Draft EIS)
Tax Map Key: 2-3-09: 1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 21, 1993 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. We concur that the land use and ownership history of the project site is not an environmental issue but disagree that it would somehow elucidate environmental issues raised by others. The Social Impact Assessment (Appendix E) addresses community issues related to the project.
2. With respect to alternative sites, the Draft EIS emphasizes that the proposed site is unique in its ability to address multiple community-based housing, education and recreation needs. High land acquisition costs already limit the range of feasible alternative sites for affordable and faculty housing to available state- and University-owned land.
The highly constrained situation with respect to affordable housing is discussed in Chapter V, Section C. Impact on the Supply of Affordable Housing, and in the Social Impact Study (Appendix E). The site is one of only six State-owned sites within the urban core which were found to be potentially feasible for development of moderate to high density affordable housing projects. Given the crucial need for housing, particularly in the urban core, each of these sites presents an important opportunity that must be seriously pursued. It is not an either/or proposition.

Mr. Ian I. Harris
Page Two
May 26, 1993

The situation with respect to faculty housing is discussed in Chapter V, Section D. Impact on the Supply of Faculty Housing Units, and in the Social Impact Study (Appendix E). Upon implementing the UH Faculty Housing Assistance Master Plan, the University identified only three suitable sites, two in the urban core: the proposed site and another in Manoa near Noelani Elementary School. Plans are proceeding for the development of faculty housing at both locations. The third yet-to-be-identified site is in West Oahu and would be developed in the future in conjunction with the proposed second campus in Kapolei.

3. Sections 5.2 and 5.3 of the Social Impact Assessment (Appendix E of the Draft and Final EIS) do provide a more detailed discussion of issues related to the conveyance of control of the project site to the HCDA. It should be pointed out that, contrary to your statement, the executive order (EO 3567) does not limit use of the site to housing purposes. A closer review of the Draft EIS will reveal that in addition to housing, the project also includes significant public education and recreation components. Moreover, the provision of affordable housing for the general public and UH faculty at the former KCC site is not being pursued at the expense of, but rather in addition to, the limited number of other urban core sites determined to be potentially feasible for development.

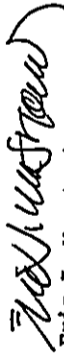
4. As indicated in Section 3 of the Social Impact Assessment, our latest projections indicate a likely 2010 population in Kakaako of 22,700 generating approximately 900 students (grades K-6: 69; 7-8: 115; and 9-12: 228), based on DOE estimates. Whether or not new school facilities will be needed in twenty years to accommodate this magnitude of growth remains debatable since projected demand from anticipated growth in Kakaako still needs to be reconciled with related information on future demand outside of the Kakaako District. As recognized in the Social Impact Assessment, without "a regional assessment of educational impacts," it is difficult to formulate a plan for accommodating the planned growth in the

Mr. Ian I. Harris
Page Three
May 26, 1993

Study Area. Such a comprehensive plan is needed regardless of the status of Hale Kewalo so that each of the proposed residential projects can be reviewed within the context of a regional educational plan, rather than on a case-by-case basis. The Final EIS does identify use of the site for educational purposes as an alternative. At the same time, it is not possible to illuminate on this option since the DOE has no specific plans at this time. Given the foregoing, there is insufficient information to support your contention that the consequences of not land banking the site for educational purposes is "dire," particularly in the face of known, critical competing public demands. Further, we disagree with your comment that housing "can always be sited elsewhere." As indicated in our comment No. 1, the opportunities for affordable housing projects are extremely constrained.

Your letter, together with this response, will be included in the Final EIS. We appreciate your interest and participation in the consultation phase of the environmental review process.

Very truly yours,



Eric J. Masutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WOA

PREPARERS OF THE EIS

PROPOSING AGENCY

Hawaii Community Development Authority (HCDA)

Director of Planning
Development Director
Planner

Eric Masutomi
Cleighton Goo
Susan Tamura

EIS CONSULTANT

Wilson Okamoto and Associates, Inc.

Project Manager
Planner

Earl Matsukawa
Allison Fritts

TECHNICAL STUDIES

Anbe Aruga and Ishizu Architects
Cultural Surveys Hawaii
Dames & Moore
Earthplan
Edward K. Noda and Associates, Inc.
Walter Leong and Associates
Wilbur Smith and Associates
Y. Ebisu and Associates

REFERENCES

Hale Kewalo

Rental Housing Mixed-Use Development

References

Anbe, Aruga and Ishizu, Architects, Inc. An Archaeological Assessment of a 5.33-Acre Parcel in the Kapi'olani Business District, Honolulu, Island of O'ahu (TMK 2-3-09: portion 01). Prepared by Cultural Surveys Hawaii. April 1992.

Anbe, Aruga and Ishizu, Architects, Inc. Estimate of Coastal Flood Elevation: UH-Kakaako Project. Prepared by Edward K. Noda & Associates, Inc. April 1992.

Anbe, Aruga and Ishizu, Architects, Inc. Pile Driving Noise and Vibration During Construction; Hale Kewalo Project. Prepared by Y. Ebisu and Associates. August 1992.

Walter Leong & Associates. Pile Driving Noise and Vibration: Hale Kewalo Project. Prepared by Dames & Moore. August 1992.

Hawaii Community Development Authority. Hale Kewalo Rental Housing Mixed-Use Development: Final Environmental Assessment/Negative Declaration. Prepared by Wilbur Smith Associates. October 1992.

Hawaii Community Development Authority. Hale Kewalo Traffic Study. Prepared by Wilbur Smith Associates. May 1992.

Hawaii Community Development Authority. Mauka Area Rules: Kakaako Community Development District. February 1990.

Hawaii Community Development Authority and US Department of Housing and Urban Development. Final Environmental Impact Statement for the Kakaako Community Development District Plan. June 1983.

Department of Accounting and General Services, State of Hawaii, and Architects Hawaii, Ltd. Environmental Impact Statement Preparation Notice: Family Court Center, Honolulu, Oahu. Prepared by Wilson Okamoto & Associates, Inc. April 1991.

State of Hawaii Department of Business, Economic Development and Tourism. The State of Hawaii Data Book 1991: A Statistical Abstract. Honolulu, Hawaii. November 1991.

State of Hawaii Office of the Governor, Office of State Planning. The Hawaii State Plan Chapter 226, Hawaii Revised Statutes 1988.

Hale Kewalo
Rental Housing Mixed-Use Development

References

United States Department of Agriculture Soil Conservation Service. Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii. In cooperation with the University of Hawaii Agricultural Experiment Station. August 1972.

United States Department of Commerce Bureau of the Census. 1990 Census of Population and Housing: Census Tracts. 1992.

Wilson Okamoto & Associates, Inc. Hale Kewalo Rental Housing Development: Draft Environmental Assessment. August 1992.

Wilson Okamoto & Associates, Inc. Hale Kewalo Rental Housing Development: Environmental Impact Statement Preparation Notice. January 1993.

Wilson Okamoto & Associates, Inc. Social Impact Assessment: Hale Kewalo Rental Housing Development. Prepared by Earthplan. March 1993.

APPENDICES

A.....FLOOD STUDY

B.....ARCHAEOLOGY STUDY

C.....TRAFFIC STUDY

D.....ACOUSTIC/VIBRATION STUDY

E.....SOCIAL IMPACT STUDY

APPENDIX A
FLOOD STUDY



Edward K. Noda
and
Associates, Inc.

Engineers
and
Environmental
Consultants

Engineering
Planning
Surveys
Computer
Modeling

615 Piikoi Street
Suite 1000
Honolulu, Hawaii
96814

Telephone
(808) 533-0553
Facsimile
(808) 524-1126

ESTIMATE OF COASTAL FLOOD ELEVATION
U.H. - KAKAAKO PROJECT
(Former site of Kapiolani Community College)
TMK:2-3-09:1 (PORTION)

Prepared by:

Edward K. Noda and Associates, Inc.

April 8, 1992

References:

1. Flood Insurance Rate Map (FIRM), City & County of Honolulu, Hawaii, Panel #150001 0120C, revised September 4, 1987, Federal Emergency Management Agency.
2. "Hurricane Vulnerability Study for Honolulu, Hawaii, and Vicinity, Volume 2, Determination of Coastal Inundation Limits for Southern Oahu from Barbers Point to Koko Head", prepared for the U.S. Army Engineer Division, Pacific Ocean, prepared by Charles L. Bretschneider and Edward K. Noda and Associates, Final Report dated May 1985.



BACKGROUND:

A new development is proposed on the former site of Kapiolani Community College located at the corner of Pensacola Street and Kapiolani Boulevard. The parcel, TMK:2-3-09:1 (portion), is situated on the Makai-Diamond Head corner of the McKinley High School site. Inclosure 1 shows the location of the parcel. The majority of the parcel is located within the coastal flood hazard area defined as Zone A (no base flood elevations determined) by the Federal Emergency Management Agency (FEMA). Inclosure 2 shows the project site on the Reference 1 FIRM.

ESTIMATE OF FLOOD ELEVATION:

Reference 2 provides estimates for the landward limits of flooding along the south shore of Oahu for several "scenario" hurricane events. (This referenced study formed part of the basis for the latest revisions to the FEMA Flood Insurance Rate Maps.) A one-dimensional surge model was used to estimate the overland flow characteristics due to hurricane induced wave and storm surge effects. The surge model was applied at representative land profile locations along the coast. The land profile locations closest to the project site, Profiles 47 and 48, are shown on Inclosure 1.

The flood elevations for Profiles 47 and 48 from the Reference 2 study are as follow:

<u>Profile</u>	<u>SE Model Scenario</u>		<u>SW Model Scenario</u>	
	<u>MLLW Elev.</u>	<u>MSL Elev.</u>	<u>MLLW Elev.</u>	<u>MSL Elev.</u>
47	6.6'	5.8'	7.5'	6.7'
48	5.0'	4.2'	5.3'	4.5'



The project site is situated closest to Profile 47. In most cases, if a site is situated between two profile locations, a representative estimate of the area-wide flooding would be the average flood elevation for both profiles. This approach is appropriate because the one-dimensional surge model does not take into account the side effects or lateral spreading of the flood flows. However, this particular project site is located almost directly on the Profile 47 alignment. Therefore, the flood elevations from the Reference 2 study for Profile 47 is the most representative estimate for the project site.

It should be noted that the Reference 2 study was prepared for State Civil Defense planning purposes, and not for the purpose of establishing 100-year coastal flood elevations. In particular, no frequency of occurrence statistics were developed for the hypothetical "scenario" hurricane events. Furthermore, the application of these hurricane parameters to the analysis of coastal inundation assumed a worst case condition at each land profile location, rather than a synoptic representation of a single hurricane event. Since the probability of a major hurricane passing over Oahu is very slight (this has not happened during the entire period of record), the theoretical 100-year coastal flood potential is probably much less than indicated by the Reference 2 study results.

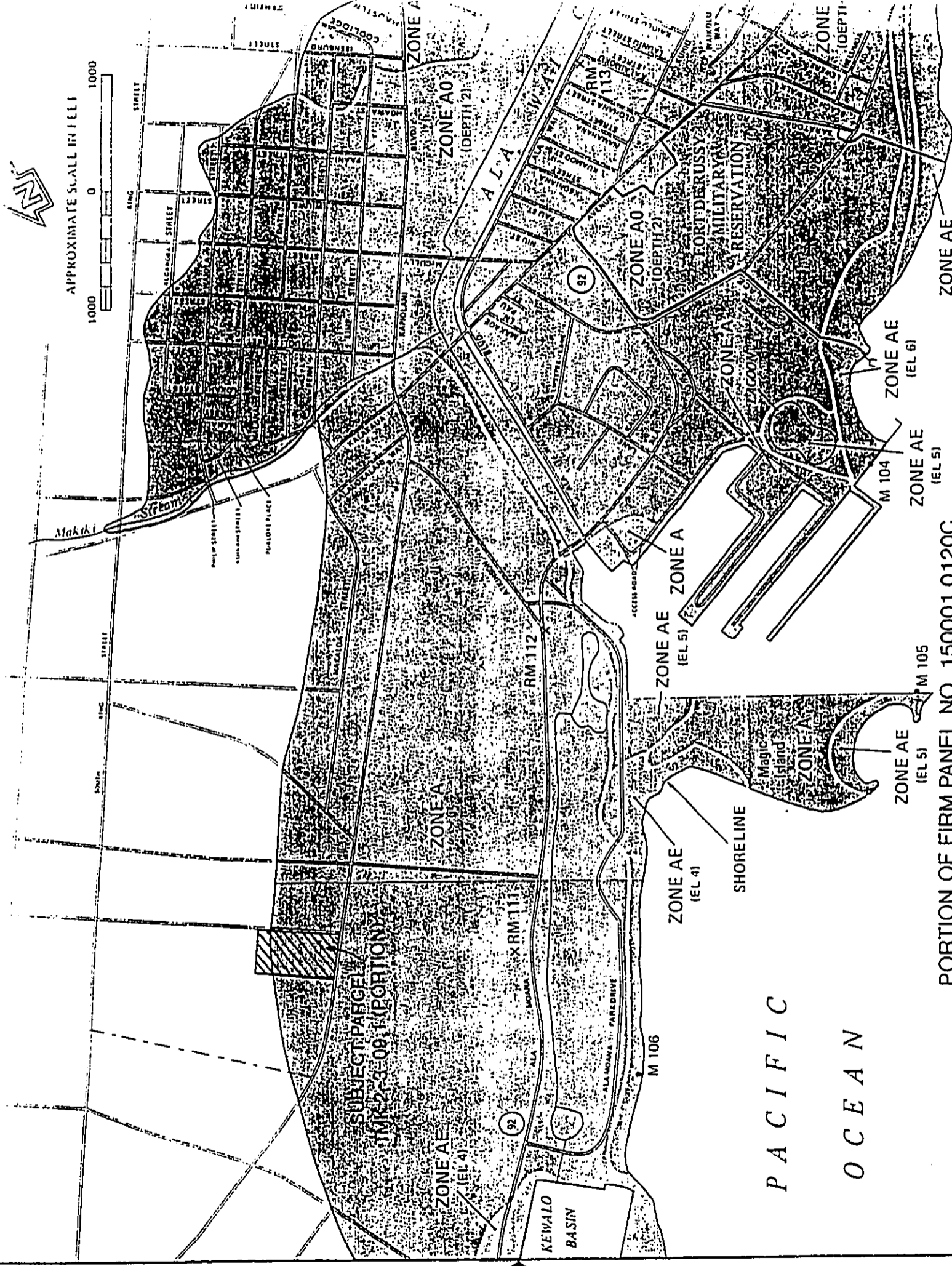
The FIRM base flood elevation in the Zone AE at the seaward portion of the shoreline fronting the project site is 4 feet above MSL, as shown on Inclosure 2. The SE Model Scenario hurricane flood elevation from Reference 2 for Profile 47 provides the most consistent correlation with the FIRM base flood elevation. Thus, the most appropriate estimate for the base flood elevation for the Zone A in the vicinity of the project site is the SE Model Scenario flood elevation of 5.8 feet above MSL for Profile 47.



SUMMARY:

1. The subject parcel is located almost entirely within Zone A (base flood elevation undetermined by FEMA).
2. Based on the Reference 2 study results, the most representative base flood elevation for the Zone A area in the vicinity of the project site is +5.8' MSL.

Attachments (2)



PORTION OF FIRM PANEL NO. 150001 0120C,
 REVISED SEPTEMBER 4, 1987.

ENCLOSURE 2

APPENDIX B

ARCHAEOLOGICAL STUDY

**AN ARCHAEOLOGICAL ASSESSMENT
OF A 5.33 ACRE PARCEL
IN THE KAPI'OLANI BUSINESS DISTRICT,
HONOLULU, ISLAND OF O'AHU
(TMK 2-3-09:portion 01)**

by

Rodney Chiogioji, B.A.
and
Hallett H. Hammatt, Ph.D.

Prepared for

ANBE, ARUGA AND ISHIZU, ARCHITECTS, INC.

CULTURAL SURVEYS HAWAII
April 1992

TABLE OF CONTENTS

LIST OF FIGURES ii

INTRODUCTION 1

CULTURAL HISTORY 4

PREVIOUS ARCHAEOLOGY 27

SUMMARY AND RECOMMENDATIONS 32

REFERENCES CITED 34

LIST OF FIGURES

Figure 1	Portion of USGS 7.5 Minute Series Topographical Map, Honolulu Quadrangle, showing Study Area	2
Figure 2	Tax map showing study area	3
Figure 3	Portion of 1817 map by Otto von Kotzebue with translations (in parentheses) and general location of Kewalo region [from Fitzpatrick 1986]	9
Figure 4	Portion of 1884 map (tracing) by S.E. Bishop	12
Figure 5	Portion of 1897 map by M.D. Monsarrat	17
Figure 6	Photograph of Kewalo - ca. 1890 - view toward Punchbowl (B.P. Bishop Museum Archives)	18
Figure 7	Photograph of Sheridan Street area - ca. early 1900s - view <i>ewa</i> (B.P. Bishop Museum Archives)	19
Figure 8	Portion of 1910 map by Walter E. Wall	20
Figure 9	Portion of 1922 Fire Control Map by U.S. Army Corps of Engineers	22
Figure 10	1931 aerial photograph (Hawaii State Archives)	23
Figure 11	Photograph - ca. 1938 - by Ray Jerome Baker showing Pensacola Street, about one block <i>mauka</i> of Kapiolani Boulevard (Bishop Museum Archives)	24
Figure 12	1952 aerial photograph of Honolulu	26

INTRODUCTION

At the request of Anbe, Aruga and Ishizu Architects, Inc., Cultural Surveys Hawaii has conducted a preliminary archaeological assessment of a 5.33 acre land parcel (TMK 2-3-09:portion 01), situated approximately 760 m. inland of the present shoreline, in the Kapi'olani business district of Honolulu, island of O'ahu. The study area (Figures 1 & 2) is a rectangular parcel measuring approximately 199.1 meters by 106.5 meters at the *'ewa-mauka* corner of the intersection of Pensacola Street and Kapiolani Boulevard.

Currently, the study area is the site of one- and two-story wood and tile buildings which, until 1990, housed the Kapiolani Community College. The Community Colleges Employment Training Office currently occupies some of these buildings.

Research conducted by Cultural Surveys Hawaii focused on the following concerns:

- 1) A summary of traditional Hawaiian and historic land use patterns in the specific environs of the study area. This summary would be based upon a review of early accounts by European visitors and native Hawaiian historians, historic maps, Land Commission Award records, photographs and other pertinent documents.
- 2) An attempt to accurately locate the study area on maps predating the extensive twentieth century modifications to the Honolulu area.
- 3) A review of previous archaeological research conducted in the vicinity of the study area.
- 4) An assessment of possible archaeologically significant sub-surface deposits which this preliminary research suggests may be present in the study area and which may be impacted by future construction.
- 5) Recommendations for mitigation of potential impact from future construction.

Research procedures undertaken included studies of documents at the Hawaii State Archives, the Mission Houses Museum Library, the Hawaii Public Library, and the Archives of the Bishop Museum; study of maps at the Survey Office of the Department of Land and Natural Resources; and inspection of the study area by the staff of Cultural Surveys Hawaii. The results of this research are the subject of this report.

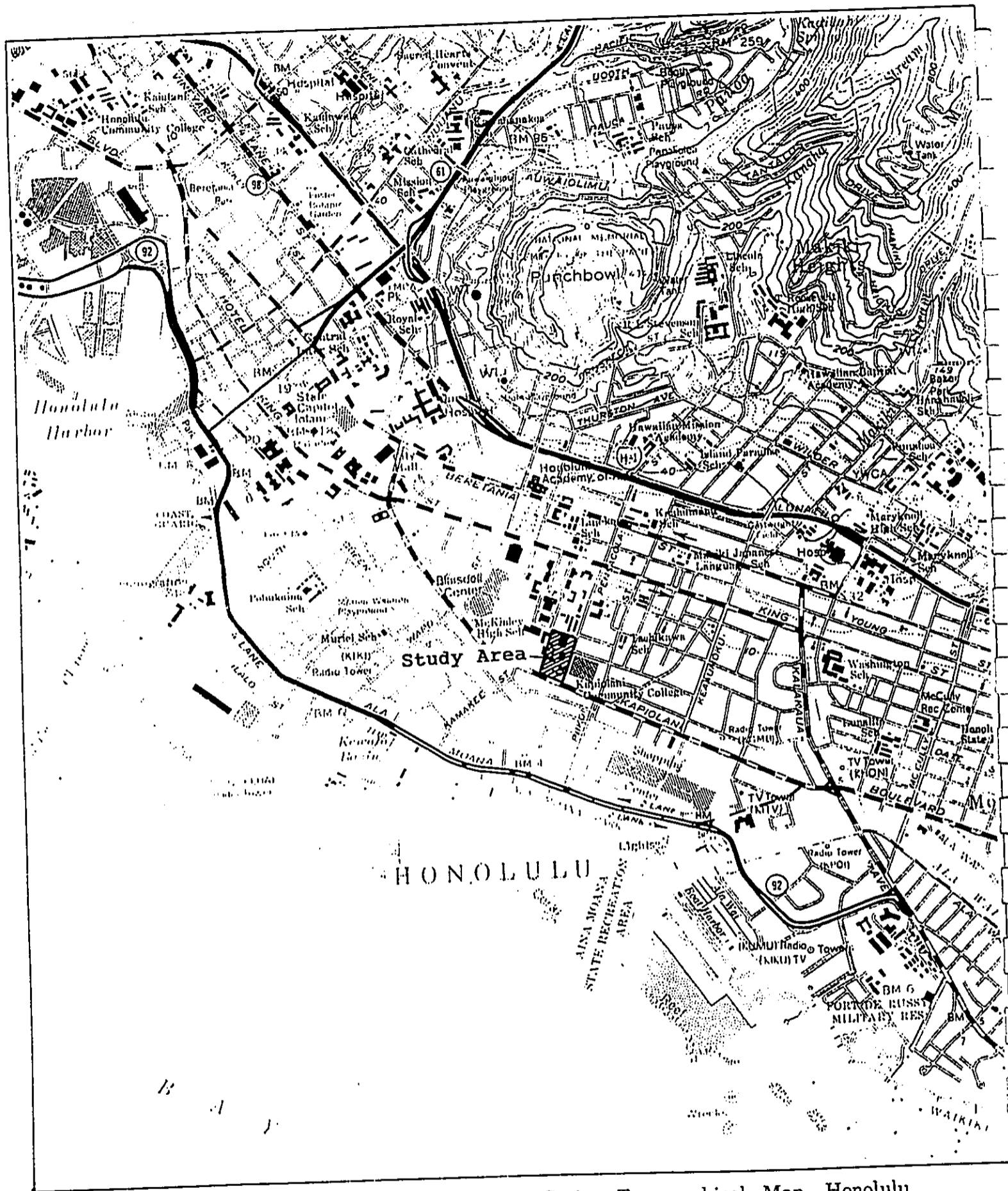


Figure 1 Portion of USGS 7.5 Minute Series Topographical Map, Honolulu Quadrangle, showing Study Area

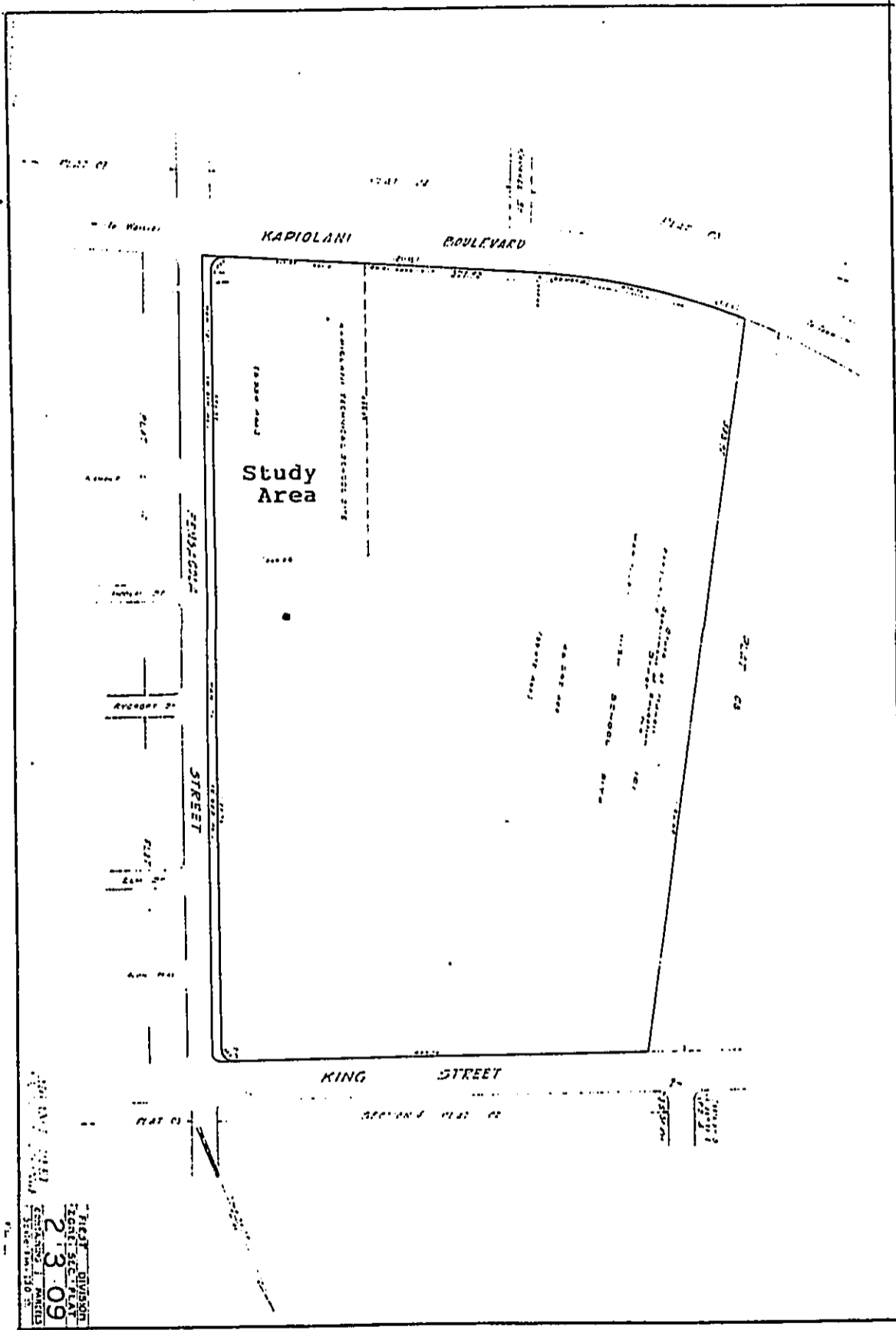


Figure 2 Tax map showing study area

CULTURAL HISTORY

The present study area is located in an region identified as Kewalo on early historic maps. Kewalo is situated between two centers of population and activity on the southern shore of pre-contact O'ahu: Kou and Waikiki. In Waikiki, a system of irrigated taro *lo'i* fed by streams descending from Makiki, Manoa, and Palolo valleys blanketed the plain, and networks of fish ponds dotted the shoreline. Similarly, Kou - the area of downtown Honolulu surrounding the harbor - possessed shoreward fish ponds and irrigated fields watered by ample streams descending from Nu'uuanu and Pauoa valleys. Kewalo's "identity" - its pre-contact population and usage patterns - may have derived from its relationship to these two densely populated areas: it may have participated in some of the activities associated with them. Thus, the attempt to recover the Kewalo region (and the present study area) as it existed for the Hawaiians during the centuries before western contact and the modern urbanization that has reconfigured the landscape must begin with accounts of Kou and Waikiki.

Waikiki is actually the name of a large *ahupua'a* (traditional land division) encompassing lands stretching from Honolulu to Maunalua Bay. Within that *ahupua'a*, by the time of the arrival of Europeans during the late eighteenth century, the area today known as Waikiki had long been a center of population and political power on O'ahu. According to Martha Beckwith (1940), by the end of the fourteenth century Waikiki had become "the ruling seat of the chiefs of O'ahu." The pre-eminence of Waikiki continued into the eighteenth century and is confirmed by the decision of Kamehameha, in the midst of unifying control of the islands, to reside there after wresting control of O'ahu by defeating the island's chief, Kalanikupule. The nineteenth century Hawaiian historian John Papa I'i, himself a member of the *ali'i*, described the king's Waikiki residence:

Kamehameha's houses were at Puaaliilii, makai of the old road, and

extended as far as the west side of the sands of Apuakehau. Within it was Helumoa where Kaahumanu *ma* went to while away the time. The king built a stone house there, enclosed by a fence... (I'i 1959: 17)

I'i further noted that the "place had long been a residence of chiefs. It is said that it had been Kekuapoi's home, through her husband Kahahana, since the time of Kahekili" (*Ibid*).

Chiefly residences, however, were only one element of a complex of features - sustaining a large population - that characterized Waikiki up to pre-contact times. Beginning in the fifteenth century, a vast system of irrigated taro fields was constructed, extending across the littoral plain from Waikiki to lower Manoa and Palolo valleys. This field system -an impressive feat of engineering the design of which is traditionally attributed to the chief Kalamakua - took advantage of streams descending from Makiki, Manoa and Palolo valleys which also provided ample fresh water for the Hawaiians living in the *ahupua'a*. Water was also available from springs in nearby Mo'ili'ili and Punahou. Closer to the Waikiki shoreline, coconut groves and fishponds dotted the landscape. A sizeable population developed amidst this Hawaiian-engineered abundance. Captain George Vancouver, arriving at "Whyteete" in 1792, captured something of this profusion in his journals:

On shores, the villages appeared numerous, large, and in good repair; and the surrounding country pleasingly interspersed with deep, though not extensive valleys; which, with the plains near the sea-side, presented a high degree of cultivation and fertility.

[Our] guides led us to the northward through the village, to an exceedingly well-made causeway, about twelve feet broad, with a ditch on each side.

This opened our view to a spacious plain, which, in the immediate vicinity of the village, had the appearance of the open common fields in England; but, on advancing, the major part appeared to be divided into fields of irregular shape and figure, which were separated from each other by low stone walls, and were in a very high state of cultivation. These several portions of land were planted with the eddo or *taro* root, in different stages of inundation; none being perfectly dry, and some from three to six or seven inches under water. The causeway led us near a mile from the beach, at the end of which was the water we were in quest of. It was a rivulet five or six feet wide, and about two or three feet deep, well banked up, and nearly

motionless; some small rills only, finding a passage through the dams that checked the sluggish stream, by which a constant supply was afforded to the taro plantations.

[We] found the plain in a high state of cultivation, mostly under immediate crops of taro; and abounding with a variety of wild fowl, chiefly of the duck kind...The sides of the hills, which were at some distance, seemed rocky and barren; the intermediate vallies, which were all inhabited, produced some large trees, and made a pleasing appearance. The plains, however, if we may judge from the labour bestowed on their cultivation, seemed to afford the principal proportion of the different vegetable productions on which the inhabitants depend for their subsistence. (Vancouver 1798: I, 461-464)

Further details of the exuberant life that must have characterized the Hawaiians use of the lands that included the *ahupua'a* of Waikiki are given by Archibald Menzies, a naturalist accompanying Vancouver's expedition:

The verge of the shore was planted with a large grove of cocconut palms, affording a delightful shade to the scattered habitations of the natives. Some of those near the beach were raised a few feet from the ground upon a kind of stage, so as to admit the surf to wash underneath them. We pursued a pleasing path back into the plantation, which was nearly level and very extensive, and laid out with great neatness into little fields planted with taro, yams, sweet potatoes, and the cloth plant. These, in many cases, were divided by little banks on which grew the sugar cane and a species of *Dracaena* without the aid of much cultivation, and the whole was watered in a most ingenious manner by dividing the general stream into little aqueducts leading in various directions so as to be able to supply the most distant fields at pleasure, and the soil seems to repay the labour and industry of these people by the luxuriancy of its productions. Here and there we met with ponds of considerable size, and besides being well stocked with fish, they swarmed with water fowl of various kinds such as ducks, coots, water hens, bitterns, plovers and curlews. (Menzies 1920: 23-24)

These and other early written accounts clearly depict a continuous zone of population and cultivation from the shoreline of present day Waikiki Beach extending north well into Manoa Valley. These accounts, however, are less clear on the western and eastern bounds of this zone, and there are no specific references to Waikiki's abundance reaching into the Kewalo region.

A basic description of Honolulu and Kou up to western contact is given by E.S.

Craighill and Elizabeth Handy:

What is now Honolulu was originally that flatland area between the lower ends of Nu'uaniu and Pauoa Valleys and the harbor. [W.D.] Westervelt...wrote that "Honolulu" was probably a name given to a very rich district of farm land near what is now ...the junction of Liliha and School Streets, because its chief was Honolulu, one of the high chiefs of the time of Kakuhihewa...' It is probable that the chief referred to by Westervelt took his name from the harbor and adjoining land. The original name of the land where the town grew when the harbor became a haven for foreign ships was Kou...The number of *heiau* in this area indicates that it was a place of first importance before the era of foreign contact. (Handy and Handy 1972: 479)

Rev. Hiram Bingham, arriving in Honolulu in 1820, described a still predominantly native Hawaiian environment - still a "village" - on the brink of western-induced transformations:

We can anchor in the roadstead abreast of Honolulu village, on the south side of the island, about 17 miles from the eastern extremity...Passing through the irregular village of some thousands of inhabitants, whose grass thatched habitations were mostly small and mean, while some were more spacious, we walked about a mile northwardly to the opening of the valley of Pauoa, then turning southeasterly, ascending to the top of Punchbowl Hill, an extinguished crater, whose base bounds the northeast part of the village or town...Below us, on the south and west, spread the plain of Honolulu, having its fishponds and salt making pools along the seashore, the village and fort between us and the harbor, and the valley stretching a few miles north into the interior, which presented its scattered habitations and numerous beds of *kalo* (*arum esculentum*) in its various stages of growth, with its large green leaves, beautifully embossed on the silvery water, in which it flourishes. (Bingham 1981: 92-93)

The Kewalo region would have been in Bingham's view as he stood at "Punchbowl Hill" looking toward Waikiki to the south: it would have comprised part of the area he describes as the "plain of Honolulu" with its "fishponds and salt making pools along the seashore."

Another visitor to Honolulu in the 1820s, Jacobus Boelen, hints at the possible pre-contact character of Honolulu and its environs, including the Kewalo area:

It would be difficult to say much about Honoruru. On its southern side is the harbor or the basin of that name (which as a result of variations in pronunciation [*sic*] is also written as Honolulu, and on some maps,

Honoonono). The landlocked side in the northwest consists mostly of *tarro* fields. More to the north there are some sugar plantations and a sugar mill, worked by a team of mules. From the north toward the east, where the beach forms the bight of Whytete, the soil around the village is less fertile, or at least not greatly cultivated. (Boelen 1988: 62)

Boelen's description suggests preliminarily that the Kewalo region and the present study area are within a "not greatly cultivated" region of Honolulu perhaps extending from Puowaina (Punchbowl crater) at the north through Kaka'ako to the Kalia portion of Waikiki in the east.

Kewalo is named in John Papa Ii's account of the death in 1810 of Isaac Davis, an American sailor who had settled in the Hawaiian islands, becoming a confidant of Kamehameha:

Many chiefs and notables mourned Davis, including Kamehameha and the company of warriors who watched over him. The funeral procession went from Davis' dwelling at Aienui to Kewalo, where his body was deposited on the land of Alexander, a haole who had died earlier. At the time of his death, Davis was an old man with white hair and other signs of age. (Ii 1959:85)

An article about Davis in *The Friend* of February 1862 mentions only that his grave was "in the burying place of the Europeans, near Hana-rura," suggesting that the Kewalo region and the "burying place" were outside the limits of Honolulu both at the time of Davis's death and 42 years later when the article was written.

An early, somewhat generalized depiction of the pre-contact native Hawaiian shaping of Waikiki, Honolulu and the Kewalo region - along with a possible location of the "burying place of the Europeans" within Kewalo - is given on an 1817 map (Figure 3) by Otto von Kotzebue, commander of the Russian ship *Rurick*, who had visited O'ahu the previous year. The map shows taro *lo'i* (the rectangles) massed around the streams descending from Nu'uuanu and Manoa valleys. The depicted areas of population and habitation concentration (indicated by the trapezoids), however, probably reflect distortions caused by the post-contact shift of Hawaiians to the area around Honolulu

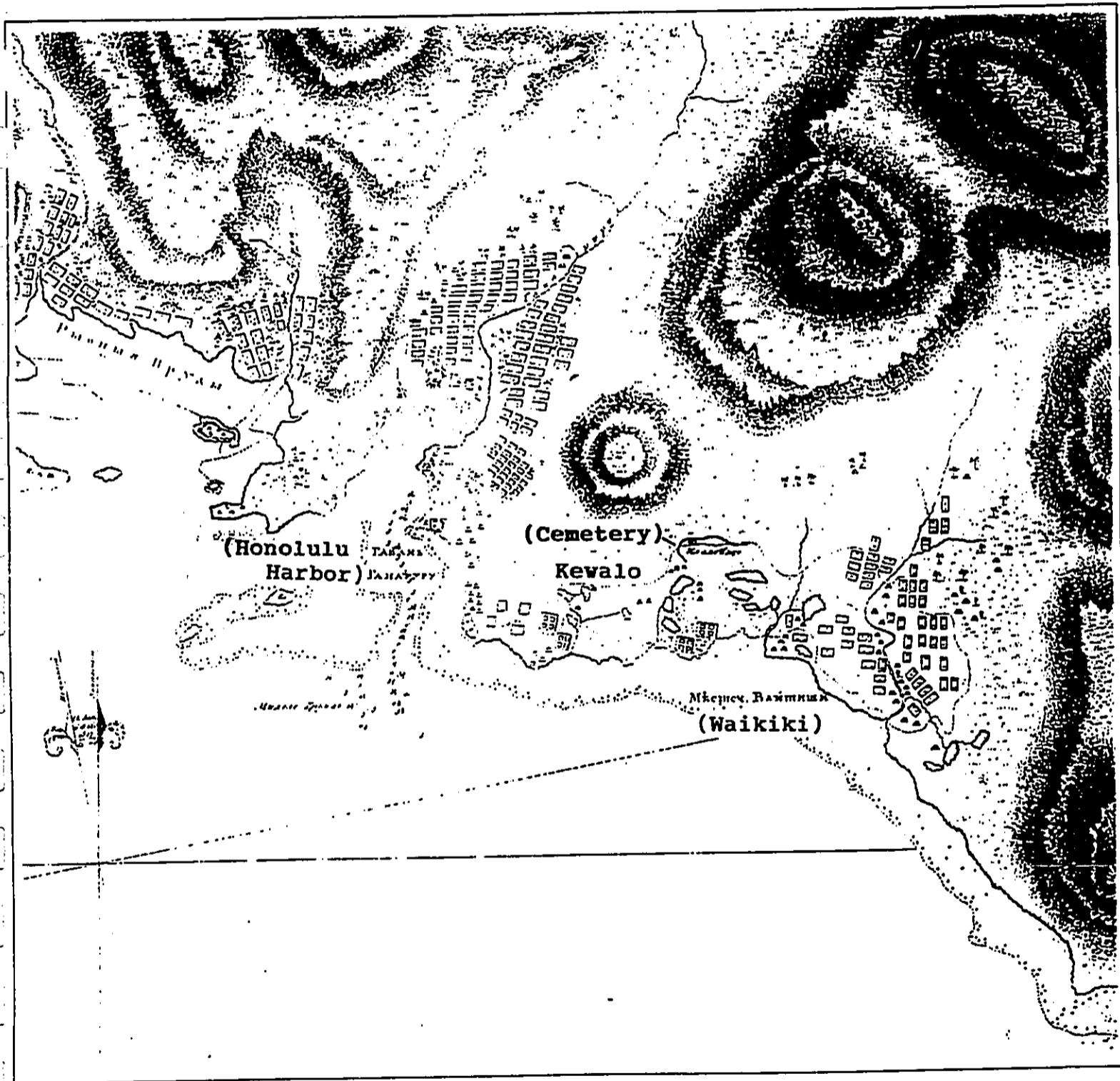


Figure 3 Portion of 1817 map by Otto von Kotzebue with translations (in parentheses) and general location of Kewalo region [from Fitzpatrick 1986]

harbor - the only sheltered landing on O'ahu and the center of increasing trade with visiting foreign vessels. (Kamehameha himself had moved from Waikiki to Honolulu in 1809.)

Kotzebue's map suggests that the land between Puowaina (Punchbowl crater) and the shoreline - which would include the Kewalo area - formed a "break" between the heavily populated and cultivated centers of Honolulu and Waikiki: the area is only characterized by fishponds, trails connecting Honolulu and Waikiki, and occasional taro *lo'i* and habitation sites.

Interestingly, the only specifically identified feature in the entire area is Кладбище - or cemetery - and this may be the approximate location of Davis' and other foreigners' burials in Kewalo.

A clearer picture of Kewalo and the present study area develops with accounts of other visitors to and settlers of Honolulu during the first half of the nineteenth century. Gorman D. Gilman, who arrived in Honolulu in 1841, recalled in a memoir the limits of Honolulu during the early 1840s:

The boundaries of the old town may be said to have been, on the makai side, the waters of the harbor; on the mauka side, Beretania street; on the Waikiki side [i.e., the area just beyond Punchbowl Street], the barren and dusty plain, and on the Ewa side, the Nuuanu Stream. (Gilman 1903: 97)

Gilman further describes the "barren and dusty plain" beyond (east of) Punchbowl Street:

The next and last street running parallel [he had been describing the streets running *mauka-makai*] was that known as Punchbowl Street. There was on the entire length of this street, from the makai side to the slopes of Punchbowl, but one residence, the two-story house of Mr. Henry Dimond, mauka of King Street. Beyond the street was the old Kawaiahao church and burying ground. A more forsaken, desolate-looking place than the latter can scarcely be imagined. One to see it in its present attractiveness of fences, trees and shrubbery, can hardly believe its former desolation, when without enclosure, horses and cattle had free access to the whole place. (*Ibid*: 89)

That the Kaka'ako environs of the missionary enclave and Kawaiaha'o Church were indeed "forsaken" and "desolate-looking" in the 1820s when the missionaries were first

settled there is confirmed in the memoirs of the American missionary C.S. Stewart who, arriving on Maui after living at Kaka'ako, declared Lahaina to be "like the delights of an Eden" after "four weeks' residence on the dreary plain of Honoruru" (Stewart 1970: 177). It is likely that these descriptions of the Honolulu plain also comprehend - at least for western sensibilities - the Kewalo region beyond Kaka'ako.

Among the first descriptions of Kaka'ako and Kewalo by the Hawaiians themselves are the testimonies recorded during the 1840s in documents associated with land awards and awardees of the Great Mahele. These records bring the present study area into clearer focus. A portion of a modern tracing of an 1884 map by S.E. Bishop (Figure 4) shows the disposition of Land Commission Awards (LCAs) granted in the environs of the study area. (The tracing includes some modern streets not present in 1884. These additions, however, permit an accurate positioning of the study area on the 1884 map.)

The study area itself is located within the portion of LCA 10605, awarded to Kamake'e Pi'ikoi, a member of the *ali'i*, which comprised the entire *'ili 'aina* of Kewalo (270.84 acres).

Documents related to this large award - LCA 10605 - reveal little of the actual character of the land. However, records for other awards - including testimonies entered for small *kuleana* awards to individual tenants in the area - make the history and spirit of Kewalo come alive.

The land immediately *makai* of Kewalo was included in LCA 387 to the American Board of Commissioners for Foreign Missions (ABCFM). Testimonies describe the land - identified as "Punahou" - and the background of the ABCFM's claim to it:

The boundaries of that part which lies on the sea shore we cannot define so definitely, but presume there will be no difficulty in determining them, as it is commonly known as pertaining to Punahou. This part embraces fishing grounds, coral flats & salt beds.

The above land was given by Boki to Mr. Bingham, then a member of

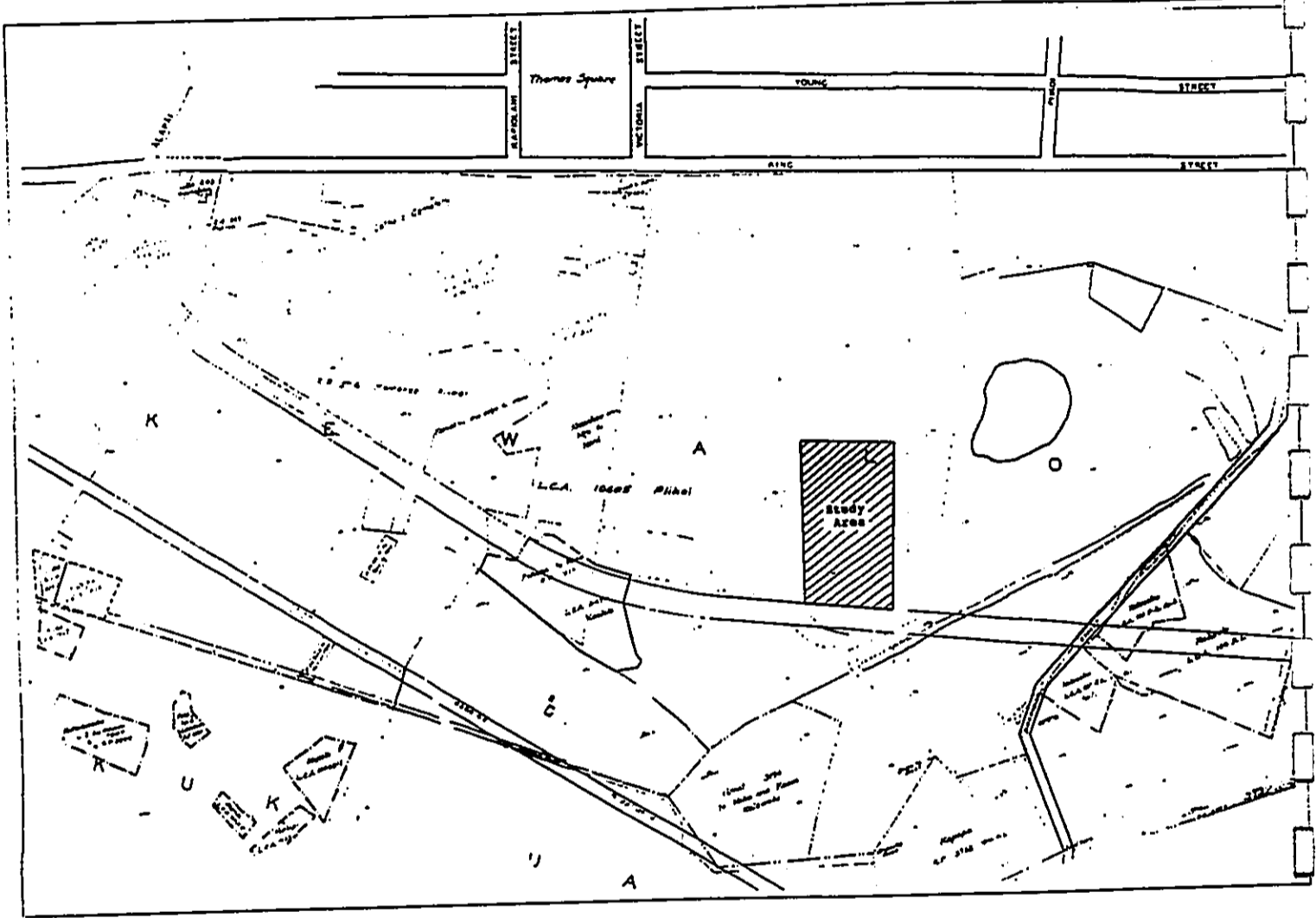


Figure 4 Portion of 1884 map (tracing) by S.E. Bishop

the above named Mission & the grant was afterwards confirmed by Kaahumanu. (*Foreign Register*, Vol.2: 33)

The Makai part of Punahou is bounded Mauka by "Kewalo" and "Koula", Waititi side by "Kalia", seaward it extends out to where the surf breaks. Honolulu side by "Honolulu."

This land was given to Mr. Bingham for the Sandwich Island Mission by Gov. Boki in 1829...From that time to these the S.I. Mission have been the only Possessors and Konohikis of the Land...

The name of the Makai part is Kukuluaeo. There are several tenants on the land of Punahou whose rights should be respected. (*Foreign Testimony*, Vol.3: 115)

That the land just *makai* of the present study area was indeed exposed coral flats dotted with salt pans and fish ponds up to the nineteenth century is corroborated in the testimonies recorded for individual *kuleana* awards to some of those tenants on that land "whose rights should be respected."

LCA 1503 to Puaa is recorded as consisting of three fish ponds and a houselot.

LCA 1604 to Pahiha (Pahika on the 1884 map) comprised a houselot, pond and salt bed.

Testimony for LCA 1903 to Lolohi (Lolopi on the 1884 map) explicitly defines the general area:

Peka W.[*wahine*] sw. I know this place. It is on the salt plains of Honolulu, used for making salt.

Mauka is a stream of salt water. Waititi is several salt ponds - Napela, Kunia and others own them. Makai - Gov't road. Honolulu - Peka Kaula, Lilea, Bolabola, Poe.

Claimant rec^d this land from his father who died last year and held it a long time back in Kinau's time. (*Foreign Testimony*, Vol.3: 220)

LCA 9549 to Kaholomoku comprised "three ponds, a salt *mo'o*" (*Native Register*, Vol.4: 477).

LCA 10463 to Napela is recorded as consisting of "2 ponds, a ditch, 2 deposits, a house site and a salt land section in two pieces" (*Native Testimony*, Vol.10: 445).

Within Kewalo itself is LCA 3169 to Koalele:

Mahoe, sworn, says he knows the land of Claimant in 'Kewalo'.

It consists of some kalo patches mauka and some Lokos makai.

The kalo patches are bounded mauka by Kealoha; bound Waikiki side by Kuaipaka's, makai by the konohiki. Ewa side by J. Booth.

The fish ponds are bounded mauka by the konohiki. Waikiki and makai side, the same. Honolulu side by J. Booth.

Clt received his land from Kapihi in the life time of Kinau and he has held the same without dispute till the present time. (*Foreign Testimony*, Vol.3: 507)

The *mauka* portion of Koalele's claim which includes the taro patches is not shown on the 1884 map; it is likely somewhere immediately *mauka* of King Street. The *makai* portion - the "Lokos" or fish ponds - is shown located just west of the present study area.

Other Land Commission Awards in the vicinity of the study area are shown just Waikiki of the present Sheridan Street. LCA 100 F.L. to Kekaula is recorded as consisting of "2 ponds, 5 fish ponds, 1 patch, house site and a pasture in one section of land" (*Native Testimony*, Vol.10: 304). LCA 101 F.L. to Kaluaoku included "two ponds and three small kiopua ponds for young fish and one lo'i" (*Native Register*, Vol.3: 764).

The LCA records thus help clarify both the pre-contact and mid-nineteenth century pictures of the study area. They suggest that the traditional Hawaiian usage of the Kewalo region and its environs may have been confined to salt making and farming of fishponds, with minimal wetland agriculture in those areas *mauka* or toward Waikiki at the very limits of the field system descending from Makiki and Manoa. The characterization by a native Hawaiian of the expanse just *makai* of the present study area as the "salt plains of Honolulu" itself suggests the environmental limitations that would have made the general region less desirable for long-term permanent habitation by any sizeable population. However, the testimonies do indicate that the area was lived on and was shaped by Hawaiians before the nineteenth century.

The LCA records also reveal that, midway through the nineteenth century,

taro cultivation and the traditional salt making and fishpond farming activities continued within the environs of the study area. These activities and the land features that supported them would be eliminated during the remainder of the nineteenth century by the urbanization of Honolulu.

The 1884 map shows the nascent traces of the future development in the grid of roads stretching *mauka* of the study area. Other maps, photographs and documents generated from the last decades of the nineteenth century up to the present reveal further characteristics of the original character of the Kewalo lands. They also render the disappearance of that landscape.

Two developments in the Kewalo area - Thomas Square and the "Old Plantation" - during the second half of the nineteenth century are paradigmatic of western-conceived and induced change imposed on the landscape. Thomas Square, named for Admiral Richard Thomas who in July 1843 had restored the Hawaiian flag to Kamehameha III at that site, was designed by Archibald S. Cleghorn in 1875.

Five years earlier, in 1870, Cyrus P. Ward bought the property across King Street from Thomas Square at auction for \$2450 from the estate of the late J. Booth. The property originally consisted of 17 acres with a fishpond but by 1875 Ward's property comprised 30 acres; an article in the *Pacific Commercial Advertiser* (September 4, 1875) reported:

In taking a drive out on the Kulaokahua continuation of King street, attention is attracted to the premises just beyond the Catholic cemetery, the property of Mr. C.P. Ward. The lot consists of some thirty acres, and is thickly planted with algaroba and, in rows, there are some seven thousand thrifty young cocoanut trees...The algarobas will certainly be valuable as firewood, and the cocoanuts alone will in a few years produce a handsome income. The property is well watered by means of pumps driven by windmills, there being an inexhaustible supply of water a few feet below the surface of the plains.

Five years later Ward had built a homestead on the land. He had been dead more than twenty years when the property, by then known as the "Old Plantation" and lived on by his widow Victoria Ward and their children, was described in a 1901 *Paradise of the Pacific* article as

now one vast cocoanut grove, containing upwards of 2,000 trees...It is the largest collection of cocoanut palms in Hawaii and must yield nearly 100,000 nuts a year.

An 1897 map (Figure 5) by M.D. Monsarrat shows Thomas Square and the Old Plantation, and makes evident the urbanization of the landscape of Honolulu that had taken place near the end of the nineteenth century. The map clearly displays the development occurring *mauka* and *'ewa* of the study area, and the "arm" of streets projecting from downtown Honolulu into Kaka'ako and Kewalo. A large portion of Kewalo, however, remains open and the map reveals that the area adjacent to the east of the Old Plantation and *mauka* of the study area has become "Rice Fields". A pond is shown east of the rice fields and the study area. This pond and the surrounding landscape may be the area shown in a photograph of Kewalo taken about 1890 (Figure 6).

A photograph taken during the early 1900s (Figure 7) shows the landscape east of the study area near Sheridan Street. Evident in the foreground are the reeds of the marshes that are also shown on a 1910 map by Walter E. Wall (Figure 8). This map indicates that the marshy landscape pictured in the photograph near Sheridan Street also characterizing the present study area.

Honolulu High School, the first public secondary school in the islands, was established in 1895. The school's name was changed to McKinley High School in 1907 when it moved to Victoria Street across from Thomas Square. During the 1920s the school was moved to its present site fronting South King Street. (The school on Victoria Street later became Linekona School. The school building and grounds are presently the site of

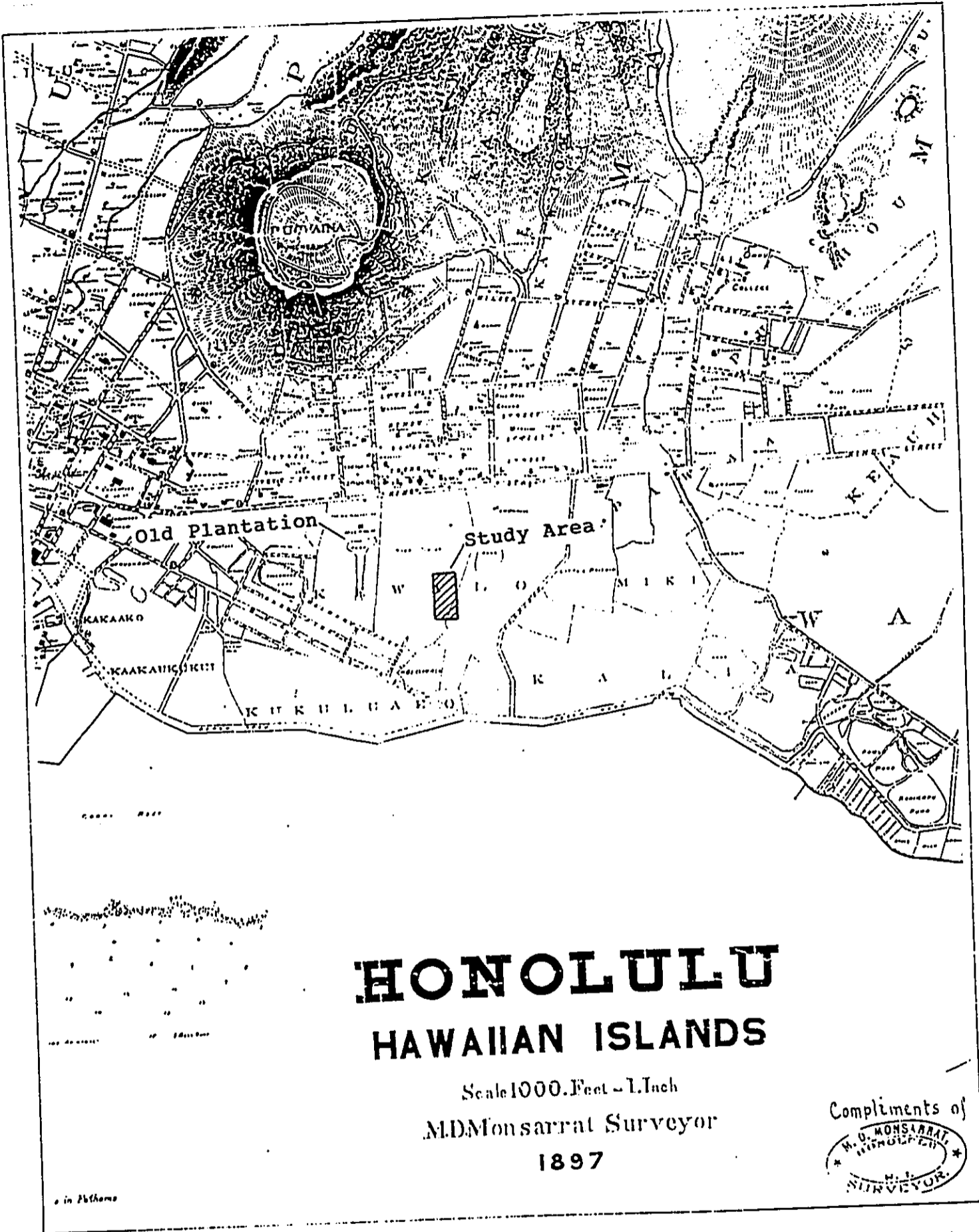


Figure 5 Portion of 1897 map by M.D. Monsarrat



Figure 6 Photograph of Kowalo - ca. 1890 - view toward Punchbowl (B.P. Bishop Museum Archives)



Figure 7 Photograph of Sheridan Street area - *ca.* early 1900s - view *ewa*. (B.P. Bishop Museum Archives)

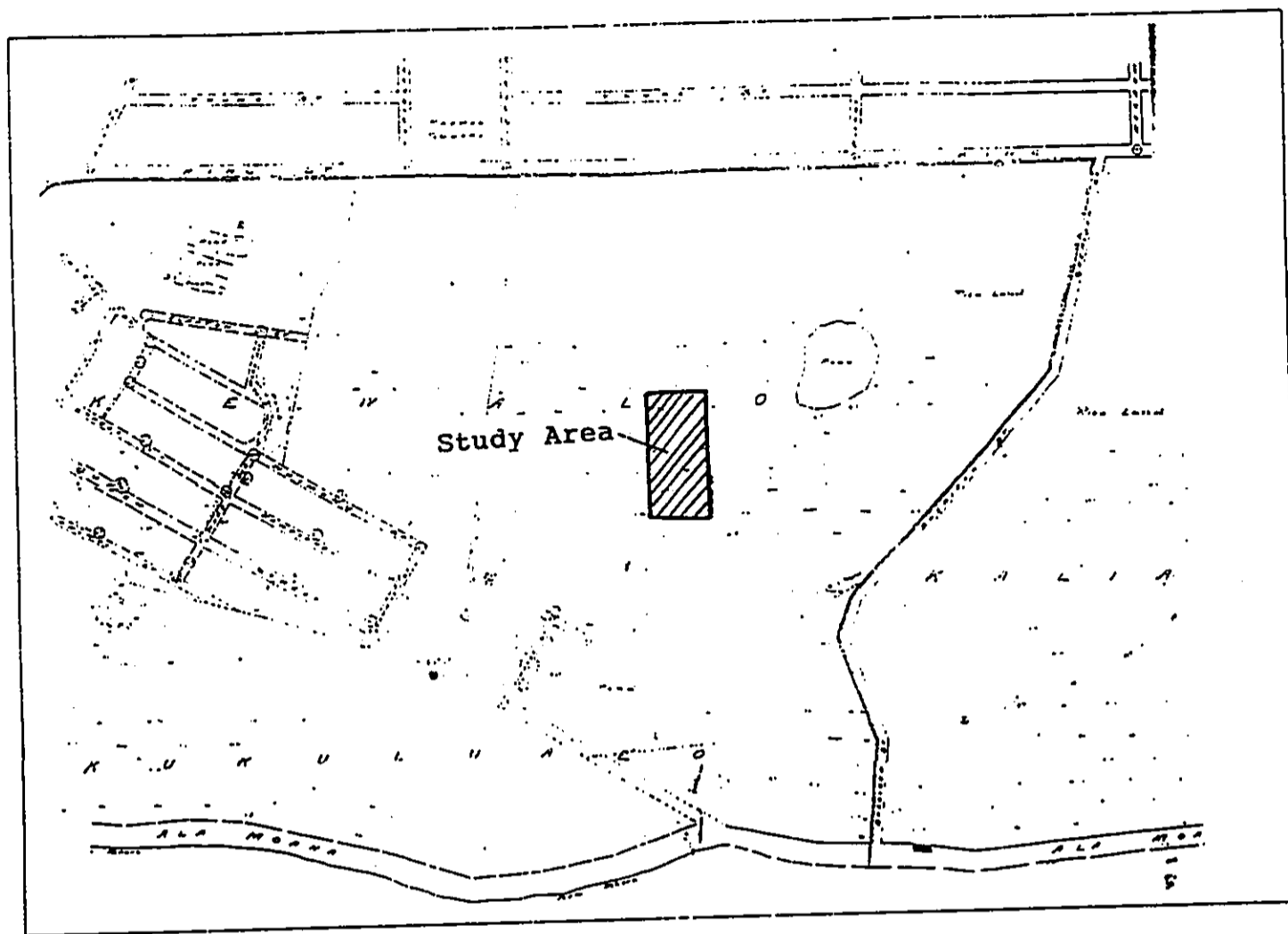


Figure 8 Portion of 1910 map by Walter E. Wall

an education center of the Honolulu Academy of Arts.) A 1922 Fire Control Map (Figure 9) by the U.S. Army Corps of Engineers shows the first buildings of the new McKinley campus and also indicates that the study area is still marsh land. The urbanization of Honolulu proceeds apace, the grids of streets continuing to encroach upon Kewalo. However, the map indicates that into the 1920s large portions of Kewalo - including the study area - were yet to be developed.

Kapiolani Boulevard and Pensacola Street, the two thoroughfares that would define southern and eastern bounds of the study area, were constructed in the 1930s. In 1928 work began on Kapiolani Boulevard, commencing at the intersection of South and King streets. By 1931 the boulevard had reached Sheridan Street. A 1931 aerial photograph (Figure 10) shows the paved *'ewa* end of Kapiolani and the coral-filled road bed marking its route toward Diamond Head. The study area is shown as remaining undeveloped in 1931.

Pensacola Street, named for U.S.S. Pensacola, had been laid out in the nineteenth century but did not extend *makai* past King Street until the late 1930s. A photograph (Figure 11) by Ray Jerome Baker, taken about 1938, shows Pensacola Street about one block *mauka* of Kapiolani Boulevard. The photograph provides a close-up view of the study area along its Pensacola Street boundary. The buildings in the left background are likely housing for McKinley High School janitors.

During the late 1940s the study area became the site of buildings of what would come to be Kapiolani Technical School. According to information provided by Mr. Albert Feirer, former Director of Vocational Education for the Territory of Hawai'i, a school for practical nursing was opened on the site in 1947. Mr. Feirer recalls that the study area was then bare except for two wooden buildings belonging to McKinley High School: a storage building and a agriculture education building. During the following years

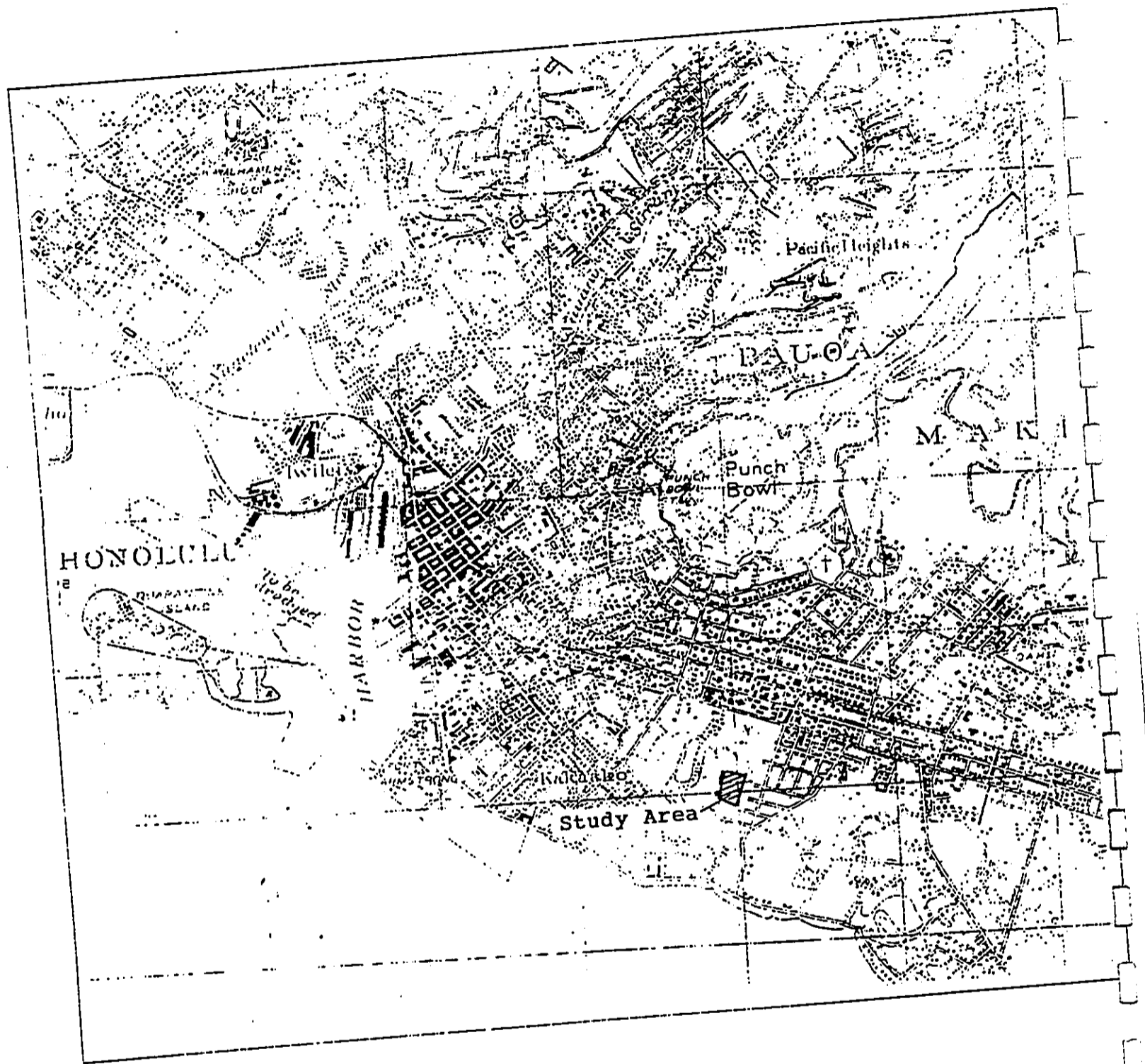


Figure 9 Portion of 1922 Fire Control Map by U.S. Army Corps of Engineers

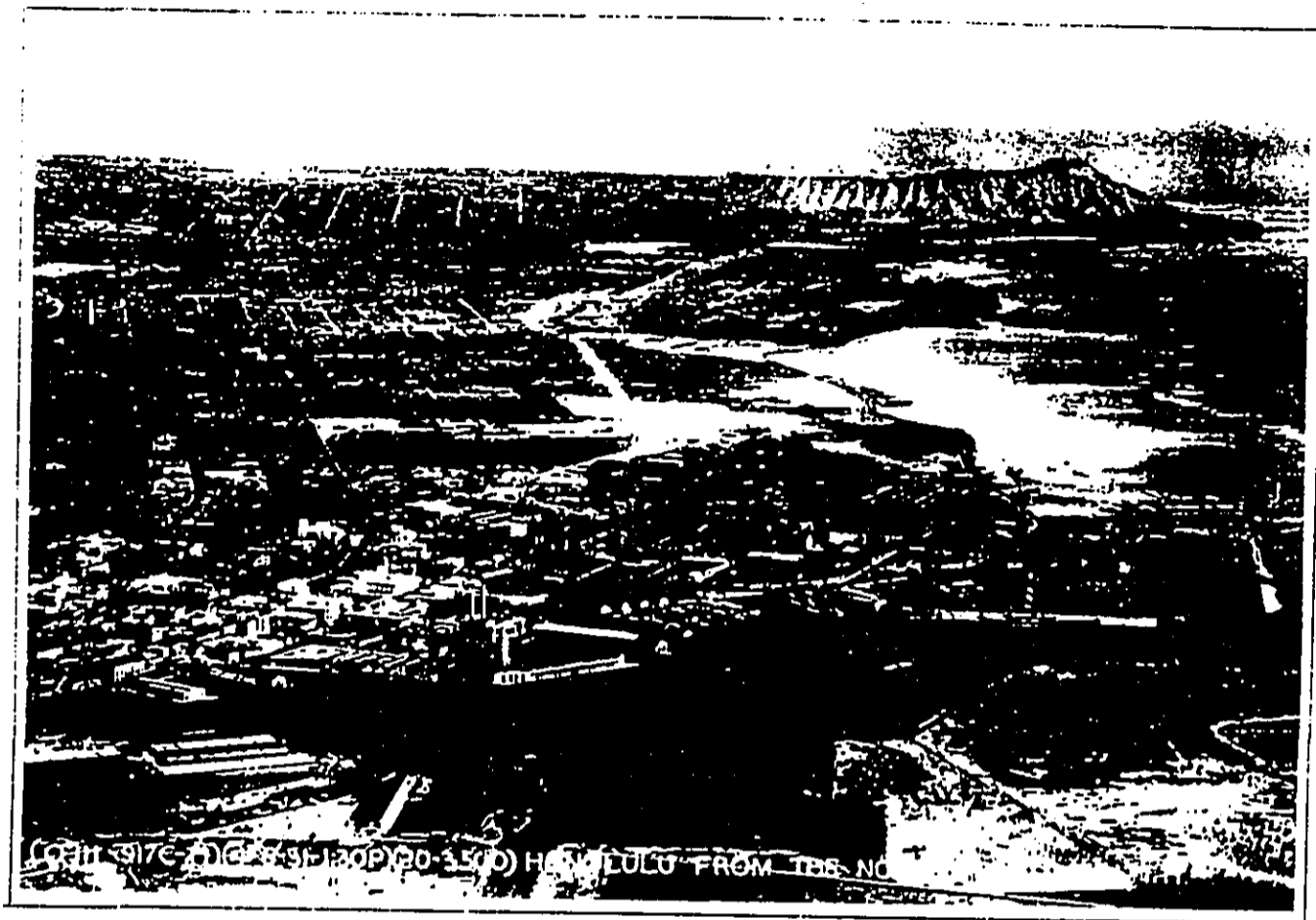


Figure 10 1931 aerial photograph (Hawaii State Archives)

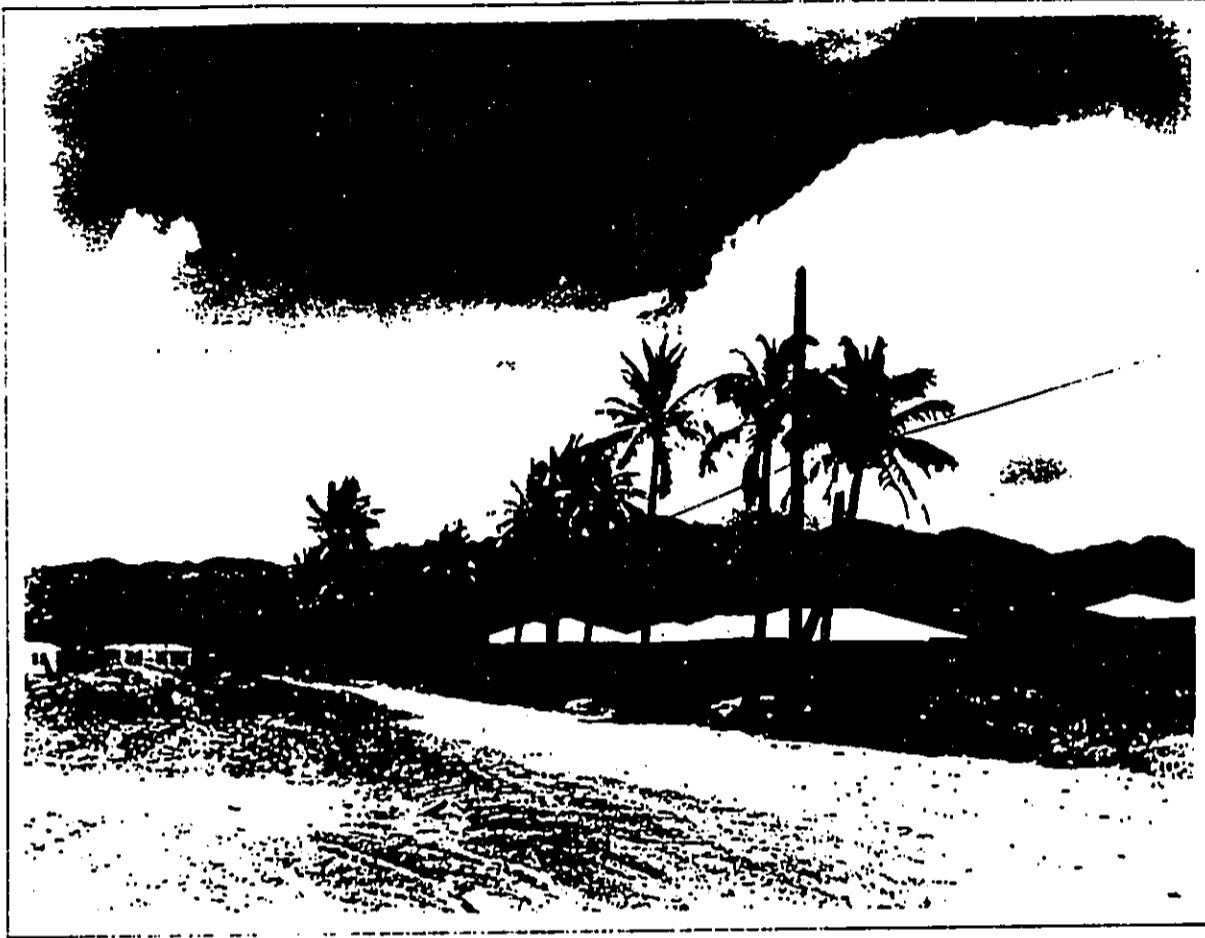


Figure 11 Photograph - *ca.* 1938 - by Ray Jerome Baker showing Pensacola Street, about one block *mauka* of Kapiolani Boulevard (Bishop Museum Archives)

additional buildings were constructed to house schools of business and hotel-restaurant training. The agglomerate of schools was officially named Kapiolani Technical School in 1957.

A 1952 aerial photograph (Fig. 12) shows the technical school buildings lined along Pensacola Street. Mr. Feirer recalled that building construction only involved digging of utility lines and shallow footings and foundations.

In 1965, the technical school became Kapiolani Community College when it was transferred from the Department of Education to the University of Hawaii system. Kapiolani Community College remained on the site until the fall of 1990: during the late 1980s classes had been gradually shifted to a new campus at Diamond Head. The buildings of the former community college today house the Community Colleges Employment Training Office.

In summary, the study area was apparently outside the two most intensely populated and cultivated areas - Waikiki and Honolulu (or Kou) - along this portion of O'ahu's southern shore during pre-contact times. It was, nonetheless, well utilized by the Hawaiians for activities appropriate to the specific environment: salt making and farming of fishponds, along with some wetland agriculture. The study area was also among the last areas of urban Honolulu to be built on and developed.

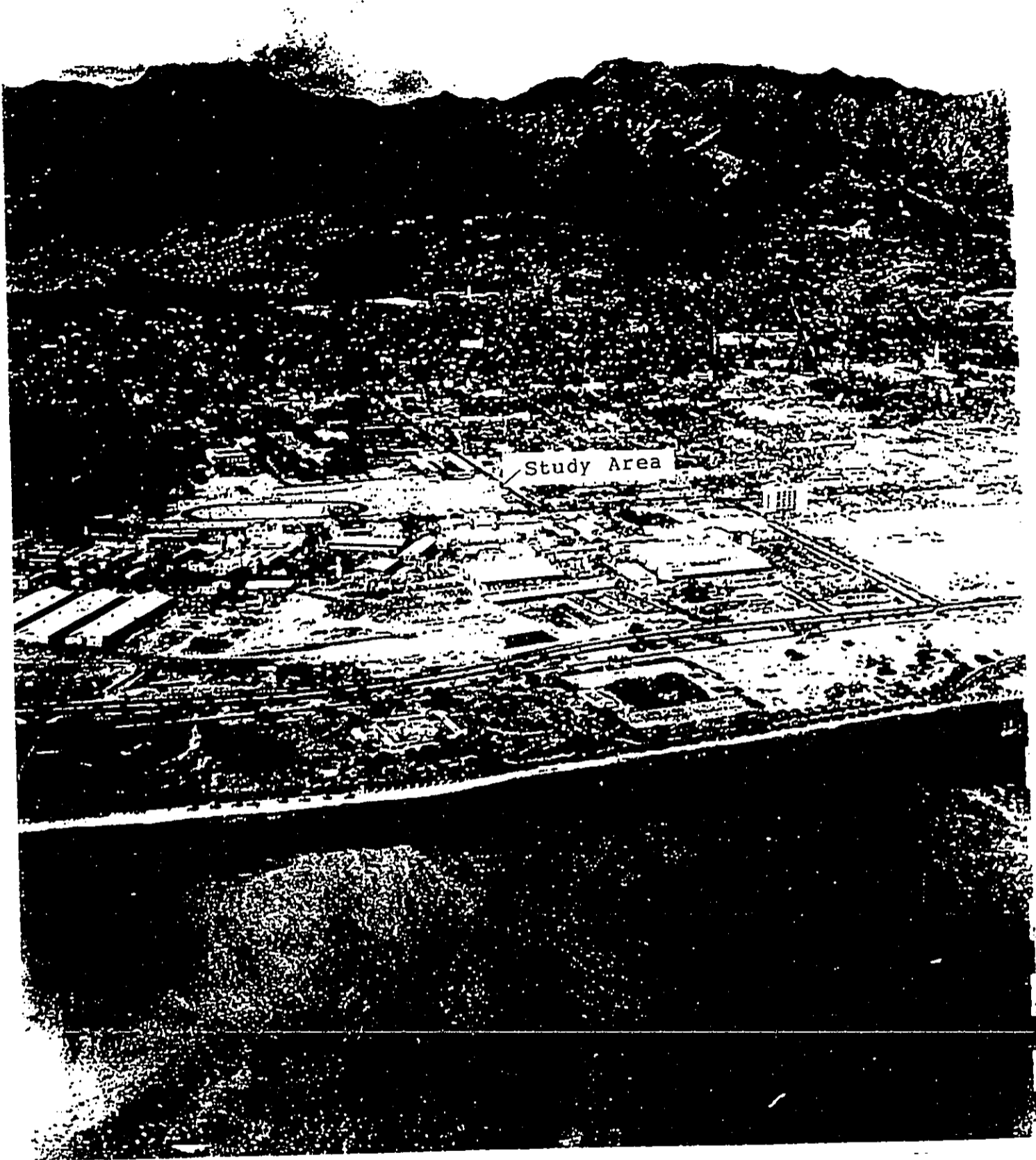


Figure 1. Aerial photograph of the study area.

PREVIOUS ARCHAEOLOGY

No archaeological studies have been conducted within or in close proximity to the present study area. However, studies have been conducted in Kaka'ako to the west and in Waikiki to the east. Work in these areas may give clues to possible archaeological resources within the study area.

The Kaka'ako district of Honolulu became a focus of archaeological work during the 1980s, impelled by the construction of local and federal government buildings and by the state-planned redevelopment of the area.

A 1987 report, *Kaka'ako: Prediction of Sub-surface Archaeological Resources*, detailing archival research and archaeological assessment of the Kaka'ako Community Development District, was prepared by P. Bion Griffin, Dennis Keene, and Joseph Kennedy. The development district comprises the area bounded by Ala Moana Boulevard, and by Punchbowl, King, and Pi'ikoi streets. It thus includes the present study area. The report summarizes the historical import of the area:

Kaka'ako - the Kaka'ako Community Development District - is not the center of life in greater Honolulu that is, or was, either Waikiki or 'downtown' ewa of Punchbowl. It is, however, relatively rich in the remains of nineteenth century Honolulu, of prehistoric Hawaiian life, and of the ethnic influx from the late 1800's until 1940. (Griffin *et al.*: 73)

The report emphasizes one aspect of the area's significance:

Without doubt the single most striking archaeological deposit, and the one to which we assign the highest priority, is the 1853 Honuakaha Cemetery fronted by South Street and bisected by Quinn Lane. More than 1000 human burials are reportedly therein...

Burials will be found throughout Kaka'ako. Some will be in sand remnants, others intruding into the pumice deposited from ancient Punchbowl eruptions. Most will be prehistoric or early historic. We expect that, as in the case of the Ka'akaukui Cemetery, deaths from pre-1853 epidemics resulted in many burials throughout Kaka'ako. The chance of high status (ali'i) burials, from residences in adjacent elite locations, is high. (*Ibid*: 73)

Typical - in its origin (*i.e.*, monitoring of a construction site) and in its findings - of the archaeological work carried out within the Kaka'ako district is the 1987 report, *Archaeological Monitoring of the Makai Parking Garage, Corner of Punchbowl and Halekauwila Streets (TMK 2-1-31: 23)*, by Stephan D. Clark of the Bishop Museum. Archaeological features revealed both prehistoric and historic utilization of the site.

Seven human burials - of which four were "intact burials, with well defined burial pit features, exposed and disturbed by the present construction activities" (Clark 1987: 63) - were unearthed. One of the intact burials was the only confirmed prehistoric feature within the site area.

Osteological analyses of the [four] mostly complete burials... indicates that these individuals were of Hawaiian ancestry... Based on lack of grave goods and on the occurrence of the burial in beach areas, it is fairly safe to assume that these Hawaiians were common people, not of the ali'i class. (*Ibid.*: 114)

Artifacts recovered at the site ranged from basalt tools - including an adze, a hammerstone, and a poi pounder top - and a coral abrader to glass bottles, ceramic fragments, and metal objects. Clark concluded that the "nineteenth century use of the site area included primarily burying of trash and burial of animals" (*Ibid.*: 114).

Prior to the 1980s the majority of information from archaeological research within Waikiki concerned human burials inadvertently excavated during construction activities. In 1901, while digging a sewer line at the James B. Castle property near Diamond Head (in the environs of the present Elks Club), the remains of at least four adult Hawaiians were unearthed along with "a number of conical teeth of whale teeth, a number of round glass beads of large size, and a small sized niho-palaoa, such as was generally appropriated to the use of the chiefs" (Emerson 1902:19).

In the 1920s and 30s the first systematic archaeological survey of O'ahu was

conducted by J.C. McAllister (1930). He recorded four heiau, three of which were located at the mauka reaches of Waikiki ahupua'a in lower Manoa Valley. The fourth heiau - Papaenaena - was located at the foot of Diamond Head crater in the environs of the present Hawaii School for Girls. Papaenaena heiau is traditionally associated with Kamehameha I who was said to have visited the heiau before setting off to battle for Ni'ihau and Kauai in 1804. Five years later, according to John Papa I'i, Kamehameha placed at Papaenaena the remains of an adulterer - "all prepared in the customary manner of that time" (I'i 1959:50-51).

During the 1960s through the 1970s inadvertent burial finds were reported at construction sites stretching from the Fort DeRussy area to the foot of Diamond Head crater. In 1961 a human burial and a nineteenth century trash pit were unearthed during construction on Saratoga Road adjacent to Fort DeRussy. In 1963 human burials were discovered during construction activities at 2431 Prince Edward Street and at the site of the present Outrigger Canoe Club across from Kapiolani Park. Among the twenty-five burials - excavated by the Bishop Museum - were several discovered in flexed (with knees drawn up to the chin) or semi-flexed positions, traditional Hawaiian burial postures.

Sand dune burials - another traditional Hawaiian mortuary practice - were revealed in 1964 as beach sand fronting the Surfrider Hotel shifted and eroded.

The remains of six burials - five of apparent prehistoric or early historic age and one of more recent date - were unearthed in 1976 during construction of the Hale Koa Hotel adjacent to the Hilton Hawaiian Village Hotel.

Four years later, three burials were encountered at the Hilton Hawaiian Village itself during construction of the hotel's Tapa Tower. Earl Neller of the (then named) State Historic Preservation Program was called in upon discovery of the burials and conducted fieldwork limited to three brief inspections of the project area. Controlled excavations

were not possible. Neller's (1980) report, termed by him "an emergency field investigation to recover human remains", noted:

The bones from three Hawaiian burials were partially recovered; one belonged to a young adult male, one a young adult female, and one was represented by a single bone. An old map showed that rapid shoreline accretion had occurred in the area during the 1800s, and that the beach in the construction was not very old. It is possible the burials date back to the smallpox epidemic of 1853. It is likely that burials will continue to be found in the area. It is also possible that early Hawaiian sites exist farther inland, beneath Moiliili, adjacent to where the shoreline would have been 1000 years ago. (Neller 1980:5)

Neller also documented the presence of trash pits, including one from the 1890s which contained "a large percentage of luxury items, including porcelain tablewares imported from China, Japan, the United States, and Europe" (*ibid*:5). He further notes:

It is suspected that other important historic archaeological sites exist in the highly developed concrete jungle of Waikiki, with discrete, dateable trash deposits related to the different ethnic and social groups that occupied Waikiki over the last 200 years. (*ibid*:5)

Between December 1981 and February 1982, archaeologists from the Bishop Museum led by Bertell Davis conducted a program of excavations and monitoring during construction of the new Halekulani Hotel (Davis 1984). Six human burials were recovered along with "animal burials [and] cultural refuse from prehistoric Hawaiian firepits, and a large collection of bottles, ceramics, and other materials from trash pits and privies dating to the late 19th century" (*ibid*:i). Age analysis of volcanic glass recovered from the site led Davis to conclude: "For the first time we can now empirically date...settlement in Waikiki to no later than the mid-1600s" (*ibid*:i). Just as significant to Davis was the collection of historic era material at the Halekulani site; he states:

[The] Halekulani excavations clearly demonstrate...that there is a definite need to consider historic-period archaeology as a legitimate avenue of inquiry in Hawaiian research. Furthermore, archaeology in the urban context can yield results every bit as significant as in less developed areas. Development in the 19th and early 20th centuries clearly has not destroyed all archaeological resources in Waikiki, Honolulu, or in any of the other urbanized areas of Hawai'i. (*ibid*:i)

From January through December of 1983, Earl Neller of the State Historic Preservation Office conducted archaeological fieldwork during construction of the Lili'uokalani Gardens condominium on Paoakalani Street. The bones of seven individuals - all from prehistoric Hawaiian graves - were recovered at the site. Neller's report noted:

Queen Lili'uokalani had a bungalow at the project site, and broken glass and ceramic were collected that once was used by the Queen and her guests. There is a deeply buried cultural layer at the site that is older than the graves. (Neller 1984:i)

Neller recommended further work to develop a full-scale study of the material collected at the site; unfortunately, no such study was ever produced.

In 1987 State Historic Preservation Division archaeologists recovered a human burial at Kalakaua Avenue during renovation work on the Moana Hotel.

SUMMARY AND RECOMMENDATIONS

Cultural Surveys Hawaii's research suggests that the present study area is located in a region less extensively populated than the nearby centers of Waikiki and Honolulu by the Hawaiians inhabiting the southern coast of O'ahu before the nineteenth century. However, maps and documents produced during the nineteenth century indicate that the Kewalo region had been utilized for fishpond farming, salt making and wet-land agriculture by the Hawaiians. It is likely that evidences left behind by those involved in exploiting the area's resources remain intact beneath the modern landfill covering Kewalo today.

Excavations within downtown Honolulu and Kaka'ako have exposed trash and refuse pits associated with early to late nineteenth century urbanization of Honolulu which have expanded knowledge of urban Hawaiian life of the time. Cultural Surveys Hawaii's research suggests that the study area remained undeveloped until the 1940s and would not likely yield material related to the nineteenth century or early twentieth century development of Honolulu.

Previous and current archaeological studies within the nearby Kaka'ako area have documented the presence of human burials - of pre-contact and post-contact provenance. Burials have also been discovered in areas of Waikiki.

Based on these findings, Cultural Surveys Hawaii recommends that archaeological work should include subsurface test excavations following demolition of existing structures and preceding new construction. A sampling strategy for this testing should be worked out in coordination with the State Historic Preservation Division of the Department of Land and Natural Resources. A specific concern of the State Historic Preservation Division is the possible presence of wetland deposits which may contain information on paleoenvironments and Hawaiian archaeology. This concern may be

addressed by coring and subsequent pollen and dating analyses in the event that intact wetland deposits are encountered during test excavations.

If major findings are uncovered during testing, data recovery procedures would be the next step in mitigating impact on archaeological resources.

REFERENCES CITED

- Beckwith, Martha
1940 *Hawaiian Mythology*. New Haven: Yale University Press.
- Bingham, Hiram
1981 *A Residence of Twenty-One Years in the Sandwich Islands*. Charles E Tuttle Company: Rutland, Vermont.
- Boelen, Jacobus
1988 *A Merchant's Perspective: Captain Jacobus Boelen's Narrative of his Visit to Hawai'i in 1828*. Hawaiian Historical Society: Honolulu.
- Chamberlain, Levi
1957 "Tour Around Oahu: 1828." in *Sixty-fifth Annual Report of the Hawaiian Historical Society for the Year 1956*, pp. 25-41. Honolulu: Hawaiian Historical Society.
- Clark, Stephan
1987 *Archaeological Monitoring of the Makai Parking Garage, Corner of Punchbowl and Halekauwila Streets (TMK 2-1-31:23), Honolulu, O'ahu, State of Hawai'i*. B.P. Bishop Museum: Honolulu.
- Davis, Bertell
1984 *THE HALEKULANI HOTEL SITE: Archaeological and Historical Investigations in Waikiki, O'ahu, Hawai'i*. Honolulu: B.P. Bishop Museum.
- Emerson, N.B.
1902 "A Preliminary Report on a Find of Human Bones Exhumed in the Sands of Waikiki." in *Tenth Annual Report of the Hawaiian Historical Society for the Year 1901*, pp.18-20. Honolulu: Hawaiian Historical Society.
- Fitzpatrick, Gary
1986 *The Early Mapping of Hawai'i*. Honolulu: Editions Limited.
- Gilman, Gorman D.
1903 "Streets of Honolulu in the Early Forties," in Thomas G. Thrum (ed.), *Hawaiian Almanac and Annual for 1904*, Honolulu.
- Griffin, P. Bion, D.T.P. Keene, and J. Kennedy
1987 *Kaka'ako: Prediction of Sub-Surface Archaeological Resources, Kaka'ako Community Development District - Archaeological Reconnaissance Survey*. University of Hawaii.
- Handy, E.S., Craighill and Elizabeth G. Handy
1972 *Native Planters in Old Hawaii: Their Life, Lore, and Environment*. Honolulu: Bishop Museum Bulletin 23.

- I'i, John Papa
1959 *Fragments of Hawaiian History as Recorded by John Papa I'i.*
Honolulu: Bishop Museum Press.
- Indices...
1929 *Indices of Awards Made by the Board of Commissioners to Quiet
Land Titles in the Hawaiian Islands.* Honolulu: Commission on
Public Lands, Territory of Hawaii.
- Kotzebue, Otto von
1821 *A Voyage of Discovery, into the South Sea and Beering Straits, for the
Purpose of Exploring a North-east Passage Undertaken in the Years
1815-1818....* London: Longman, Hurst, Rees, Orme, and Brown.
- McAllister, J.G.
1933 *Archaeology of Oahu.* B.P. Bishop Museum Bulletin, No.104.
- Menzies, Archibald
1920 *Hawaii Nei 128 Years Ago.* Honolulu.
- Neller, Earl
1980 *The Kalia Burial Site #50-OA-2870: Rescue Archaeology in Waikiki,
Hawaii.* Honolulu: State Historic Preservation Program.
- Neller, Earl
1984 *An Informal Narrative Report on the Recovery of Human Skeletons
From a Construction Site in Waikiki on Paoakalani Street, Honolulu,
Hawaii.* Honolulu: State Historic Preservation Office.
- Stewart, C.S.
1970 *Journal of a Residence in the Sandwich Islands, During the Years
1823, 1824, and 1825.* Honolulu: University of Hawaii Press for the
Friends of the Library of Hawaii.
- Vancouver, George
1798 *A Voyage of Discovery to the North Pacific Ocean, and Round the
World...Performed in the years 1790-1795.* London: Robinson and
Edwards.

APPENDIX C

TRAFFIC STUDY

HALE KEWALO TRAFFIC STUDY

Prepared by

WILBUR SMITH ASSOCIATES

HALE KEWALO TRAFFIC STUDY

Prepared by
WILBUR SMITH ASSOCIATES

May 5, 1992

CONTENTS

SECTION		PAGE
1	INTRODUCTION	1-1
2	EXISTING CONDITIONS	2-1
	Roadway System	2-1
	Traffic Conditions	2-1
	Traffic Counts	2-1
	Level of Service Concept	2-2
	Existing Levels of Service	2-2
3	PROPOSED PROJECT	3-1
	Trip Generation	3-1
	Trip Distribution and Assignment	3-2
4	FUTURE CONDITIONS	4-1
	Anticipated 1994 Conditions Without The Project	4-1
	Anticipated 1994 Conditions With The Project	4-2
	Impact of Reversal of One-Way Street Operation	4-3
5	CONCLUSIONS AND RECOMMENDATIONS	5-1
	Project Mitigation Measures	5-1
	Other Potential Improvements	5-1

ILLUSTRATIONS

FIGURE		FOLLOWS PAGE
1-1	Project Location	1-1
2-1	Study Area	2-1
2-2	Existing Traffic Volumes: AM Peak Hour	2-2
2-3	Existing Traffic Volumes: PM Peak Hour	2-2
2-4	Level of Service Concept Diagram	2-2
4-1	Future Traffic Volumes Without Project: AM Peak Hour	4-1
4-2	Future Traffic Volumes Without Project: PM Peak Hour	4-1
4-3	Future Traffic Volumes With Project: AM Peak Hour	4-2
4-4	Future Traffic Volumes With Project: PM Peak Hour	4-2

TABULATIONS

TABLE		PAGE
2-1	Existing Intersection Levels of Service	2-2
3-1	Trip Generation Rates	3-2
3-2	Trip Generation Estimates	3-2
3-3	Anticipated Trip Distribution	3-3
4-1	Future Anticipated Level of Service Conditions Without the Project	4-2
4-2	Future Site Traffic Volumes	4-2
4-3	Future Anticipated Level of Service Conditions With the Project	4-3

INTRODUCTION

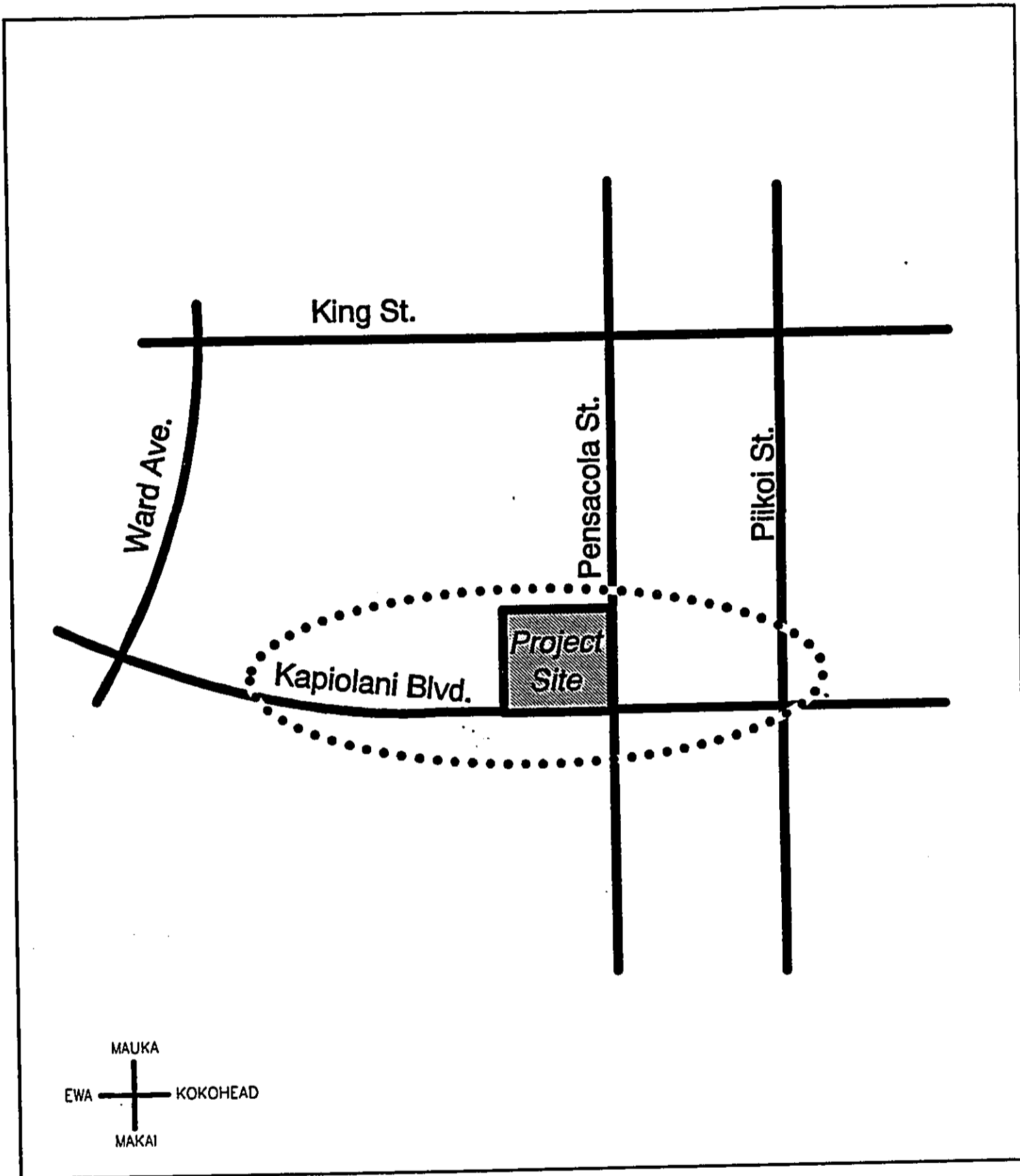
INTRODUCTION

The Hale Kewalo Project is a mixed-use development planned for the old Pensacola Street campus of Kapiolani Community College. The project is to include twin residential towers with a total of 529 rental units, approximately 22,000 square feet of office space for community college use and a parking structure with approximately 629 parking spaces.

The study area for the project (Figure 1-1) includes Pensacola Street adjacent to the site, and the intersections of Kapiolani Boulevard with Pensacola Street and Piikoi Street. The purpose of this traffic study is to determine the impact of the project on future traffic conditions in the area, both with the existing traffic pattern and with the proposed reversal of traffic flow on the Pensacola-Piikoi Streets one-way couplet.

This report is presented in five chapters, each highlighting the following information:

- **Chapter 1 - Introduction** describes the study purpose and scope as well as summarizing the report format;
- **Chapter 2 - Existing Conditions** describes the present traffic operations in the Study Area;
- **Chapter 3 - Proposed Project** presents the trip generation, distribution and assignment characteristics of the proposed development;
- **Chapter 4 - Future Conditions** describes future traffic conditions with and without the proposed development for two network scenarios -- existing and with the proposed reversal of traffic flow on the one-way couplet; and
- **Chapter 5 - Conclusions and Recommendations** identifies the anticipated project impacts, defines any necessary mitigation measures and summarizes the study conclusions.



Legend:
 ●●●● Study Area Boundary

Figure 1-1
 PROJECT LOCATION

EXISTING CONDITIONS

EXISTING CONDITIONS

The project is located in the mauka-ewa corner of the intersection of Kapiolani Boulevard and Pensacola Street. Mauka and ewa of the project site is McKinley High School and its athletic fields. All but one of the existing buildings on the project site will be razed. The one building to remain previously temporarily housed the Hawaii State Library, but is presently unoccupied. The other existing buildings are used by the Educational Training Office. At present, the site has 190 parking spaces used by the Educational Training Office, and 72 spaces adjacent to the McKinley driveway.

Roadway System

The principal road network serving the site is shown in Figure 2-1. **Kapiolani Boulevard** is a major arterial serving ewa-kokohead direction traffic through the Kakaako and Moiliili sections of Honolulu. There are three travel lanes in each direction, although during the morning and afternoon weekday peak periods it is coned to provide an additional lane in the peak travel direction. The intersections of Kapiolani Boulevard with Pensacola and Piikoi Street are both controlled by traffic signals.

Pensacola Street and Piikoi Street form a one-way couplet for makai- and mauka-bound traffic respectively. Mauka of Kapiolani Boulevard, both streets accommodate four travel lanes and allow parking on both sides of the street. Makai of Kapiolani Boulevard, Pensacola Street provides two makai-bound travel lanes and a parking lane, while Piikoi Street has two-way traffic flow. At the Kapiolani Boulevard intersection, the Piikoi Street approach has three through lanes plus separate left-turn and right-turn lanes.

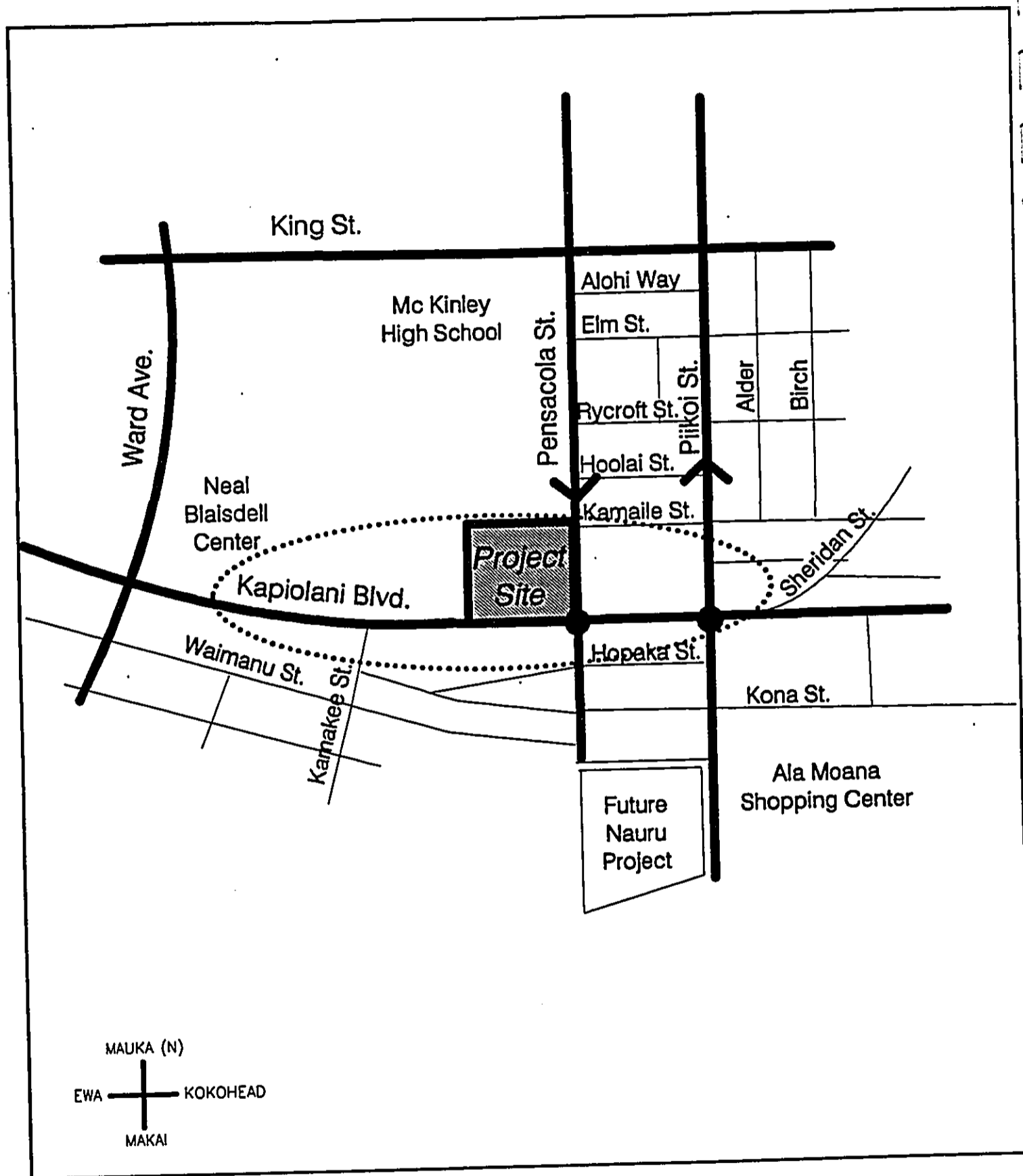
There are turn restrictions at the two signalized intersections during peak periods. Kokohead-bound left turns from Kapiolani Boulevard to Piikoi Street are prohibited from 6:30 - 8:30 a.m. while ewa-bound left turns from Kapiolani Boulevard to both makai-bound Piikoi and Pensacola Streets are prohibited in the afternoon from 3:30 - 5:30 p.m.

Parking is prohibited on Kapiolani Boulevard in this area from 6 a.m. to 6:30 p.m.

Access to the main parking lot (190 spaces) is currently provided by a single driveway along Pensacola Street about 250 feet mauka of Kapiolani Boulevard. Only right-turns in and right-turns out are permitted due to the one-way circulation system. The two small lots (72 spaces) serving the temporary State Library are accessed via the McKinley High School driveway.

Traffic Conditions

Traffic Counts - The existing conditions analysis is based on the most recently available traffic count information. These counts reasonably depict present 1992 conditions. Information is presented for both the morning (7:15 - 8:15 a.m.) and evening (4:30 - 5:30 p.m.) peak hours.



- Legend:
- Study Area Boundary
 - Signalized Intersection

Figure 2-1
STUDY AREA

EXISTING CONDITIONS

Figures 2-2 and 2-3 indicate the morning and evening peak-hour traffic volumes respectively. Kapiolani Boulevard carries a maximum of 1,210 ewa-bound to 2,430 kokohead-bound vehicles per hour during the busier evening peak hour. In the morning peak hour, the peak direction is ewa-bound and the peak-hour peak-direction volume is 2,285 vehicles.

Both Pensacola and Piikoi Streets are more heavily used in the evening. Pensacola Street accommodates approximately 1,230 vehicles and Piikoi Street 1,850 vehicles per hour during the PM peak hour.

Level of Service Concept - Traffic congestion can be described in terms of a level of service (LOS) concept. This involves assigning a letter designation (LOS A to LOS F) to an intersection depending on the results of quantitative analyses. LOS A represents the best of conditions while LOS F represents severe congestion. These qualitative measures are further illustrated in Figure 2-4. Each level of service category corresponds to a range of anticipated delay encountered by the average driver passing through the intersection. Another measure depicted in the analyses is the volume-capacity ratio. This ratio is a measure of the critical lane flows compared to the overall theoretical capacity of an intersection. The operations and design methodology as presented in the Highway Capacity Manual form the basis for calculating the intersection levels of service found in this document.

Existing Levels of Service - Table 2-1 summarizes the calculated average delay per vehicle, the volume-capacity ratio and the level of service for each of the two signalized study intersections. Both intersections operate with acceptable conditions, at LOS C or better, and these findings have been verified by actual field observations.

**Table 2-1
EXISTING INTERSECTION LEVELS OF SERVICE**

INTERSECTION	AM PEAK HOUR			PM PEAK HOUR		
	Delay	V/C	LOS	Delay	V/C	LOS
Kapiolani/Pensacola	12	.61	B	14	.73	B
Kapiolani/Piikoi	11	.63	B	19	.89	C

(Note: Delay is in seconds.)

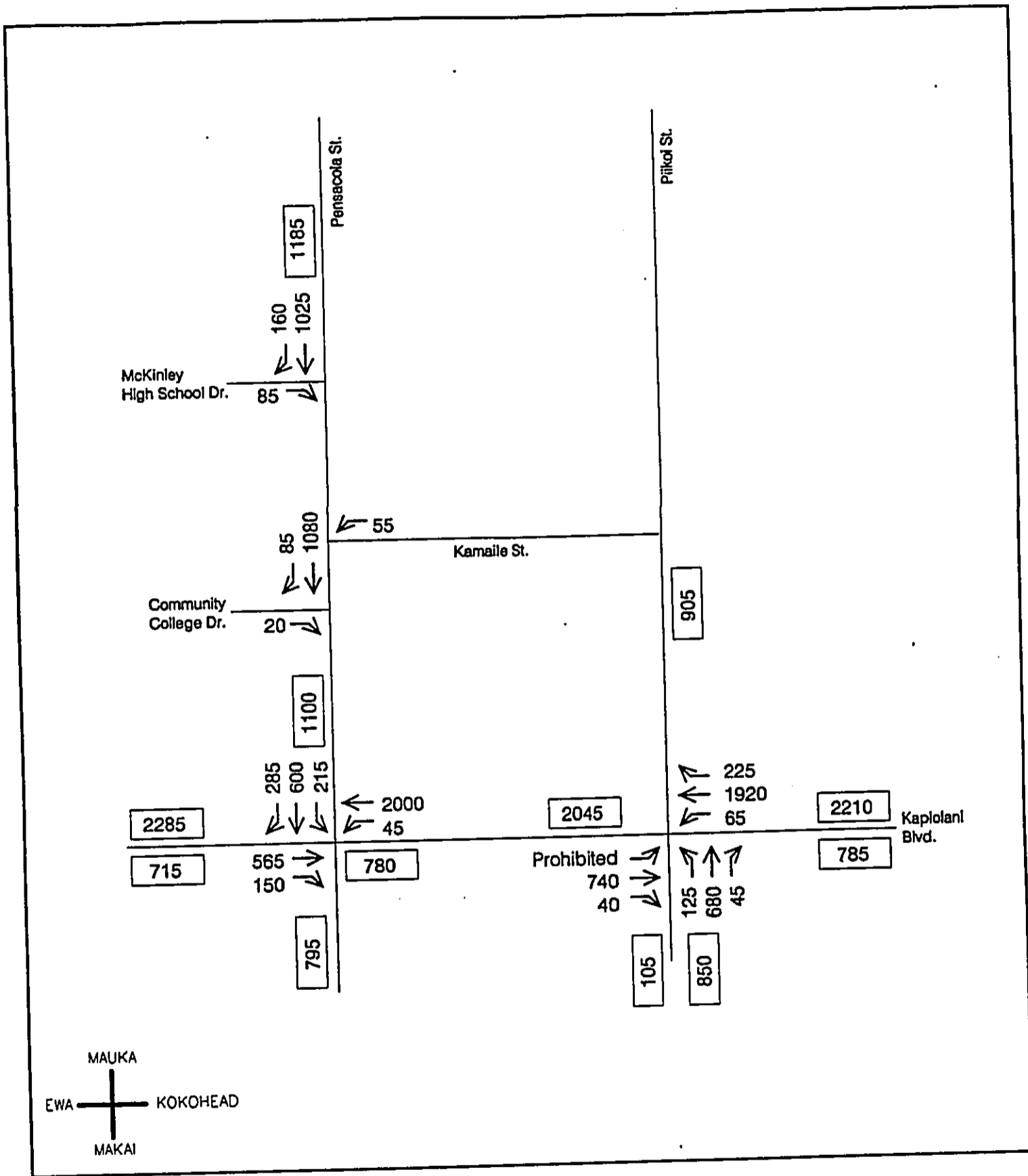


Figure 2-2
EXISTING TRAFFIC VOLUMES
A.M. PEAK HOUR

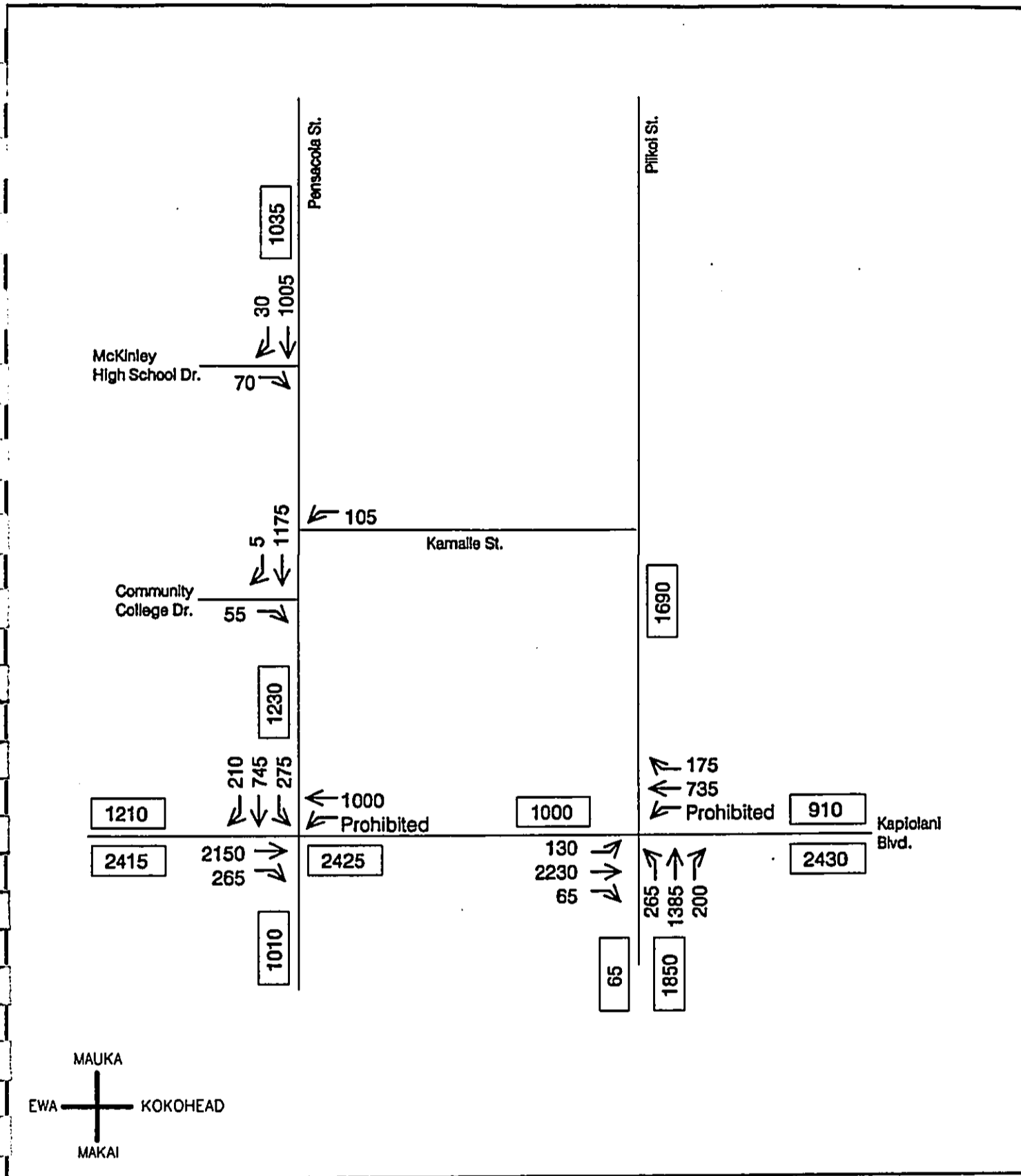


Figure 2-3
 EXISTING TRAFFIC VOLUMES
 P.M. PEAK HOUR

The OPERATIONS LEVEL METHODOLOGY, which is described in the Transportation Research Board's *Highway Capacity Manual*, defines Level of Service (LOS) for signalized intersections in terms of delay. Technically, delay is the amount of time an average vehicle must wait at an intersection before being able to pass through the intersection. For signalized intersections, the relationship between LOS and delay is based on the average stopped delay per vehicle for a fifteen minute period.

LEVEL OF SERVICE 'A' - Delay 0.0 to 5.0 seconds

Describes operations with very low delay, i.e., less than 5 seconds per vehicle. This occurs when signal progression is extremely favorable. Most vehicles arrive during the green phase and are not required to stop at all.

Corresponding V/C ratios usually range from 0.00 to 0.60.

LEVEL OF SERVICE 'B' - Delay 5.1 to 15.0 seconds

Describes operations with delay in the range of 5 to 15 seconds per vehicle generally characterized by good signal progression and/or short cycle lengths. More vehicles are required to stop than for LOS 'A' causing higher levels of average delay.

Corresponding V/C ratios usually range from 0.61 to 0.70.

LEVEL OF SERVICE 'C' - Delay 15.1 to 25.0 seconds

Describes operations with delay in the range of 15 to 25 seconds per vehicle. Occasionally, vehicles may be required to wait more than one red signal phase. The number of vehicles stopping at this level is significant although many still pass through the intersection without stopping.

Corresponding V/C ratios usually range from 0.71 to 0.80.

LEVEL OF SERVICE 'D' - Delay 25.1 to 40.0 seconds

Describes operations with delay in the range of 25 to 40 seconds per vehicle. At LOS 'D', the influence of congestion becomes more noticeable. Many vehicles stop, and the proportion of vehicles not stopping declines. The number of vehicles failing to clear the signal during the first green phase is noticeable.

Corresponding V/C ratios usually range from 0.81 to 0.90.

LEVEL OF SERVICE 'E' - Delay 40.1 to 60.0 seconds

Describes operations with delay in the range of 40 to 60 seconds per vehicle. These high delay values generally indicate poor signal progression, long cycle lengths and high V/C ratios. Vehicles frequently fail to clear the intersection during the first green phase.

Corresponding V/C ratios usually range from 0.91 to 1.00.

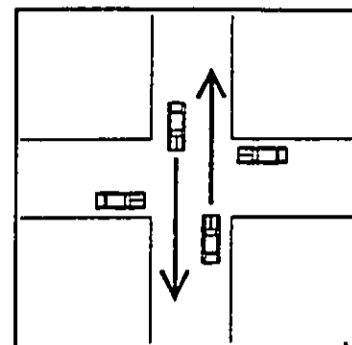
LEVEL OF SERVICE 'F' - Delay 60.1 seconds plus

Describes operations with delay in excess of 60 seconds per vehicle. This condition often occurs with oversaturation, i.e., when arrival flow rates exceed the capacity of the intersection.

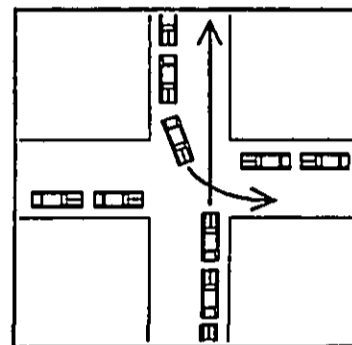
Corresponding V/C ratios of over 1.00 are usually associated.

SOURCE: Transportation Research Board, "Operations Level Methodology-Signalized Intersections", *Highway Capacity Manual*, Special Report 209, 1985.

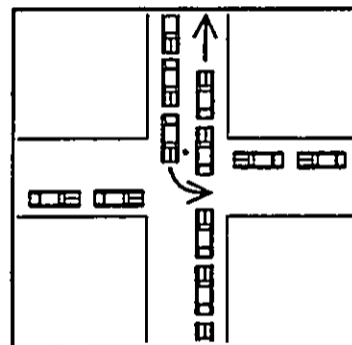
LOS-HCS-1/21/92CRL



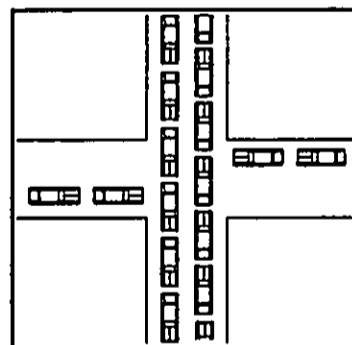
LOS 'A'



LOS 'C'



LOS 'D'



LOS 'F'

Figure 2-4
LEVEL OF SERVICE CONCEPT DIAGRAM

PROPOSED PROJECT

PROPOSED PROJECT

The Hale Kewalo residential project is planned for completion and occupancy by the Fall of 1994. The project site will include the following:

- Two residential towers, with 259 units in one tower intended for housing University of Hawaii faculty, and 270 units in the other tower intended for rental to moderate income households;
- Approximately 22,000 square feet of floor area for use by the Employment Training Office (ETO), with most of the space to be used for offices, along with four classrooms for vocational training courses;
- The large existing building at the mauka end of the site, located adjacent to the McKinley High School driveway; and
- A parking structure with approximately 629 stalls, plus approximately 78 stalls in surface lots along Pensacola Street.

The large building to remain, which was temporarily used to house the State Library, will be used by the Department of Education. The other buildings on the site, with 50,000 square feet of office and classroom space, will be razed.

Access to the residential complex and Employment Training Office facility will be provided via a driveway at or near the present driveway to the project site. Parking for the residential complex will be located in the parking structure, while the Employment Training Office will be allocated 10 parking spaces in the garage and 42 stalls in the adjacent surface lot.

Access to the remaining Department of Education building will be via the McKinley driveway. This building will be assigned 36 parking stalls in surface lot plus 50 stalls within the parking structure.

Trip Generation

There are three key components of the future traffic to be generated by the site development. These are:

- the twin residential towers;
- the 22,000 square feet of vocational school space to be provided at the site; and
- the occupancy of the one existing building to remain, which is currently unoccupied.

The vehicle trip generation for the residential tower is based on the rate provided by the Institute of Transportation Engineers (ITE) Trip Generation Manual. The rates for the existing building and the proposed new office and classroom area are based on the estimate of number of parking spaces available for the employees/students. The directional split (in/out) reflected in these rates is 89%/11% and 17%/83% in AM and PM peak hour respectively. The rates are shown in Table 3-1.

**Table 3-1
TRIP GENERATION RATES**

PROJECT COMPONENT	TYPE OF UNIT	NUMBER OF UNITS	RATES			
			AM PEAK		PM PEAK	
			TO	FROM	TO	FROM
Apartment Complex	Apartments	529	0.08	0.23	0.21	0.14
Vocational School	Parking Space	52	0.58	0.07	0.11	0.54
Remaining Building	Parking Space	86	0.58	0.07	0.11	0.54

These assumptions result in an estimated 250 AM peak hour trips and 275 PM peak hour trips being associated with the new development, as shown in Table 3-2. The net increase in traffic due to the project, considering traffic from the displaced activities, is discussed in Chapter 4.

**Table 3-2
TRIP GENERATION ESTIMATES**

PROJECT COMPONENT	AM PEAK HOUR			PM PEAK HOUR		
	TO SITE	FROM SITE	TOTAL TRIPS	TO SITE	FROM SITE	TOTAL TRIPS
Apartment Complex	40	120	160	110	75	185
Vocational School	30	5	35	5	30	35
Remaining Building	50	5	55	10	45	55
TOTAL PROJECT	120	130	250	125	150	275

Trip Distribution and Assignment

The one-way street system results in some circuitous routing of traffic to and from the site. The general directional distribution of project traffic to and from the site is based on travel patterns from the Hali 2005 Study, and is summarized in Table 3-3. The actual assignment of traffic to the adjacent road system is indicated in the future traffic flows presented in Chapter 4.

Table 3-3
ANTICIPATED TRIP DISTRIBUTION

DIRECTION/STREET	AM PEAK HOUR				PM PEAK HOUR			
	TO SITE		FROM SITE		TO SITE		FROM SITE	
	%	No.	%	No.	%	No.	%	No.
Ewa: Kapiolani Blvd	3	4	40	52	3	4	34	51
King St	25	30			25	31		
Mauka: Piikoi St			9	12			9	14
Pensacola St	30	36			36	45		
Kokohead: Kapiolani Blvd	19	23	22	29	12	15	28	42
King St/Local	6	7	11	14	8	10	5	7
Makai: Piikoi St	17	20	18	23	16	20	24	36
TOTAL TRAFFIC	100	120	100	130	100	125	100	150

FUTURE CONDITIONS

FUTURE CONDITIONS

The principal focus of the future conditions analyses is the anticipated impact of the project on status quo street operations, namely the existing operation of the one-way Pensacola and Piikoi Streets couplet. In order to assess the impact of the project, it is necessary to estimate future conditions both with and without the proposed project.

Anticipated 1994 Conditions Without The Project

No roadway improvements are expected to occur on the streets in the Study Area. In terms of traffic growth, it was assumed that background traffic would grow at a compounded rate of 2% per year. In addition, the presently vacant building on the site is expected to be occupied. This building is common to both the "without" and "with" project scenarios.

Outside the study area, there is a proposed project that would have a direct impact on local traffic flows. This project, developed by Nauru Phosphate Royalties Trust Company, is located at the intersection of Piikoi Street and Ala Moana Boulevard. It will be constructed in four phases. Phase I with 320 condominiums is built, but not yet occupied. Demolition of existing buildings on the Phase II site, which is expected to have an additional 430 units and some commercial development, is underway and occupancy is possible by Fall 1994. The generated trips associated with this project were assigned to the two study intersections and added to the future background condition. Total trips associated with this development are estimated to be as follows:

- AM Peak Hour: To Site 90
From Site 245
- PM Peak Hour: To Site 280
From Site 170

Generally about 60% of the Naura project trips are expected to travel through the study area.

Applying these assumptions about future development patterns and traffic growth to the existing counts presented in Chapter 2 results in the traffic volumes presented in Figures 4-1 and 4-2 for the AM and PM peak hours respectively. The most significant change is expected to occur on Piikoi Street in the evening peak hour where volumes are expected to increase by 180 vehicles per hour per direction. The level of service analyses indicate that no significant change in traffic conditions is expected due to the small change in traffic volumes, although the V/C ratio at the Kapiolani Boulevard and Piikoi Street intersection is over 0.9. The results of the level of service analyses are summarized in Table 4-1.

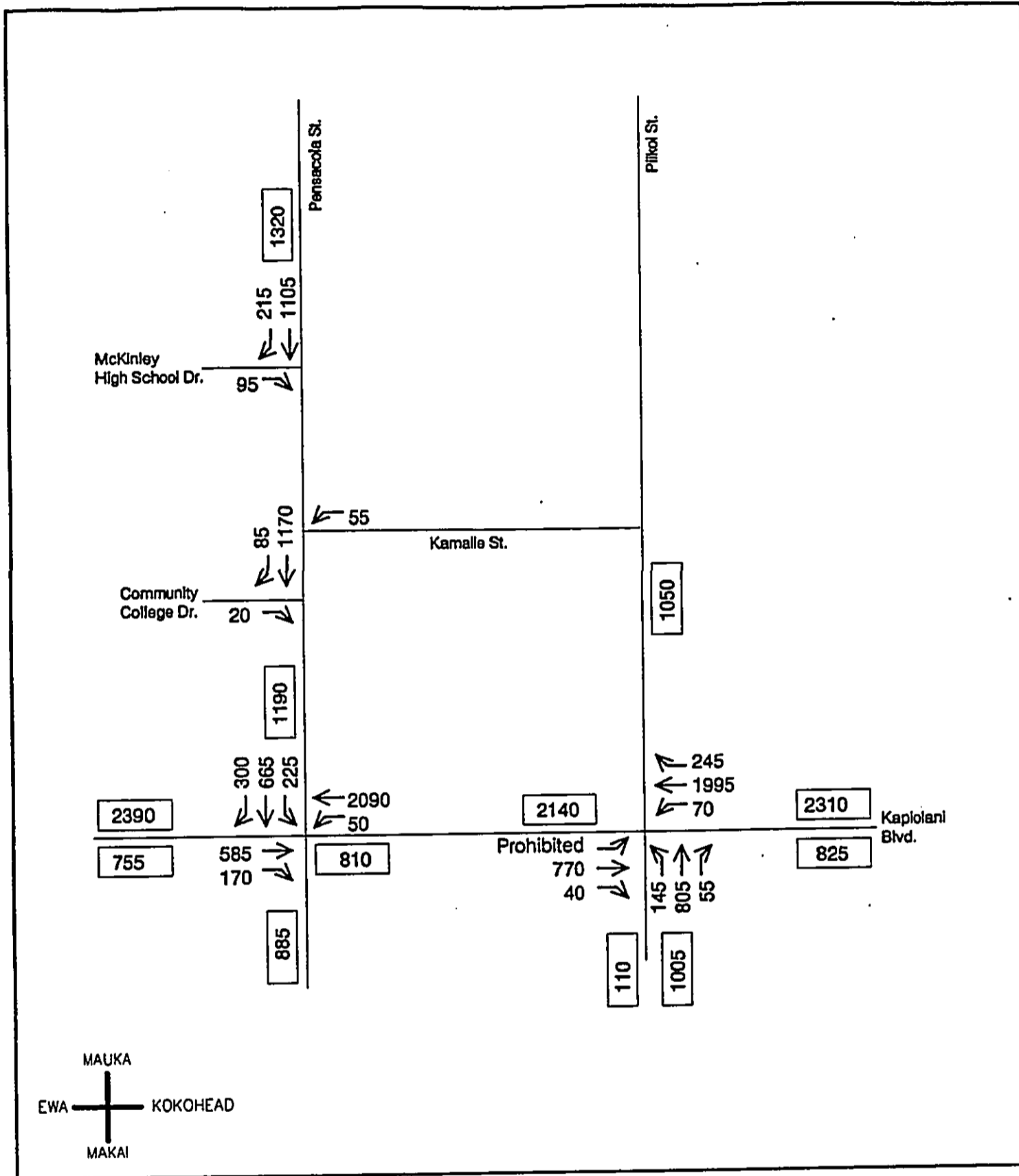


Figure 4-1
 FUTURE TRAFFIC VOLUMES WITHOUT PROJECT
 A.M. PEAK HOUR

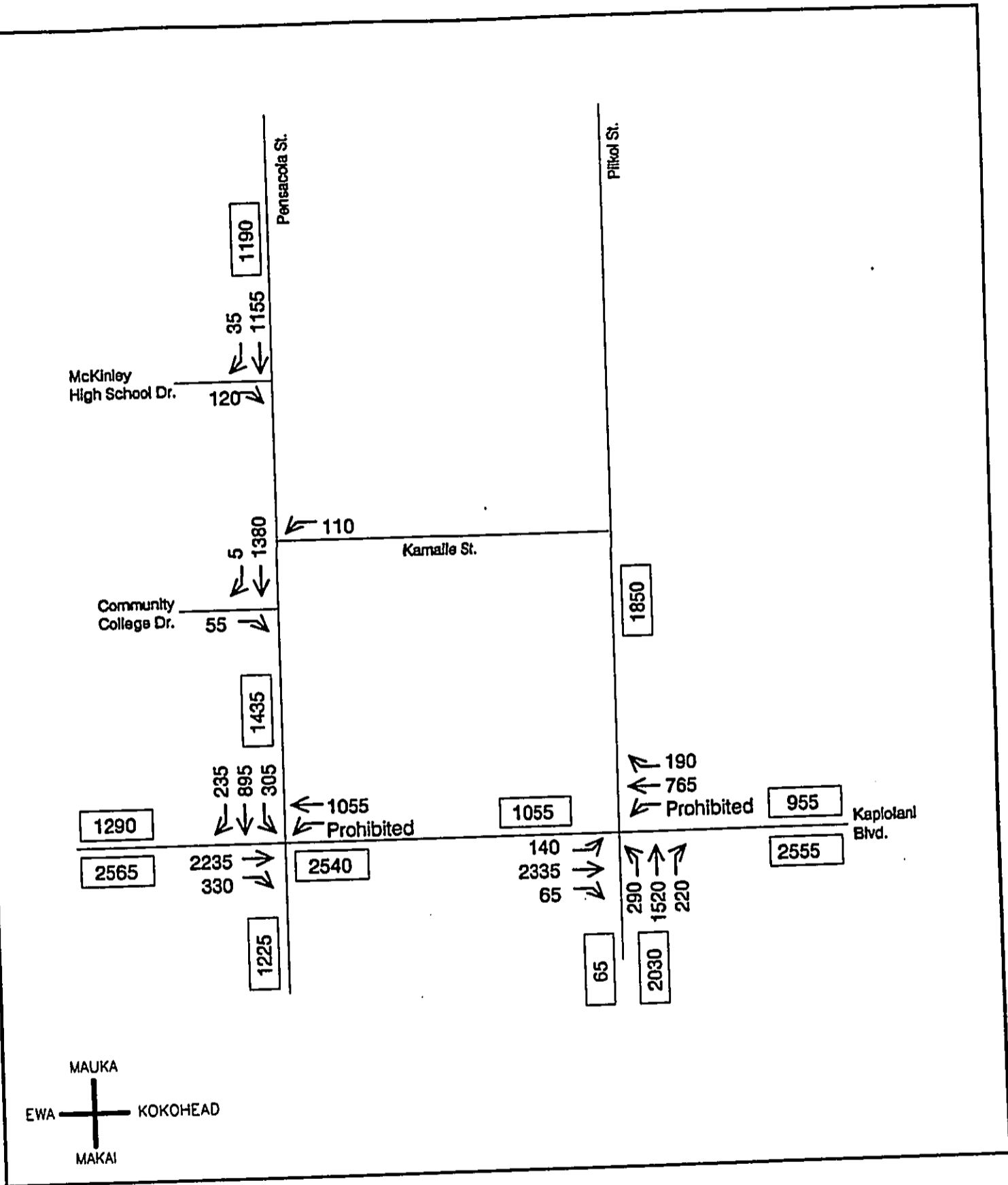


Figure 4-2
 FUTURE TRAFFIC VOLUMES WITHOUT PROJECT
 P.M. PEAK HOUR

FUTURE CONDITIONS

**Table 4-1
FUTURE ANTICIPATED LEVEL OF SERVICE CONDITIONS WITHOUT THE PROJECT**

INTERSECTION	AM PEAK HOUR			PM PEAK HOUR		
	Delay	V/C	LOS	Delay	V/C	LOS
Kapiolani/Pensacola	13	.65	B	24	.81	C
Kapiolani/Piikoi	12	.68	B	23	.96	C

(Note: Delay is in seconds.)

Anticipated 1994 Conditions With The Project

Figures 4-3 and 4-4 depict the anticipated 1994 AM and PM peak hour traffic volumes, respectively, with the proposed project in place. It is important to note that little overall change is expected and under some circumstances (depending on the time period and travel direction) there is expected to be less traffic on the adjacent roadway than if the project was not developed. This is essentially due to the fact that the residential towers are expected in some circumstances to generate less trips than currently being generated by the office space that will be displaced. Table 4-2 summarizes total site traffic volumes with and without the development.

**Table 4-2
FUTURE SITE TRAFFIC VOLUMES**

PROJECT COMPONENT	WITHOUT PROPOSED PROJECT				WITH PROPOSED PROJECT			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	To	From	To	From	To	From	To	From
Apartments					40	120	110	75
Vocational School					30	5	5	30
Existing Building to Remain	50	5	10	45	50	5	10	45
Buildings to be Removed	85	20	5	55				
TOTAL TRAFFIC	135	25	15	100	120	130	125	150
CHANGE IN TRAFFIC					-15	105	110	50

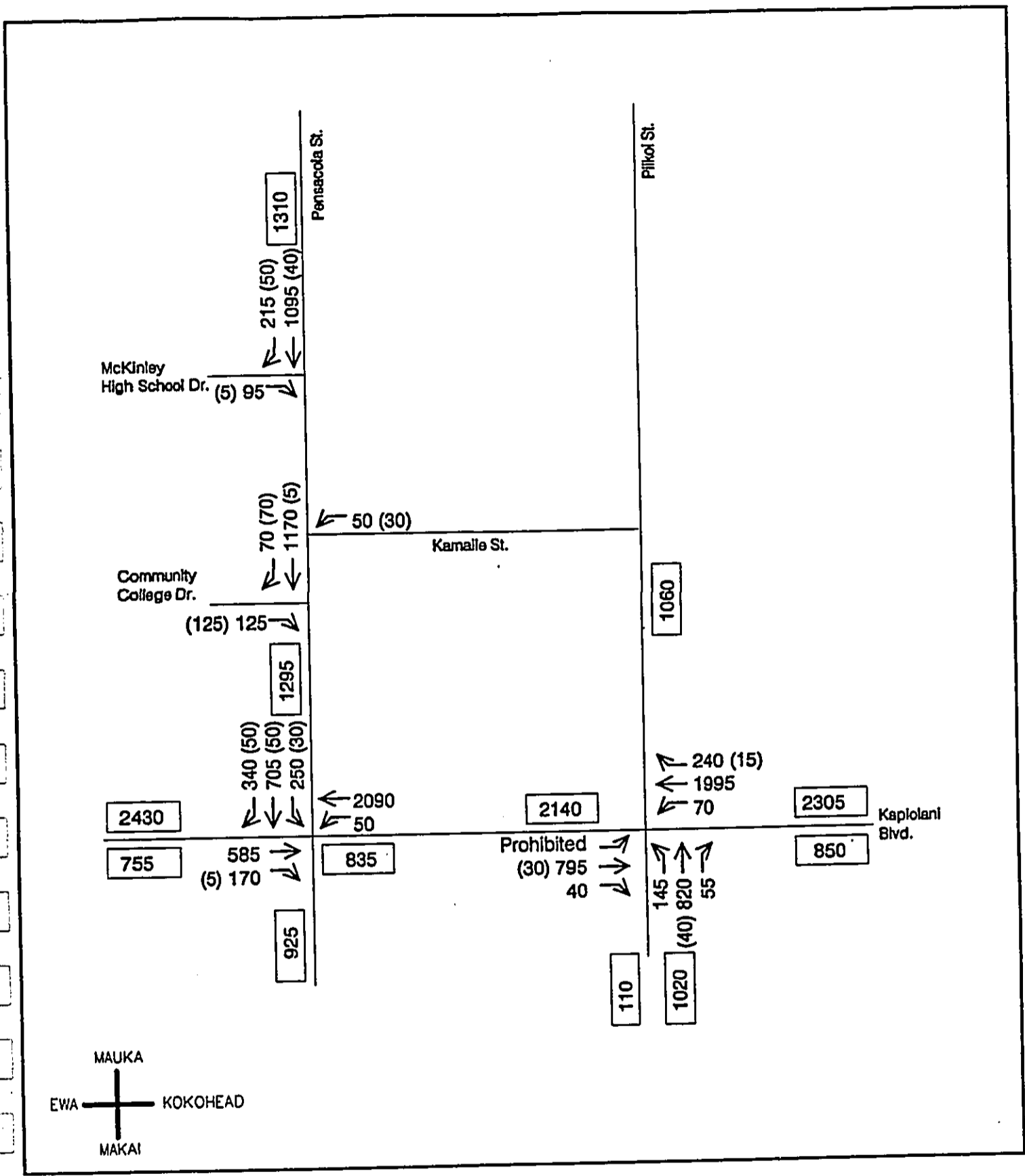


Figure 4-3
FUTURE TRAFFIC VOLUMES WITH PROJECT
A.M. PEAK HOUR

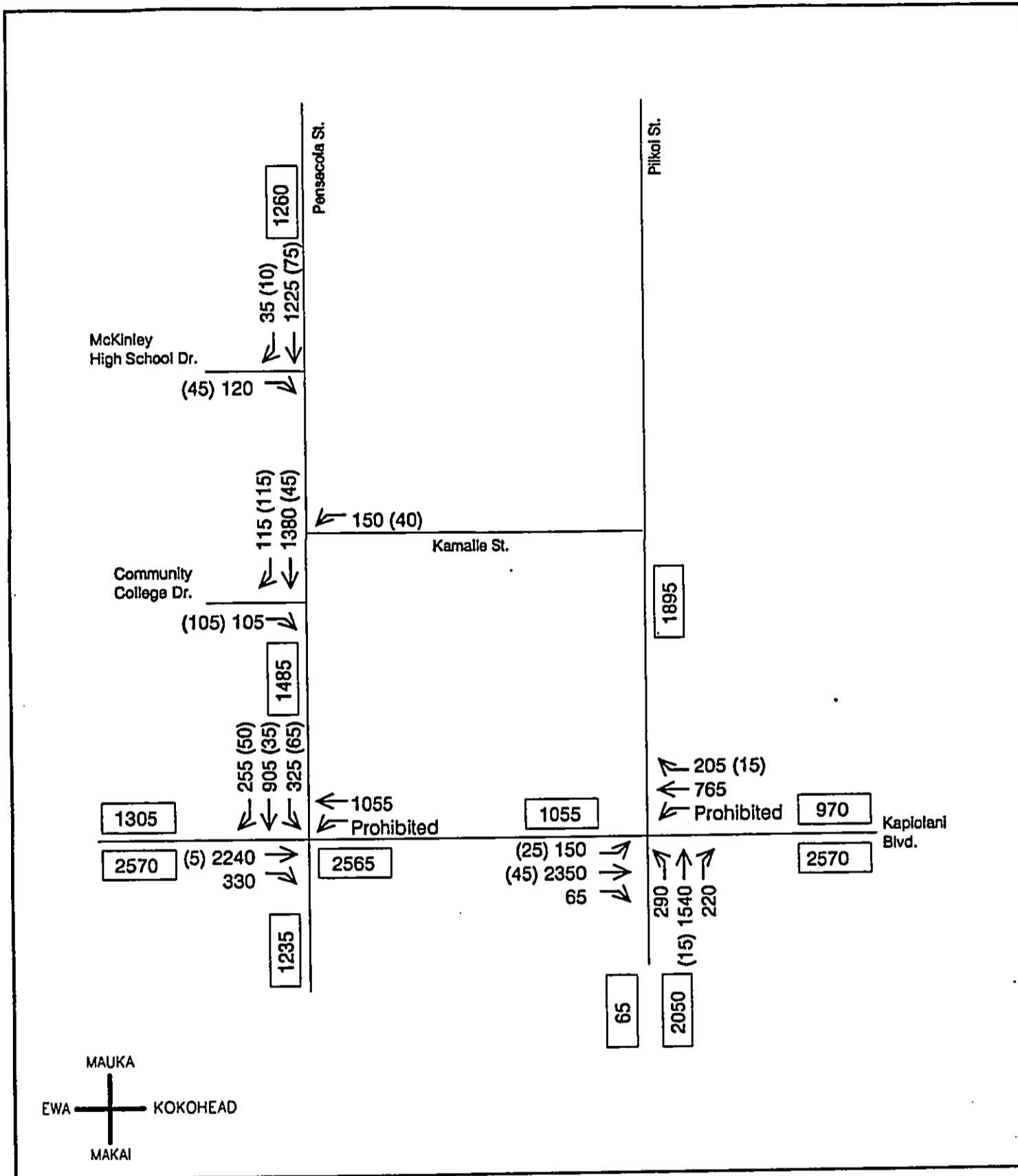


Figure 4-4
FUTURE TRAFFIC VOLUMES WITH PROJECT
P.M. PEAK HOUR

FUTURE CONDITIONS

Anticipated future traffic conditions are summarized in Table 4-3. With no more than 160 vehicles being added to the road system in a single hour, and these vehicles being dispersed through the network, there should be only minor changes in traffic conditions. The Kapiolani Boulevard and Pensacola Street intersection is expected to have LOS D operations in the evening peak, but this is at the low end of LOS D, since overall vehicle delay increased only 2 seconds and the V/C ratio rose to only 0.82 from 0.81. Implications of these changes are addressed in Chapter 5.

**Table 4-3
FUTURE ANTICIPATED LEVEL OF SERVICE CONDITIONS WITH THE PROJECT**

INTERSECTION	AM PEAK HOUR			PM PEAK HOUR		
	Delay	V/C	LOS	Delay	V/C	LOS
Kapiolani/Pensacola	15	.68	C	26	.82	D
Kapiolani/Piikoi	12	.69	B	24	.97	C

(Note: Delay is in seconds.)

The project will also add to traffic along the block of Kamaile Street between Piikoi and Pensacola Streets. As depicted in Figure 4-3, the addition of 30 project vehicles to the low AM peak hour volumes should not effect traffic conditions. In the PM peak hour (Figure 4-4), the project would add 40 vehicles, but to a much higher volume that results from other land uses in the area.

The traffic assessment indicates that the left-turn movement from Kamaile Street should operate at an acceptable level during both peak hours. However, adequate sight distance is essential, particularly for project traffic which must weave across to the far lane to access the project driveway. At present, parking is restricted along the kokohead side of Pensacola Street for almost one-half of the block length mauka of Kamaile Street. Restriction of the one additional stall located at mid-block would extend the restriction almost the full block given the driveways in this section, and significantly improve the existing sight distance. In any event, the existing no parking restriction should be actively enforced; field observations noted illegally parked vehicles in the restricted area on several occasions, which severely limited the sight distance available to vehicles exiting Kamaile Street.

Impact of Reversal of One-Way Street Operation

A report prepared for the Oahu Metropolitan Planning Organization in May 1991 on the impact of the reversal of travel directions for the Pensacola/Piikoi Streets couplet concluded that the change in street operation would benefit overall operations and that anticipated conditions at the two study area intersections would not change significantly, as both intersections would operate with LOS C conditions or better during the peak hours. Final design of entrances/exits to the project should take into account the possible reversal of operation and, therefore, turning lane requirements.

FUTURE CONDITIONS

The reversal of travel directions of the two streets would likely have a neutral to slightly negative effect on access to the project site. Project traffic outbound to Kapiolani Boulevard would have to weave across the four Pensacola Street lanes to reach Kamaile Street for access to Piikoi Street and points makai. There would likely be fewer long gaps in the Pensacola Street traffic to make this maneuver between the project and Kamaile Street with the street maukabound due to the large volume of traffic turning maukabound from Kapiolani Boulevard during the red signal phase on Pensacola Street. Also, the reversal would result in the path of entering traffic crossing the path of exiting traffic at the driveway, which does not occur with the existing travel direction on the couplet.

It is recommended that on-street parking be prohibited, along the ewa-side curb on either side of the driveway in either case. This is to provide adequate sight distance and an acceleration-deceleration section.

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS AND RECOMMENDATIONS

The key intersections impacted by the project are expected to operate at acceptable levels of service for weekday peak traffic periods. The project itself should not significantly change traffic conditions. The anticipated changes from existing traffic conditions are caused principally by the Nauru project, the expected occupancy of the Education Department building, and overall general traffic growth.

Project Mitigation Measures

Several modifications are recommended to improve traffic operations along Pensacola Street at the project site:

1. On-street parking should be removed from the ewa-side of Pensacola Street along the project frontage. This would provide a deceleration lane for traffic turning into the site driveway, and improve sight distance for traffic exiting the driveway. This would eliminate 10 to 12 parking spaces. Observations indicate that most of these spaces are used by employees of businesses makai of Kapiolani Boulevard and by students.
2. The one midblock on-street parking section along the kokohead side of Pensacola Street in the block mauka of Kamaile Street should be eliminated to improve the sight distance for vehicles exiting Kamaile Street. This would improve the sight distance and safety for both those vehicles enroute to the site, as well as other vehicles, which use this block of Kamaile Street.

Other Potential Improvements

The Hale Kewalo project is not expected to significantly change traffic volumes or conditions in the Study Area. Although both Kapiolani Boulevard intersections are anticipated to have acceptable levels of service in the future (LOS D or better in the peaks), there are some low-cost operational improvements that could improve overall operations. These include restriping to change lane configurations, traffic signal retiming and turn prohibitions.

1. Traffic signal timings at the Kapiolani Boulevard intersections with Pensacola and Piikoi Streets should be revised to reflect future changes in traffic volumes in the area.
2. To improve overall operation of the Kapiolani Boulevard and Piikoi Street intersection, consideration should be given to reconfiguring the Piikoi Street approach to convert the existing exclusive left-turn lane to a shared through/left-turn lane to provide more capacity for the through movement.
3. Prohibiting left turns from the kokohead-bound approach of Kapiolani Boulevard onto Piikoi Street during the PM peak (It is already prohibited in the morning peak) would increase the overall capacity and reduce vehicle delay at this signalized intersection. This left-turn movement could be made by turning right onto Pensacola Street and using Waimanu Street to reach Piikoi Street.

HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST
 Analyst: VIJAY SINHA File Name: AMEX.HC9
 Area Type: Other 4-3-92 AM
 Comment: EXISTING CONDITIONS

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	2	<		>	4					1	2	1
Volumes	565		150	45	2000					215	600	285
Lane Width	10.0			11.0						14.0	10.0	14.0
RTOR Vols			0			0						30

Signal Operations

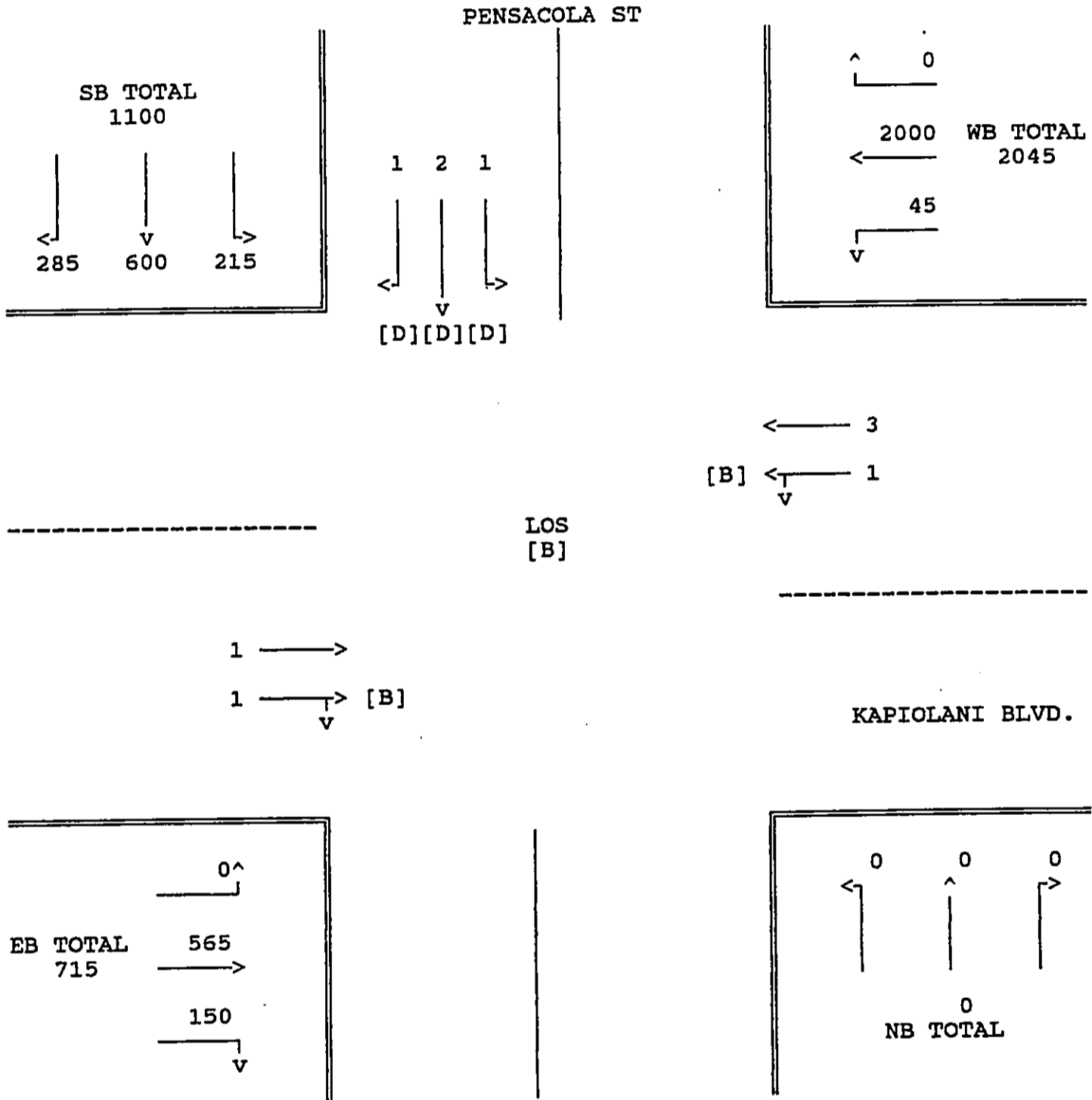
Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds			
WB Left	*				SB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	65P				Green	25P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		
Cycle Length: 100 secs Phase combination order: #1 #5								

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
Mvmts	Cap	Flow	Ratio	Ratio					
EB	TR	3130	2097	0.38	0.67	5.6	B	5.6	B
WB	LT	6433	4310	0.55	0.67	6.7	B	6.7	B
SB	L	1439	389	0.58	0.27	25.6	D	28.3	D
	T	3315	895	0.74	0.27	27.7	D		
	R	1297	350	0.77	0.27	32.1	D		
Intersection Delay = 12.3 (sec/veh)					Intersection LOS = B				

INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PENSACOLA ST
 Time period:



HCM: SIGNALIZED INTERSECTION SUMMARY
Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD.
Analyst: VIJAY SINHA
Area Type: Other
Comment: EXISTING CONDITIONS

(N-S) PIIKOI STREET
File Name: KAPIAMEX.HC9
4-3-92 AM

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	2	<		>	4	<	1	3	1			
Volumes	740		40	65	1920	225	125	680	45			
Lane Width	10.0			10.0			10.0	10.0	12.0			
RTOR Vols			0			0			0			

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					*			
Thru	*				*			
Right	*				*			
Peds	*				*			
WB Left	*							
Thru	*							
Right	*							
Peds	*							
NB Right								
SB Right								
Green	63P				27P			
Yellow/A-R	5				5			
Lost Time	3.0				3.0			

Cycle Length: 100 secs Phase combination order: #1 #5

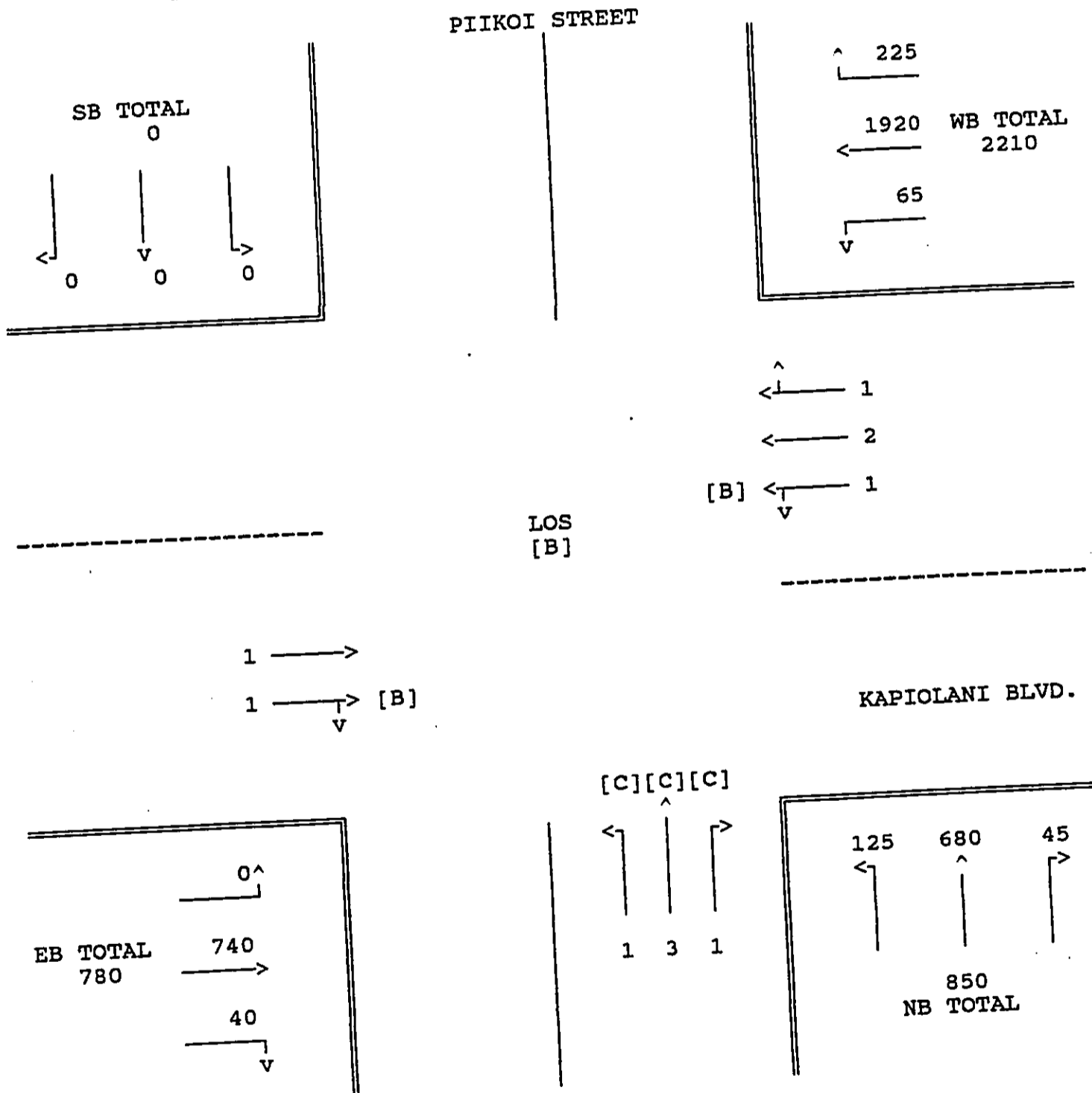
Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
Mvmts	Cap	Flow	Ratio	Ratio			Delay	LOS	
EB	TR	3290	2138	0.40	6.4	B	6.4	B	
WB	LTR	5954	3870	0.66	8.5	B	8.5	B	
NB	L	1409	409	0.32	21.3	C	22.7	C	
	T	4972	1442	0.55	23.1	C			
	R	1515	439	0.11	19.8	C			

Intersection Delay = 11.2 (sec/veh) Intersection LOS = B

INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PIIKOI STREET
Time period:



HCM: SIGNALIZED INTERSECTION SUMMARY

Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD.

(N-S) PENSACOLA ST

Analyst: VIJAY SINHA

File Name: PMEX.HC9

Area Type: Other

4-3-92 PM

Comment: EXISTING CONDITIONS

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes		4	<		2					1	2	1
Volumes		2150	265		1000					275	745	210
Lane Width		10.0			11.0					14.0	10.0	14.0
RTOR Vols			0			0						30

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds			
WB Left					SB Left	*		
Thru	*				Thru	*		
Right					Right	*		
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	65P				Green	25P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

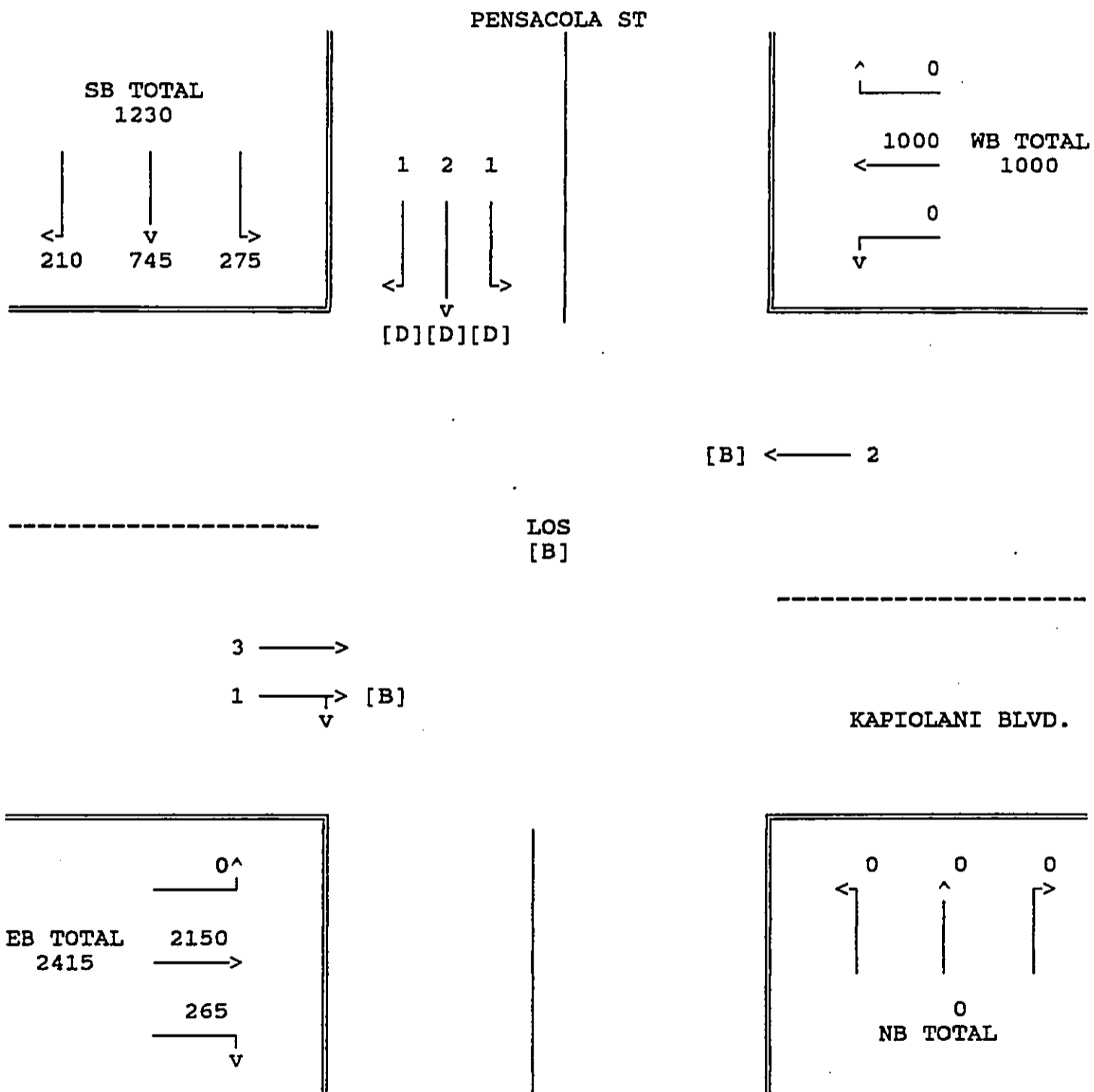
	Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
	Mvmts	Cap	Flow	Ratio	Ratio					
EB	TR	6437	4313	0.65	0.67	7.6	B		7.6	B
WB	T	3374	2261	0.49	0.67	6.3	B		6.3	B
SB	L	1439	389	0.74	0.27	30.5	D		34.0	D
	T	3315	895	0.92	0.27	37.3	D			
	R	1297	350	0.54	0.27	25.0	D			

Intersection Delay = 13.9 (sec/veh)

Intersection LOS = B

INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PENSACOLA ST
 Time period:



HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PIIKOI STREET
 Analyst: VIJAY SINHA File Name: KOIPMEX.HC9
 Area Type: Other 4-3-92 PM
 Comment: EXISTING CONDITIONS

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	>	4	<	2	<		1	3	1			
Volumes	130	2230	65	735	175		265	1385	200			
Lane Width		10.0		10.0			10.0	10.0	12.0			
RTOR Vols			0		0				0			

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left	*				NB Left	*		
EB Thru	*				NB Thru	*		
EB Right	*				NB Right	*		
EB Peds	*				NB Peds	*		
WB Left					SB Left			
WB Thru	*				SB Thru			
WB Right	*				SB Right			
WB Peds	*				SB Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	55P				Green	35P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

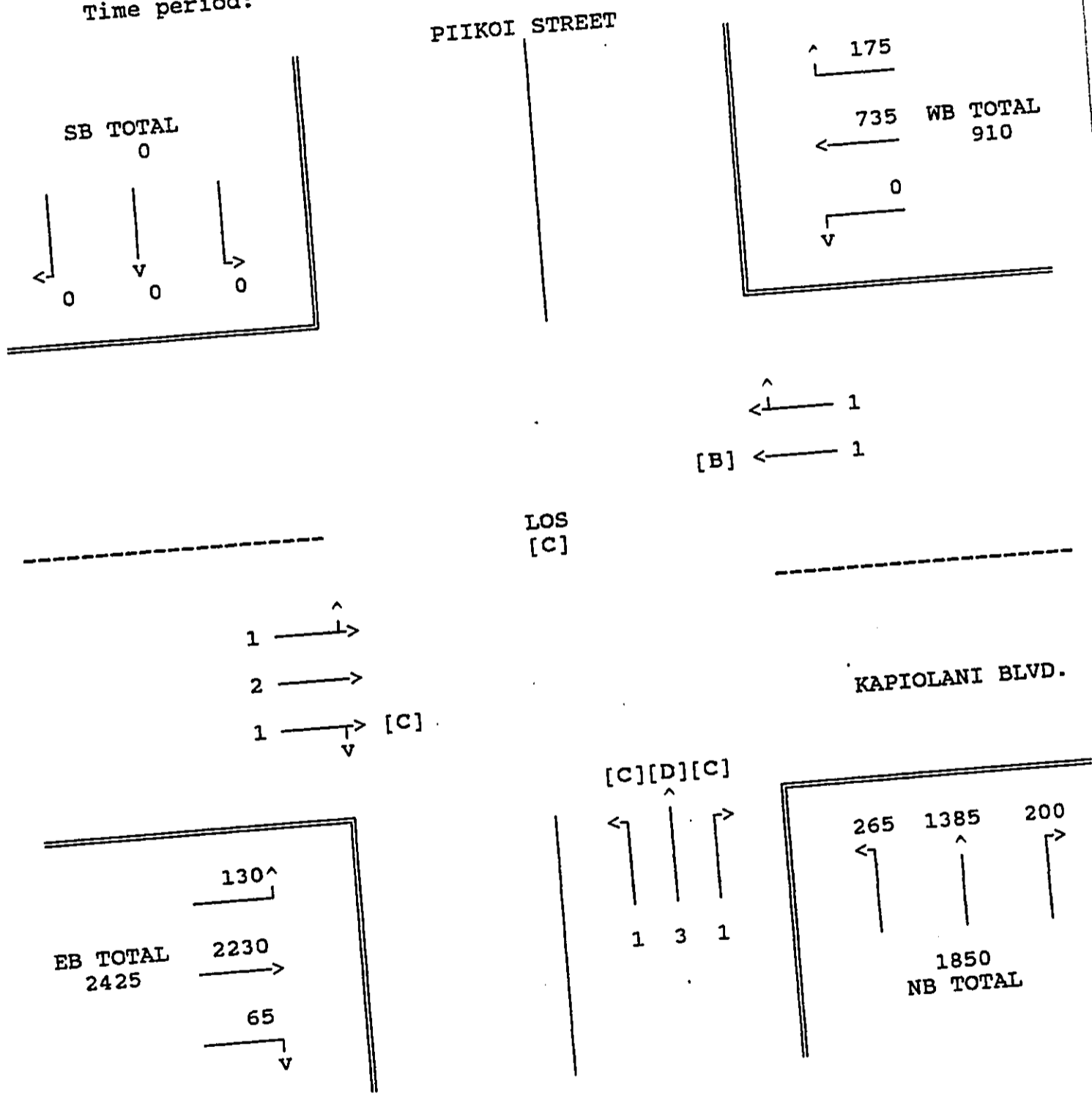
Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

	Lane Mvmts	Group: Cap	Adj Sat Flow	v/c Ratio	g/c Ratio	Delay	LOS	Approach:	
								Delay	LOS
EB	LTR	5486	3127	0.90	0.57	17.2	C	17.2	C
WB	TR	3220	1835	0.55	0.57	10.5	B	10.5	B
NB	L	1409	521	0.54	0.37	19.7	C	24.2	C
	T	4972	1840	0.87	0.37	25.8	D		
	R	1515	561	0.38	0.37	17.7	C		
Intersection Delay = 18.5 (sec/veh)						Intersection LOS = C			

INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PIIKOI STREET
Time period:



HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST
 Analyst: VIJAY SINHA File Name: COLAMOUT.HC9
 Area Type: Other 4-3-92 AM
 Comment: CUMULATIVE WITHOUT PROJECT CONDITION

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	2	<			>	4				1	2	1
Volumes	587		170	51	2092					226	667	300
Lane Width	10.0				11.0					14.0	10.0	14.0
RTOR Vols			0			0						30

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds			
WB Left	*				SB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	65P				Green	25P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
Mvmts	Cap	Flow	Ratio	Ratio					
EB	TR	3124	2093	0.40	0.67	5.7	B	5.7	B
WB	LT	6342	4249	0.58	0.67	7.0	B	7.0	B
SB	L	1439	389	0.61	0.27	26.3	D	30.7	D
	T	3315	895	0.82	0.27	30.5	D		
	R	1297	350	0.81	0.27	35.1	D		

Intersection Delay = 13.3 (sec/veh) Intersection LOS = B

HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PIKOI STREET
 Analyst: VIJAY SINEA File Name: KOIAMOUT.HC9
 Area Type: Other 4-3-92 AM
 Comment: CUMULATIVE WITHOUT PROJECT CONDITION

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	2	<		>	4	<	1	3	1			
Volunes	771		42	68	1998	244	145	804	53			
Lane Width	10.0			10.0			10.0	10.0	12.0			
RTOR Vols			0			0			0			

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
WB Left	*				SB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	63P				Green	27P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
	Mvmts	Cap	Flow	Ratio	Ratio				
EB	TR	3290	2138	0.42	0.65	6.5	B	6.5	B
WB	LTR	5882	3823	0.70	0.65	8.9	B	8.9	B
NB	L	1409	409	0.37	0.29	21.8	C	23.7	C
	T	4972	1442	0.65	0.29	24.3	C		
	R	1515	439	0.13	0.29	19.9	C		

Intersection Delay = 12.1 (sec/veh) Intersection LOS = B

HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST
 Analyst: VIJAY SINHA File Name: COLPMOUT.HC9
 Area Type: Other 4-3-92 PM
 Comment: CUMULATIVE WITHOUT PROJECT CONDITION

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes		4	<		2					1	2	1
Volumes		2236	330		1054					234	897	304
Lane Width		10.0			11.0					14.0	10.0	14.0
RTOR Vols			0			0						30

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds			
WB Left					SB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	65P				Green	25P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:		
							Delay	LOS	
Mvnts	Cap	Flow	Ratio	Ratio					
EB	TR	6414	4297	0.69	0.67	8.1	B	8.1	B
WB	T	3374	2261	0.51	0.67	6.5	B	6.5	B
SB	L	1439	389	0.63	0.27	26.8	D	69.0	F
	T	3315	895	1.11	0.27	89.1	F		
	R	1297	350	0.82	0.27	36.0	D		

Intersection Delay = 24.2 (sec/veh) Intersection LOS = C

HCM: SIGNALIZED INTERSECTION SUMMARY

Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PIIKOI STREET
 Analyst: VIJAY SINHA File Name: KOIPWOUT.HC9
 Area Type: Other 4-3-92 PM
 Comment: CUMULATIVE WITHOUT PROJECT CONDITION

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	>	4	<	2	<		1	3	1			
Volumes	141	2333	67	764	192		290	1522	222			
Lane Width		10.0		10.0			10.0	10.0	12.0			
RTOR Vols			0		0				0			

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left	*				NB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
WB Left					SB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	55P				Green	35P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:		
							Delay	LOS	
Mvmts	Cap	Flow	Ratio	Ratio					
EB	LTR	5402	3079	0.96	0.57	21.6	C	21.6	C
WB	TR	3215	1833	0.58	0.57	10.8	B	10.8	B
NB	L	1409	521	0.59	0.37	20.5	C	29.5	D
	T	4972	1840	0.96	0.37	32.6	D		
	R	1515	561	0.42	0.37	18.1	C		
Intersection Delay = 22.7 (sec/veh)						Intersection LOS = C			

HCM: SIGNALIZED INTERSECTION SUMMARY
Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD.
Analyst: VIJAY SINHA
Area Type: Other
Comment: CUMULATIVE WITH PROJECT CONDITION

(N-S) PENSACOLA ST
File Name: COLAMWIT.HC9
4-3-92 AM

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	2	<		>	4					1	2	1
Volumes	585		170	50	2090					250	705	340
Lane Width	10.0				11.0					14.0	10.0	14.0
RTOR Vols			0			0						30

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left	*							
Thru	*							
Right	*							
Peds	*							
WB Left	*							
Thru	*							
Right	*							
Peds	*							
NB Right								
SB Right								
Green		65P						
Yellow/A-R		5						
Lost Time		3.0						

NB Left
Thru
Right
Peds
SB Left *
Thru *
Right *
Peds *
EB Right
WB Right
Green 25P
Yellow/A-R 5
Lost Time 3.0

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
Mvmts	Cap	Flow	Ratio	Ratio					
EB	TR	3118	2089	0.40	0.67	5.7	B	5.7	B
WB	LT	6351	4255	0.58	0.67	6.9	B	6.9	B
SB	L	1439	389	0.68	0.27	28.0	D	36.0	D
	T	3315	895	0.87	0.27	33.1	D		
	R	1297	350	0.93	0.27	49.3	E		

Intersection Delay = 15.2 (sec/veh) Intersection LOS = C

HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD.
 Analyst: VIJAY SINHA
 Area Type: Other
 Comment: CUMULATIVE WITH PROJECT CONDITION

(N-S) PIIKOI STREET
 File Name: KOIAMWIT.HC9
 4-3-92 AM

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	2	<		>	4	<	1	3	1			
Volumes	795		40	70	1995	240	145	820	55			
Lane Width	10.0				10.0		10.0	10.0	12.0			
RTOR Vols			0			0			0			

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
WB Left	*				SB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	63P				Green	27P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:	Delay	LOS
Mvmts	Cap	Flow	Ratio	Ratio					
EB	TR	3290	2138	0.43	0.65	6.6	B	6.6	B
WB	LTR	5839	3795	0.70	0.65	9.0	B	9.0	B
NB	L	1409	409	0.37	0.29	21.8	C	23.9	C
	T	4972	1442	0.66	0.29	24.5	C		
	R	1515	439	0.13	0.29	19.9	C		

Intersection Delay = 12.2 (sec/veh) Intersection LOS = B

HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST
 Analyst: VIJAY SINHA File Name: COLPMWIT.HC9
 Area Type: Other 4-3-92 PM
 Comment: CUMULATIVE WITH PROJECT CONDITION

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes		4	<		2					1	2	1
Volumes		2240	330		1055					325	905	250
Lane Width		10.0			11.0					14.0	10.0	14.0
RTOR Vols			0			0						30

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left					NB Left			
Thru	*				Thru			
Right	*				Right			
Peds	*				Peds			
WB Left					SB Left	*		
Thru	*				Thru	*		
Right	*				Right	*		
Peds	*				Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	65P				Green	25P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

Lane	Group:	Adj Sat	v/c	g/c	Delay	LOS	Approach:		
							Delay	LOS	
Mvmts	Cap	Flow	Ratio	Ratio					
EB	TR	6414	4297	0.69	0.67	8.1	B	8.1	B
WB	T	3374	2261	0.52	0.67	6.5	B	6.5	B
SB	L	1439	389	0.88	0.27	40.7	E	73.0	F
	T	3315	895	1.12	0.27	94.5	F		
	R	1297	350	0.66	0.27	27.8	D		

Intersection Delay = 25.6 (sec/veh) Intersection LOS = D

HCM: SIGNALIZED INTERSECTION SUMMARY
 Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PIIKOI STREET
 Analyst: VIJAY SINHA File Name: KOIPMWIT.HC9
 Area Type: Other 4-3-92 PM
 Comment: CUMULATIVE WITH PROJECT CONDITION

	Eastbound			Westbound			Northbound			Southbound		
	L	T	R	L	T	R	L	T	R	L	T	R
No. Lanes	>	4	<	2	<		1	3	1			
Volumes	150	2350	65	765	205		290	1540	220			
Lane Width		10.0		10.0			10.0	10.0	12.0			
RTOR Vols			0		0				0			

Signal Operations

Phase combination	1	2	3	4	5	6	7	8
EB Left	*				NB Left	*		
EB Thru	*				NB Thru	*		
EB Right	*				NB Right	*		
EB Peds	*				NB Peds	*		
WB Left					SB Left			
WB Thru	*				SB Thru			
WB Right	*				SB Right			
WB Peds	*				SB Peds	*		
NB Right					EB Right			
SB Right					WB Right			
Green	55P				Green	35P		
Yellow/A-R	5				Yellow/A-R	5		
Lost Time	3.0				Lost Time	3.0		

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

	Lane Mvmts	Group: Cap	Adj Sat Flow	v/c Ratio	g/c Ratio	Delay	LOS	Approach:	
								Delay	LOS
EB	LTR	5365	3058	0.97	0.57	23.6	C	23.6	C
WB	TR	3210	1830	0.59	0.57	10.9	B	10.9	B
NB	L	1409	521	0.59	0.37	20.5	C	30.8	D
	T	4972	1840	0.97	0.37	34.2	D		
	R	1515	561	0.41	0.37	18.1	C		
Intersection Delay =						24.1 (sec/veh)	Intersection LOS = C		

APPENDIX D

ACOUSTIC/VIBRATION STUDY

Y. Ebisu & Associates

Acoustical and Electronic Engineers

1126 12th Avenue
Room 305
Honolulu, Hawaii 96816
(808) 735-1634

YEA #30-023
August 6, 1992

Anbe, Aruga & Ishizu Architects, Inc.
1451 South King Street, Suite 504
Honolulu, Hawaii 96814

Attention: Mr. Mits Aruga

Subject: Pile Driving Noise and Vibration During Construction;
Hale Kewalo Project

Dear Mr. Aruga:

The following letter report describes my predictions and evaluations regarding potential pile driving noise and vibration impacts on McKinley High School classrooms and buildings. FIGURE 1 depicts the relationship of the Hale Kewalo Project Site to the McKinley High School Campus. Some of the newer classroom buildings are not included in FIGURE 1. Pre-drilling may reduce the number of blows required to drive a pile to refusal, but is not expected to significantly reduce the noise levels of the pile driver, particularly at refusal.

Pile Driving Noise. Typical maximum (or Lmax) noise levels of impact pile drivers are expected to range between 98 dB at 100 FT distance to 78 dB at 1,000 FT distance. Typical median (L50, or noise level exceeded 50 percent of the time) noise levels during impact pile driving activities are expected to range between 93 dB at 100 FT distance to 71 dB at 1,000 FT distance. Indoors, typical levels of pile driving noise within naturally ventilated and air conditioned structures are approximately 10 and 22 dB less, respectively, than the outdoor levels listed above.

Mitigation of impact pile driving noise to inaudible levels will not be practical due to the intensity of the noise sources (98 dB at 100 FT distance), and due to the exterior nature of the work. The incorporation of State Department of Health construction noise limits and curfew times, which are applicable on the island of Oahu ("Title 11, Administrative Rules, Chapter 43, Community Noise Control for Oahu;" Hawaii State Department of Health; November 6, 1981), are standard noise mitigation measures which are normally applied to pile driving activities. TABLE 1 depicts the allowed hours of construction for normal construction noise (levels which do not exceed 95 dB at a project's property line) and for construction noise which exceeds 95 dB at the project's property line. Pile driving activities generally fall within the

second category whose noise levels exceed 95 dB at the property line. Noisy construction activities are not allowed on holidays, Saturdays, Sundays, during the early morning, and during the late evening periods under the DOH permit procedures.

Recommended classroom noise abatement criteria for use during construction (see "Construction Noise Level Study for Buildings 'A' and 'B', Princess Nahienaena Elementary School;" D.A.G.S. Job No. 15-16-3300; June 1990) were applied in this current study. The noise predictions indicated that interior classroom noise levels will probably exceed the current DOE noise abatement criteria of "L50 > 55 dBA" for general classroom situations, and could also exceed the "L50 > 62 dBA" construction noise criteria during impact pile driving activities at the Hale Kewalo project. Exceedances of the "L50 > 62 dBA" criteria during pile driving activities are predicted to occur in naturally ventilated classrooms which are located within 1,000 FT distance of the driven pile. Exceedances of the "L50 > 62 dBA" criteria during pile driving activities are predicted to occur in air conditioned classrooms which are located within 250 FT distance of the driven pile.

Vibration from Pile Driving. Induced ground vibrations from impact pile driving operations have the potential to cause architectural and structural damage to structures, and to create discomfort to those exposed to high levels of vibration.

Ground vibrations generated during pile driving operations are generally described in terms of peak particle (or ground) velocity in units of inches/second. The human being is very sensitive to ground vibrations, which are perceptible at relatively low particle velocities of 0.01 to 0.04 inches/second. Damage to structures, however, occur at even higher levels of vibration as indicated in TABLE 2. The most commonly used damage criteria for structures is the 2.0 inches/second limit derived from work by the U.S. Bureau of Mines. A more conservative limit of 0.2 inches per second is also used, and is suggested for planning purposes on this project because of the repetitive nature of pile driving operations which can increase risks of damage due to fatiguing, plus the historic nature and age of some of the school buildings.

Based on measured vibration levels during pile driving operations under various soil conditions and at various distances, estimates of ground vibration levels vs. distance from the pile driver have been made for various soil conditions and for various energy ratings of the pile drivers. FIGURE 2, which was extracted from "Damage Effects of Pile Driving Vibration;" Highway Research Record, Number 155, may be used to predict vibration levels for the soil conditions indicated. When coral layers must be penetrated, vibration levels can be expected to be higher than

those shown in FIGURE 2, particularly if the adjacent structures are supported by the common coral layer. Pre-drilling should eliminate this concern. From FIGURE 2, and for wet sand soil conditions, the 0.2 inches/second vibration damage criteria will be exceeded at a scaled energy distance factor of approximately 0.7. The scaled energy distance factor is equal to the square root of the energy (in foot-pounds) per blow of the hammer divided by the distance (in feet) between the pile tip and the monitoring location. For a 30,000 foot-pound pile driver, a scaled energy distance of 0.7 equates to a separation distance of 247 FT. Under clay soil conditions, and using the prediction procedures contained in FIGURE 2, a shorter separation distance of 115 FT is required to not exceed the 0.2 inches/second criteria when using a 30,000 foot-pound pile driver. It should be noted that 0.2 inches per second vibration levels were measured from a 22,400 foot-pound pile driver at even shorter separation distances of approximately 30 FT in sandy, layered soil ("Some Aspects of the Ground Vibration Problem;" Noise Control Engineering; May-June 1978). The measurement data reported from the 22,400 foot-pound pile driver were significantly lower than the vibration levels predicted by the methodology of FIGURE 2.

As indicated above, predictions of peak ground vibration levels vs. scaled energy distance factor from the driven pile are not precise, with initial uncertainty factor for a given location in the order of 10:1. For this reason, it is standard practice to employ seismograph monitoring of ground vibrations during pile driving operations with a 3-axis geophone or accelerometer. If pile drivers of approximately 30,000 foot-pounds or larger ratings are anticipated to be used on the job site, the initial vibration predictions indicate that there is some risk of exceeding the 0.2 inches/second vibration damage criteria at 100 to 250 FT separation distances, and monitoring during pile driving operations is warranted. Monitoring alone, however, may not be a practical mitigation measure unless there are alternative pile driving methods or foundation plans which can be employed if the damage criteria is exceeded. For these reasons, the following preventative measures are recommended for implementation during the planning and design phases of the project:

- o In addition to the normal planning and design concerns regarding potential damage due to settling and heaving during construction, consideration should also be given to risks of damage due to vibration from pile driving. A damage criteria of 0.2 inches/second should be used in conjunction with the vibration prediction method of FIGURE 2 to identify the potential damage risk distances to the driven piles for old structures.

- o Predicted vibration levels at and beyond (mauka of) the McKinley High School Administration/Auditorium Building are less than 0.2 inches per second for a 30,000 foot-pound pile driver. Therefore, risks of structural damage to these older buildings of historical significance on the campus are considered to be very low. Vibration levels from pile driving could exceed 0.2 inches/second at the existing Custodian's Cottage, and predicted levels may not be reduced to less than 0.2 inches/second by sizing of the pile driver or through the use of alternate types of piles (bored or non-displacement types). If such is the case, test piles should be driven and its vibrations monitored and recorded at the cottage prior to completion of the foundation design. The monitoring of the test piles should be designed to measure the expected peak, 3-axis vibration levels at the historic buildings. The results of the monitoring should be used to define the empirical distances from the driven pile to the 0.2 and 2.0 inches per second damage risk locations, and to evaluate the risks of structural damage to the adjacent structures during actual construction.
- o If predicted vibration levels from pile driving exceed 2.0 inches/second at an adjacent building, such as the Custodian's Cottage, the use of alternate types of piles should be considered for implementation during the design phase. It is expected that the critical distances to the driven piles will be very small (25 FT or less for 30,000 foot-pound pile driver) at 2.0 inches/second.

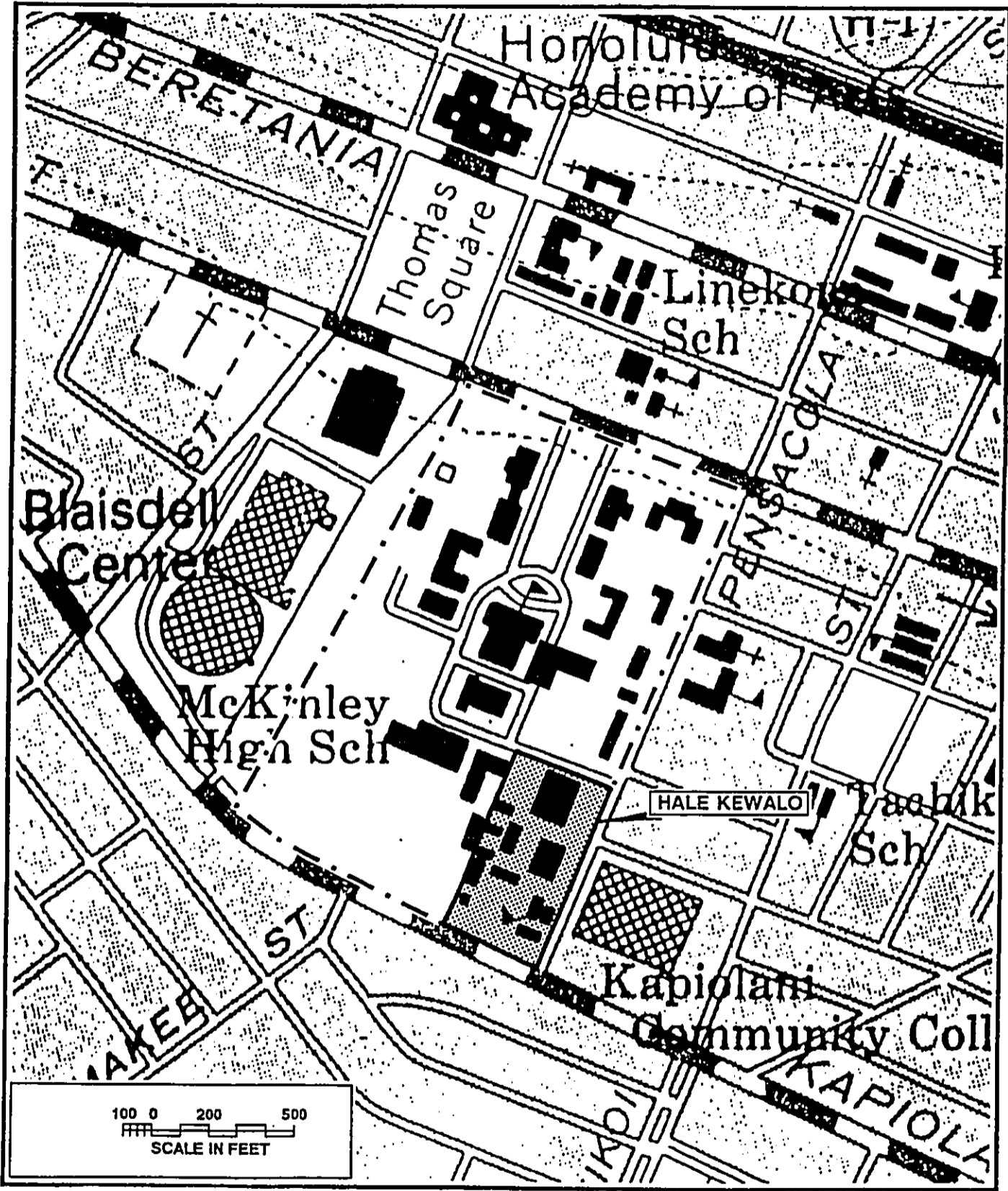
To summarize, the airborne noise impacts from the pile driving activities are expected to be difficult to mitigate due to the large (1,000 FT radius) impact area for naturally ventilated classrooms. The McKinley High School classrooms which are located makai of the circular grass lawn fronting the Administration/Auditorium Building, as well as the Auditorium and Cafeteria Buildings are expected to be in the impact area. The Custodian's Cottage, P/E and Shop buildings are within the zone of greatest noise impact. Risk of structural damage to the older and more historic buildings on campus are expected to be low due to their relatively large separation distance from the project site.

Sincerely,



Yuchi Ebisu, P.E.

encl.

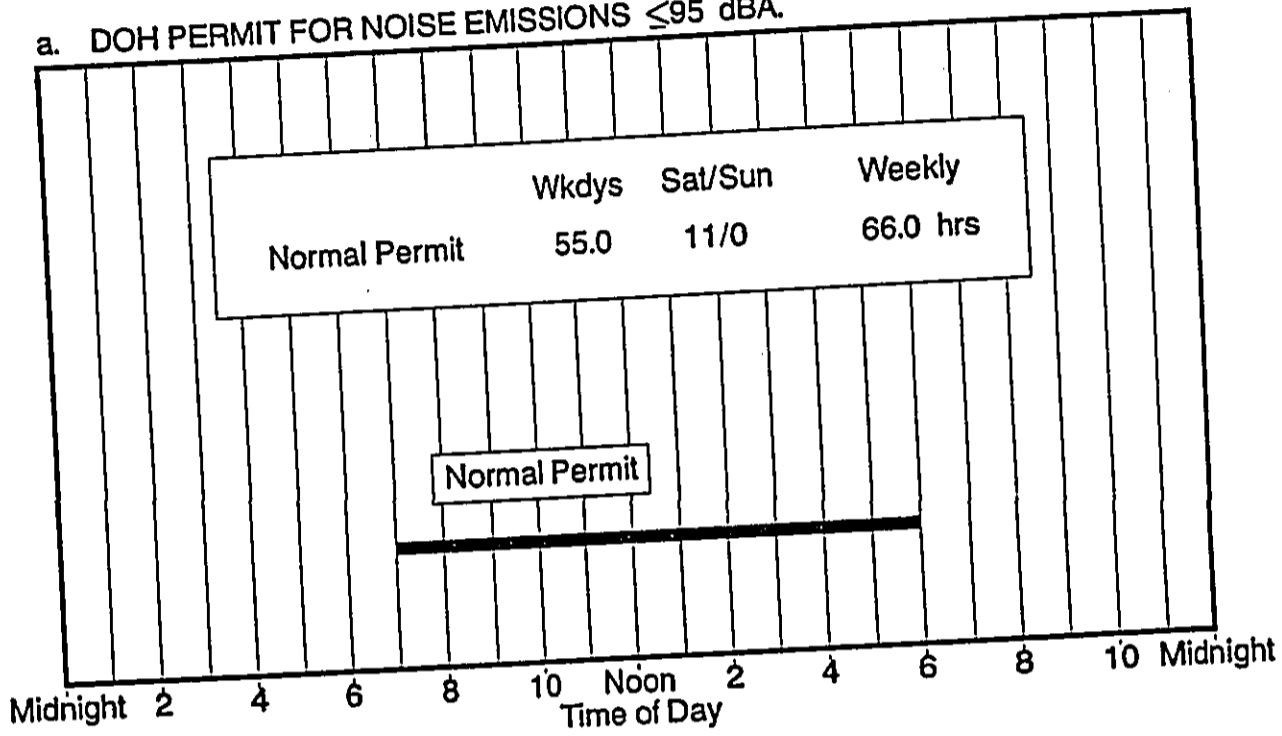


RELATIONSHIP OF HALE KEWALO PROJECT SITE TO MCKINLEY HIGH SCHOOL CAMPUS

FIGURE 1

TABLE 1
AVAILABLE WORK HOURS UNDER DOH
PERMIT PROCEDURES FOR CONSTRUCTION NOISE.

a. DOH PERMIT FOR NOISE EMISSIONS ≤ 95 dBA.



b. DOH PERMIT FOR NOISE EMISSIONS > 95 dBA.

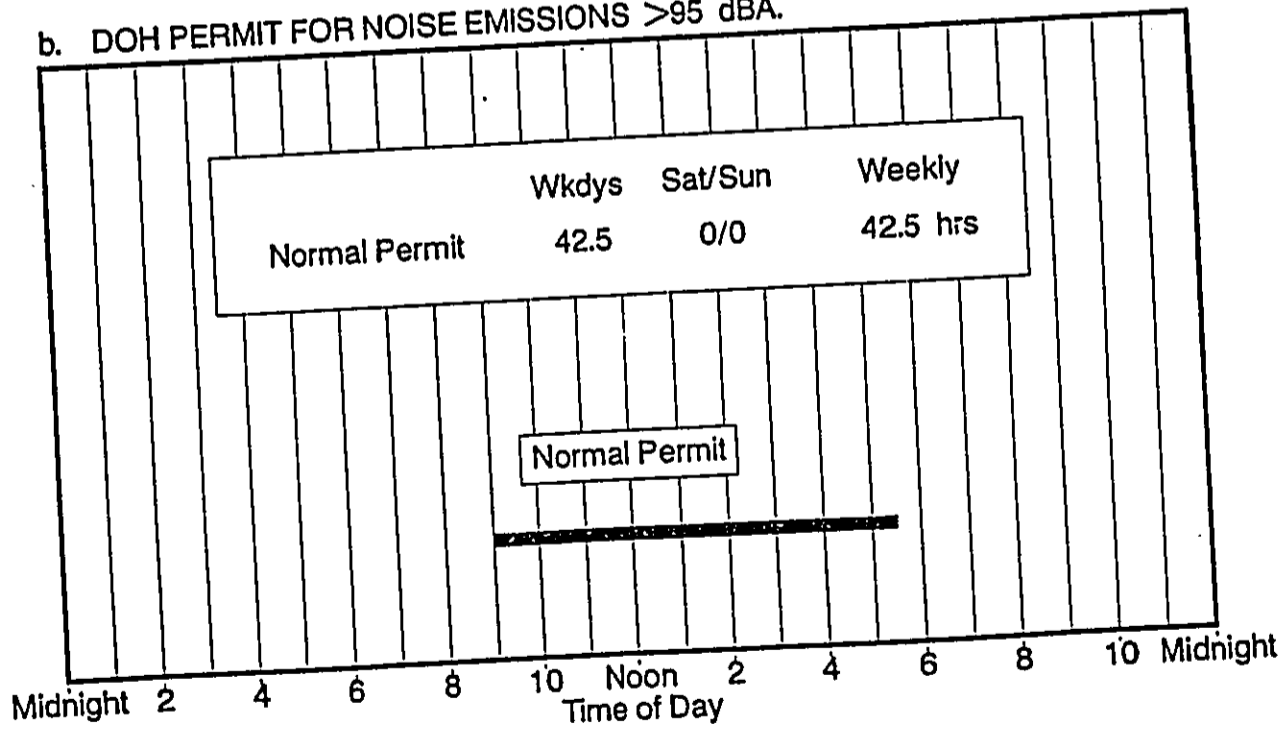
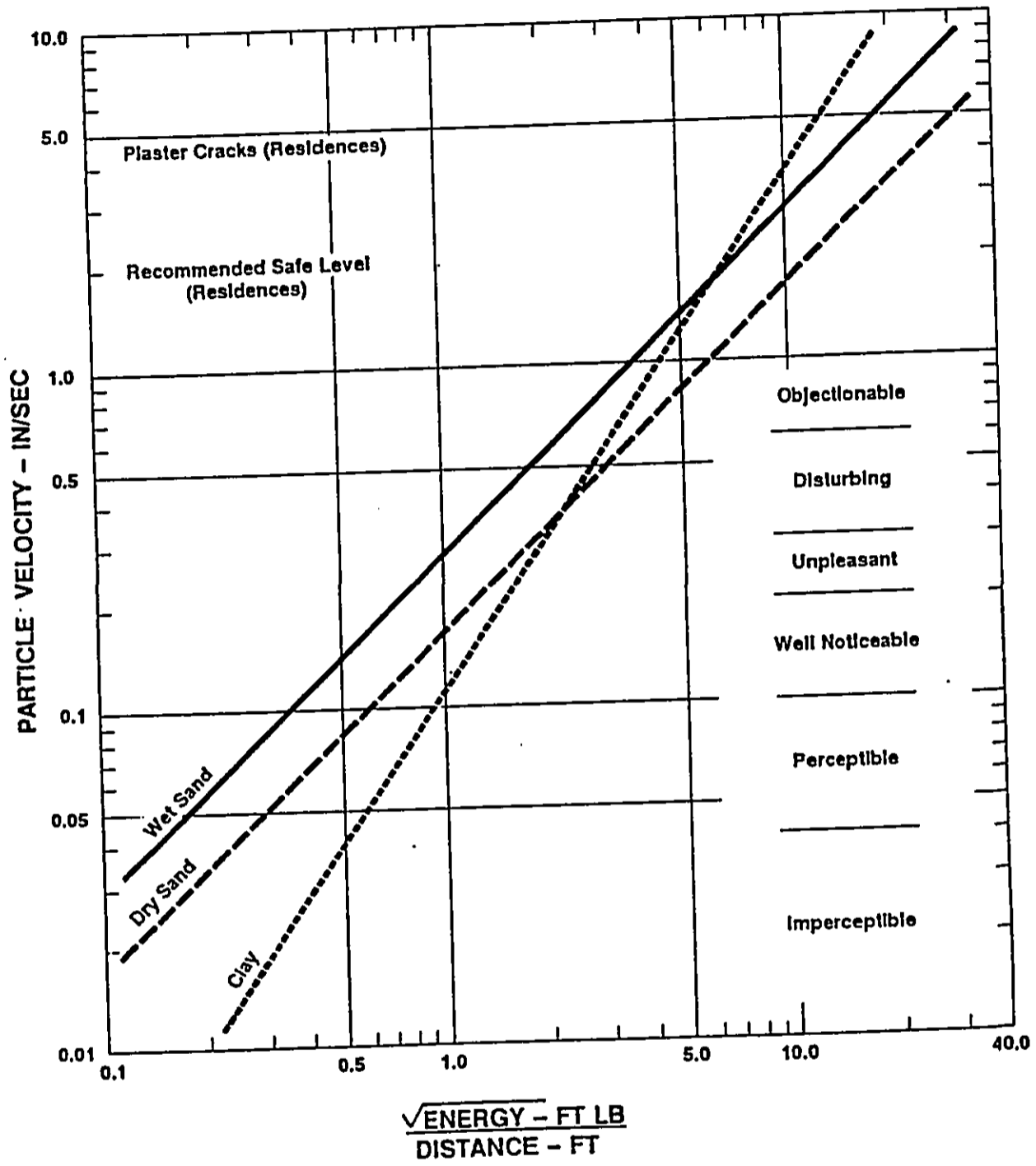


TABLE 2
SUMMARY OF BUILDING DAMAGE CRITERIA

PEAK GROUND VELOCITY (mm/sec)	PEAK GROUND VELOCITY (in/sec)	COMMENT
193.04	7.6	Major damage to buildings (mean of data).
137.72	5.4	Minor damage to buildings (mean of data).
101.16	4.0	'Engineer structures' safe from damage.
50.8	2.0	Safe from damage limit (probability of damage <5%). No structural damage.
33.02	1.3	Threshold of risk of 'architectural' damage for houses.
25.4	1.0	No data showing damage to structures for vibration <1 in./sec.
15.24	0.6	No risk of 'architectural' damage to normal buildings.
10.16	0.4	Threshold of damage in older homes.
5.08	0.2	Statistically significant percentage of structures may experience minor damage (including earthquake, nuclear event, and blast data for old and new structures). No 'architectural' damage.
3.81	0.5 to 0.15	Upper limits for ruins and ancient monuments.
1.0	0.04	Vertical vibration clearly perceptible to humans.
0.32	0.01	Vertical vibration just perceptible to humans.

Source: 'State-of-the-Art Review: Prediction and Control of Groundborne Noise and Vibration from Rail Transit Trains'; U.S. Department of Transportation; December 1983.

VIBRATION INTENSITY VERSUS SCALED ENERGY



MAXIMUM VIBRATION INTENSITIES EXPECTED FROM PILE DRIVING

FIGURE 2

 **DAMES & MOORE**

1144 10TH AVENUE, SUITE 200, HONOLULU, HAWAII 96816-2497
(808) 735-3585 FAX: (808) 732-6077

August 28, 1992
16274-012-011

Walter Leong & Associates
600 Kapiolani Boulevard, Suite 210
Honolulu, Hawaii 96813

Fax: (808) 531-7057

Attention: Mr. Curtis Miyamura

Subject: Pile Driving Noise and Vibration
Hale Kewalo Project
Honolulu, Oahu, Hawaii

Gentlemen:

We have reviewed the letter report prepared by Y. Ebisu & Associates projecting noise and vibration impacts on McKinley High School classrooms and buildings due to pile driving. We concur with their findings in general. Our comments are directed to the projections on ground vibrations.

The Y. Ebisu report indicates that ground vibrations of up to 0.2 inch per second (ips) may occur at distances of up to about 250 feet, assuming wet sand soils and a 30,000 foot-pound impact pile hammer. On the basis of other projects we have conducted in the immediate site area, we believe that the 0.2 ips threshold recommended by Y. Ebisu will likely equate to a distance much closer to 100 feet.

Our usual approach to evaluating potential damage impacts to nearby structures utilizes a system of threshold values based on type of construction and age and condition of structures. Following Chae (1978), thresholds are established as follows:

Class I	Structures of substantial construction	4.0 ips
Class II	Relatively new residential structures in sound condition	2.0 ips
Class III	Relatively old residential structures in poor condition	1.0 ips
Class IV	Old residential structures in very poor condition	0.5 ips

(MO:16274-012)

 **DAMES & MOORE**

Walter Leong & Associates, Inc.
August 28, 1992
Page 2

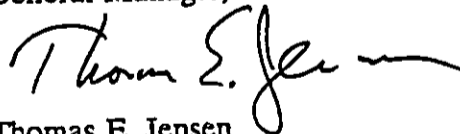
Judgment must be applied to classification of structures into the above classes. For older structures of non-residential type are not clearly classified. As with the recommended approach given by Y. Ebisu, the repetitive nature of pile driving vibrations can justify modification of the threshold values. Thus, we suggest a down-grading of one class for structures subjected to piling vibrations. We would apply a Class III or IV threshold for structures in the area of the proposed piling. The more conservative Class IV threshold, 0.5 ips, is somewhat higher than the 0.2 ips threshold. If the 0.5 ips limit is applied, then adverse piling vibrations may not be encountered for distances greater than about 70 to 80 feet.

Predictions such as those made by Dames & Moore or by Y. Ebisu are somewhat judgmental, for site specific conditions will control the transfer of energy from the pile hammer to the ground and the rate at which vibration levels are attenuated by distance. Where concern for adjacent structures exists, we often use vibration recording instrumentation to record actual site specific vibration levels during the driving of test piles. This allows for interruption of driving if adverse levels are observed and can be used to help modify the driving program, if needed. Vibration monitoring during production pile driving can be instituted if the test pile results indicate that such monitoring is advisable.

Very truly yours,
DAMES & MOORE, INC.



S.K. Djou, P.E.
General Manager, Mid-Pacific



Thomas E. Jensen
Senior Geophysicist

SKD/TEJ
(2 copies submitted)

cc: Department of Business & Economic Development
Hawaii Housing Community Development Authority
State of Hawaii
Attention: Mr. Harold Edwards

APPENDIX E

SOCIAL IMPACT STUDY

Hale Kewalo

Social Impact Assessment

Prepared by Earthplan

for Wilson Okamoto and Associates, Inc.

March 1993

Table of Contents

- 1. Introduction and Background 1**
 - 1.1 Report Description and Preparation, 1
 - 1.2 Report Contents, 1
 - 1.3 Description of the Proposed Project, 2

- 2. Profile of the Existing Community 5**
 - 2.1 Definition of the Study Area 5
 - 2.2 Demographics, 7
 - 2.3 Family Characteristics, 12
 - 2.4 Housing and Households, 13
 - 2.5 Summary of Study Area Characteristics, 16

- 3. Major Forces for Change Without Hale Kewalo, 18**
 - 3.1 Major Policies Guiding the Study Area, 18
 - 3.1.1 The Kakaako Community Development District Mauka Area Plan, 18
 - 3.1.2 City Development Plans, 22
 - 3.1.3 Other Policies, 22
 - 3.2 Major Development Proposals Near the Project Site, 23
 - 3.3 Possible Future Scenario Without the Hale Kewalo Project, 27

- 4. Potential Social Impacts of Hale Kewalo, 31,**
 - 4.1 Residential Population Growth and Demographics, 31
 - 4.2 Impact on Supply of Affordable Housing, 33
 - 4.2.1 Impact on the Supply of Affordable Housing, 33
 - 4.2.2 Impact on the Supply of Faculty Housing, 34
 - 4.3 Change in Character of the Neighborhood, 36
 - 4.3.1 Description of the Existing Neighborhood, 37
 - 4.3.2 Likely Neighborhood Changes Without the Proposed Project, 39
 - 4.3.3 Project's Effect on Neighborhood Character, 39
 - 4.4 Impacts on Adjacent Uses, 42
 - 4.4.1 Resident Complaints, 42
 - 4.4.2 Parking, 44
 - 4.4.3 Construction Activities, 44
 - 4.4.4 Expansion of School Facilities, 45

Hale Kewalo Social Impact Assessment

Prepared by Earthplan

4.5 Impacts on Public Services and Facilities, 47

4.5.1 Police Protection, 47

4.5.2 Fire Protection, 48

4.5.3 Schools, 48

4.5.4 Parks and Recreation, 50

5. Preliminary Community Issues, 52

5.1 Sources of Information, 52

5.2 Overview of Project-Related Issues, 53

5.2.1 Summary of Community Issues on Hale Kewalo, 53

5.2.2 Positions, 54

5.3 Analysis of Major Issues Related to Hale Kewalo, 58

5.3.1 Competition between to Proposed Project and Educational Needs, 58

5.3.2 School - Resident Compatibility, 61

5.3.3 Construction Impacts, 61

5.3.4 Historic and Visual Impacts, 62

5.3.5 Appropriateness of Faculty Housing Component, 63

5.3.6 Impact on Non-Educational Public Facilities and Services, 64

References for Hale Kewalo Social Impact Assessment, 65

Appendix A: List of Correspondence Reviewed for Issues Analysis, 69

List of Tables

1. Rental Information for Hale Kewalo, 4
2. Demographic Characteristics of the Study Area: 1990, 8
3. Place of Birth and Previous Residence: 1990, 9
4. Education and Labor Force: 1990, 11
5. Family Characteristics: 1990, 12
6. Housing Stock and Household Characteristics: 1990, 14
7. Major Planned Development Projects in the Kakaako Community Development District Mauka Area, 24
8. Potential Residential Population Increase Resulting from Major Development Proposals, 28
9. Population Increase Due to Hale Kewalo, 31
10. Historic Enrollment at McKinley High School, 46
11. Enrollment and Capacity Information on Schools Impacted by Hale Kewalo

Section 1. Introduction and Background

1.1 Report Description and Preparation

The State of Hawaii proposes to develop Hale Kewalo in the mauka portion of Kaka'ako. An Environmental Assessment was prepared for the project and a Negative Declaration was issued in October 1992 and subsequently withdrawn.

An Environmental Impact Statement (EIS) is currently being prepared on the proposed action. This report assesses potential social impacts of the project, and is appended to and summarized in the EIS.

This social impact assessment was prepared by Earthplan, whose offices are located at 81 South Hotel Street, Suite 211. Berna Cabacungan, principal of Earthplan, was project manager, and principal investigator and analyst. Assistance was provided by three sub-consultants. Michael P. Mays analyzed project- and non-project related issues, conducted a site analysis, and reviewed projects proposed near the project site. Traver Carroll prepared tables containing census information. Denine Sansom reviewed Neighborhood Board minutes.

1.2 Report Contents

Section 1.3 describes the project and provides background information on income qualifications of potential residents of the proposed on-site affordable units.

Section 2 establishes the social context of the proposed project, and provides information on the existing community. Presented is information regarding population and demographics, housing and households and family characteristics.

In Section 3, the baseline information is extended with a description of major policies and planned projects which are helping to shape the future of the Study Area. This information contributes to the development of a possible future scenario for the Study Area without the Hale Kewalo project.

Section 4 presents potential social impacts of Hale Kewalo. Impacts on residential population and housing supply are discussed, as well as the project's role in the change in the character of the neighborhood. This section also looks at potential impacts on adjacent uses, and on public services and facilities.

Preliminary community issues are discussed in Section 5. This section examines the issues raised by the community on this project, as presented in the news media and project-related correspondence.

1.3 Description of the Proposed Project

The Hawaii Community Development Authority (HCDA), in conjunction with the State Housing Finance and Development Corporation (HFDC) and the University of Hawaii (UH), is jointly proposing to develop approximately 5.3 acres in the mauka portion of Kaka'ako. The region in which the project site is located is mixed use in character. Immediately to the north and west is McKinley High School. Further west is the Blaisdell Center and a residential project under construction. East of the project site are vacated low-rise structures, and northeast are low-rise apartments and single-family homes. South or makai of the project site are primarily industrial, commercial and office uses.¹

The site is roughly rectangular in shape and currently contains low-rise concrete buildings, wooden portable classroom structures and an asphalt parking lot. The Employment Training Office (ETO) of the University of Hawaii currently operates on-site. Located on the mauka or northern portion of the project site, the two story concrete building temporarily housed the main branch of the Hawaii State Library until May of last year. This building, hereby referred to as Building 857, is temporarily housing McKinley High Schools Adult Education activities and houses ten classrooms which are being used as relocation sites for activities displaced during the renovation of Building A at McKinley. The Young Parents Program for McKinley High School students with children is also occupying temporary space in this building.

The State's project objectives for Hale Kewalo include:

- increase the supply of affordable housing for the general population in the urban core;
- increase the supply of affordable housing for new faculty members of the University of Hawaii in a centrally-located site in Honolulu's urban core;
- expand the UH Employment Training Center currently located on-site;

1. Section 4 contains more detailed information about the surrounding community

- provide basic community recreational amenities; and
- allow the continuation of educational activities on-site.

Proposed project components are as follows:

- **Rental housing**

The State proposes to develop 530 affordable rental apartments in two 29-story structures. Affordable housing units for the general public will be provided in a building located on the 'ewa or west portion of the project site, near the existing athletic field of McKinley High School. In a building planned for the central portion of the site, the State proposes rental units to be used as affordable housing units for UH faculty.

- **On-site recreational facilities.**

The project will accommodate the recreational needs of on-site residents in two areas. First, the level above the parking deck will contain 35,988 square feet of recreational space.² Planned for this area are a tot lot, an exercise area, barbeque facilities recreation/meeting rooms, basketball and volleyball courts, and a trellised and grassed area for passive recreation. Second, the project includes 1.75 acres located at the corner of Pensacola Street and Kapiolani Boulevard; this is planned for open space and park use.

- **Employment Training Office (ETO) and Educational Uses.**

A two-story structure adjacent to the faculty housing structure will be used for activities related to the ETO currently operating on-site. This structure will be situated parallel to Pensacola Street. To be preserved, Building 857 will be conveyed to the State Department of Education to be used for educational purposes.

2. Based on 55 square feet per residential unit.

- **Parking**

The project includes 716 parking spaces, of which 83 will be located at grade along the Pensacola Street frontage. These at-grade spaces will be used for ETO and educational purposes; 50 will be allocated to the State Department of Education. The proposed parking structure will contain 633 spaces to be used for the on-site residents.

All of the residential units will be rentals, and will meet the criteria of "affordable units" as determined by the U.S. Department of Housing and Urban Development. Renters will have incomes ranging from a high of 120 percent of the median income and below. At least 60 percent of the units will be for individuals and families with incomes below 80 percent. The remainder will be allocated for individuals and families with incomes between 80 and 120 percent of the median income.

As shown on Table 1, the on-site rents will range from \$600 for a studio to \$1,000 for a two-bedroom unit.

Table 1: Rental Information for Hale Kewalo

Unit Type	Rental Amount	Maximum Rental Subsidy	Minimum Net Rental
Studio	\$600	\$175	\$425
One-Bedroom	\$750	\$175	\$575
Two-Bedroom	\$1,000	\$175	\$825

Source: Provided by HCDA.

Section 2. Profile of the Existing Community

2.1 Definition of the Study Area

The Study Area for this social impact assessment is primarily the area covered by the Ala Moana/Kakaako Neighborhood Board. As depicted in *Figure A*, the Study Area is bounded by King Street on its mauka side and extends to the ocean. From east to west the Study Area extends from Kalakaua Avenue to Keawe Street, Ala Moana Boulevard and South Street. This Study Area includes the Kakaako Community Development District, but extends well beyond the District's mauka and Diamond Head boundaries.

The sub-areas of the Ala Moana/Kakaako Neighborhood Board area generally coincide with census tract designations.³ From east to west, they are as follows:

- **Sub-Area 1**

This sub-area is bounded by Kalakaua Avenue on the Diamond Head side and Ke'eaumoku Street on the 'ewa side. It runs mauka-makai from King Street to Kapi'olani Boulevard; it is coterminous with Census Tract 36.98.

- **Sub-Area 2**

Coterminous with Census Tract 36.97, this sub-area is roughly rectangular in shape. It is bounded by Ke'eaumoku, King and Pensacola Streets and Kapi'olani Boulevard.

- **Sub-Area 3**

The project site is located in this Sub-Area. On the Diamond Head side, this Sub-Area is bounded by Pensacola Street, Kapiolani Boulevard, Kalakaua Avenue and the Ala Wai Canal. Ward Avenue forms the 'ewa boundary. This sub-area is coterminous with Census Tract 37.

³ This report's Study Area does not include a small portion of the Ala Moana/Kakaako Neighborhood Board area. Two blocks bounded by King, Alapai, and Beretania Streets and Ward Avenue are part of Census Tract 35 which encompasses a much larger area. Census information indicates that 200 people resided in this area in 1990. Information comparable to that used in our study was not available at this "Block Group" level.

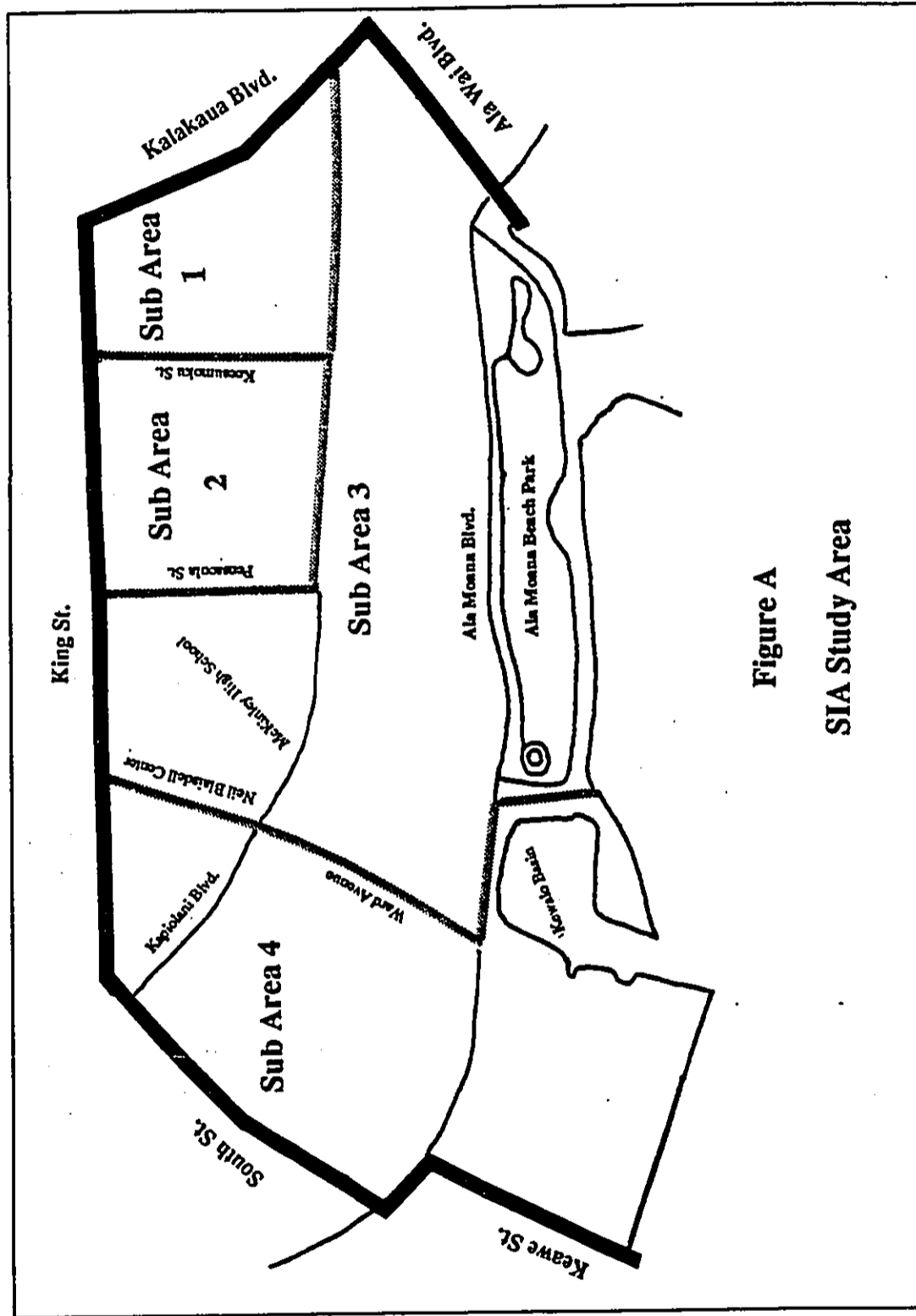


Figure A

SIA Study Area

- **Sub-Area 4**

Sub-Area 4 runs mauka-makai from King Street to the ocean. From east to west, this sub-area extends from the Diamond Head end of Kewalo Basin, Ala Moana Boulevard and Ward Avenue to Keawe Street, Ala Moana Boulevard, and South Street. This sub-area has boundaries similar to Census Tract 38.

2.2 Demographics

In 1990, an estimated 10,657 persons lived in the Study Area, as indicated in Table 2. The most populated area was Sub-Area 1, in which slightly over 48 percent, or 5,151 persons, resided. Most of the remaining population resided in the central portion of the Study Area, which comprised Sub-Areas 2 and 3, and which contained the project site. The primary form of residential structures are low-rise walk-up apartment buildings.

People of Japanese extraction comprised the largest ethnic group in the Study Area; they accounted for almost 33 percent of the population. This is a high proportion when compared to the 23 percent of Japanese residents islandwide. The next largest ethnic group was Caucasian at 29 percent; this is slightly smaller than the islandwide proportion of 32 percent.

The Study Area also had high proportions of Chinese and Korean residents. The latter made up eleven percent of the population, which is a significantly high compared to the O'ahu-wide proportion of three percent. In Sub-Area 3, which contains the project site, the largest ethnic group was Caucasian with over 51 percent.

The Study Area is generally older than the islandwide community. Proportionally, there were fewer people under 18 years of age; only nine percent were in the youth category as compared to 34 percent throughout O'ahu. There were also more people 65 years of age and older. Over 23 percent were in the elderly category, which is two times greater than the islandwide proportion of eleven percent.

Further, all of the Sub-Areas exhibited median ages which correlated to an older population. In 1990, O'ahu residents had a median age of 32.2 years. Sub-Area 3 had the oldest median age at 46.7 years, followed by Sub-Area 1 at 43.7 years.

Table 2: Demographic Characteristics of the Study Area, 1990

	O'ahu	Study Area	Sub-Area 1s	Sub-Area 2	Sub-Area 3	Sub-Area 4
Population	836,231	10,657	5,151	2,474	2,342	690
Ethnicity						
Caucasian	31.6%	29.2%	25.0%	16.0%	51.1%	33.6%
Chinese	7.6%	9.5%	11.1%	11.5%	3.1%	11.9%
Filipino	14.4%	5.0%	4.3%	5.4%	6.7%	3.3%
Japanese	23.3%	32.8%	32.2%	47.5%	17.8%	35.5%
Korean	2.7%	11.2%	16.4%	6.3%	7.1%	3.8%
Hawaiian	11.0%	5.5%	4.5%	8.0%	5.5%	3.6%
Other	9.4%	6.7%	6.4%	5.3%	8.7%	8.3%
Age						
Less than 5	7.4%	3.0%	2.7%	3.4%	3.4%	3.0%
5 to 17 years	17.1%	5.8%	5.1%	9.6%	5.0%	0.7%
18 to 44 years	46.2%	46.4%	42.4%	52.7%	44.1%	62.6%
45 to 64 years	18.3%	21.6%	23.5%	18.1%	22.2%	18.6%
65 or older	11.0%	23.1%	26.4%	16.3%	25.4%	15.1%
Median Age	32.2	n/a	43.7	38.8	46.7	36.7

Sources: U.S. Bureau of the Census, 1992 and 1991.

The Study Area had more residents born in a foreign country than the O'ahu-wide community, as indicated in Table 3. Almost 30 percent of Study Area residents were born abroad, as compared to approximately 16 percent islandwide. There were proportionally fewer Hawai'i-born residents (44 percent versus 54 percent islandwide) and fewer residents born in other states (26 percent versus 30 percent islandwide).

Among the sub-areas, there were major variations in residents' birth places. Sub-Area 1 had the highest proportion of foreign-born residents, with over one-third of the residents born outside of the United States. Almost half of Sub-Area 3's population were born in another state, and over 30 percent were born in another country; only 19 percent were Hawai'i-born residents. In Sub-Area 2, over 69 percent were Hawai'i-born residents.

Table 3: Place of Birth and Previous Residence, 1990

	O'ahu	Study Area	Sub-Area 1	Sub-Area 2	Sub-Area 3	Sub-Area 4
Place of Birth						
Hawai'i-born	54.2%	44.5%	43.8%	69.4%	19.3%	44.3%
Other U.S.	30.1%	25.7%	20.4%	12.7%	49.5%	31.0%
Abroad	15.7%	29.8%	35.7%	17.8%	31.1%	24.6%
Residence 5 Years Earlier						
<i>(Persons 5 Years and older)</i>						
Same house	50.3%	48.5%	50.7%	56.3%	45.2%	16.3%
Same Island	25.9%	29.4%	28.5%	32.9%	18.0%	62.3%
Other Island	1.1%	0.8%	0.8%	0.8%	0.8%	0.0%
Other State	17.3%	13.1%	10.6%	6.8%	24.3%	15.7%
Abroad	5.3%	8.2%	9.3%	3.3%	11.6%	5.7%

Sources: U.S. Bureau of the Census, 1992 and 1991.

While the Study Area contains many residents who originated from other areas, residential stability is similar to islandwide conditions. Almost half of Study Area residents (48.5 percent) lived in the same house five years prior to the 1990 census, as compared to 50 percent of O'ahu residents. The exception was Sub-Area 4, in which only 16 percent lived in the same house five years prior to census-taking. This is due to recent in-migration in Kaka'ako related to redevelopment efforts.

As Table 4 indicates, the overall Study Area varies slightly from educational statistics of O'ahu-wide residents. While there is a greater proportion of people who did not complete high school, there is also a greater proportion of college graduates.

There is significant variation in education within the Study Area, however. Sub-Areas 3 and 4, which generally comprise the 'ewa half of the Study Area, have very few residents who did not complete high school. Islandwide, 19 percent of the population did not graduate from high school. In Sub-Areas 3 and 4, only 12 and eight percent, respectively, did not complete high school. Both areas also had significant proportions of college graduates. In Sub-Area 4, almost 57 percent of the total population had college degrees; in Sub-Area 3, 38 percent. It is noted that both Sub-Areas had relatively high proportions of people born in another State and in another country.

In Sub-Area 2, on the other hand, only 16 percent of the population were college graduates, and almost 23 percent did not complete high school. In Sub-Area 1, over one-fourth of the residents did not complete high school and 21 percent were college graduates.

Unemployment was generally low in the Study Area. In 1990, the unemployment rate on O'ahu was 3.5 percent, as compared to 2.5 percent in the overall Study Area. Unemployment rates ranged from 2.2 percent in Sub-Area 1 to 4.2 percent in Sub-Area 2.

In terms of occupations, the overall Study Area profile was similar to the 1990 islandwide profile. As with education, however, there were significant variations among the different Sub-Areas. In Sub-Areas 3 and 4, there were high proportions of residents employed in higher-paying occupations. Almost 56 and 39 percent of, respectively, Sub-Areas 3 and 4 labor force held jobs at managerial or professional levels; this is high compared to the County's 28 percent.

In Sub-Areas 1 and 2, there were high proportions of occupations in technical/sales, service, precision/craft and operations/labor.

Table 4: Education and Labor Force

	O'ahu	Study Area	Sub-Area 1	Sub-Area 2	Sub-Area 3	Sub-Area 4
Educational Attainment (aged 25+)						
Less than high school	18.8%	21.3%	26.9%	22.6%	12.3%	7.8%
High school graduate	28.4%	25.1%	26.8%	30.4%	20.9%	11.1%
Some College	28.2%	27.4%	25.7%	31.2%	28.4%	24.4%
College 4 Years+	24.6%	26.3%	20.6%	15.8%	38.5%	56.8%
Labor force (aged 16+)	651,920	9,841	4,822	2,190	2,165	664
Civilian Labor Force	62.9%	61.6%	57.2%	71.7%	57.8%	73.1%
Armed Forces	8.2%	1.0%	0.8%	0.5%	2.0%	0.0%
Not in Labor Force	28.9%	37.4%	42.0%	27.8%	40.2%	26.8%
Unemployed Civilian Labor Force	3.5%	2.5%	2.2%	1.2%	4.2%	3.7%
Occupation (aged 16+)(1)						
Managerial/Prof.	27.7%	28.6%	24.9%	19.1%	38.7%	56.0%
Technical/Sales	34.6%	34.7%	37.2%	34.2%	30.8%	31.6%
Service	16.8%	17.7%	21.3%	15.8%	16.0%	7.1%
Farm/Fishing	1.5%	0.7%	0.6%	1.2%	0.6%	0.0%
Precision/Craft	9.9%	10.3%	8.3%	16.4%	9.9%	3.2%
Operator/Laborer	9.5%	8.0%	7.7%	13.4%	4.0%	2.1%

Source: U.S. Bureau of the Census, 1992 and 1991.

1) This category includes all civilians 16 years old and over who were either "at work" or "with a job but not at work" during the reference week. Based on Summary Tape File 3A, User Note 2, Definitions of Subject Characteristics.

2.3 Family Characteristics

The Study Area was generally less family-oriented than the O'ahu-wide community in 1990. As indicated in Table 5, 82.4 percent of the islandwide population resided in family households, whereas only 57 percent of the Study Area population lived in families in 1990.

Table 5: Family Characteristics, 1990

	O'ahu	Study Area	Sub-Area 1	Sub-Area 2	Sub-Area 3	Sub-Area 4
% of Persons in Families	82.5%	57.4%	52.6%	65.4%	57.5%	64.9%
Persons per Family	3.5	N/A	2.52	2.76	2.34	2.49
Family House-Married Couples	199,597	2,500	1,102	570	638	190
WI Children Under 18	81.5%	76.0%	73.8%	73.7%	81.3%	78.4%
Male Householder	39.4%	57.6%	57.9%	49.1%	62.1%	65.8%
WI Children Under 18	5.4%	7.6%	6.0%	8.6%	7.4%	14.7%
Female House-	1.8%	6.6%	4.4%	8.6%	6.3%	14.7%
WI Children Under 18	13.1%	16.4%	20.2%	17.7%	11.3%	6.8%
	5.8%	11.2%	14.8%	13.2%	5.6%	3.7%
Median Family Income	\$45,313	N/A	\$28,391	\$31,061	\$47,833	\$55,000
Families Below Poverty Level (1)	5.4%	7.4%	8.9%	4.7%	6.7%	8.4%

Sources, U.S. Bureau of the Census, 1992 and 1991.

(1) The poverty thresholds are revised annually to allow for changes in the cost of living as reflected in the Consumer Price Index. The average poverty threshold for a family of four was \$12,674 in 1989. From Summary File Tape 3A, User Note 2, Definitions of Subject Characteristics; U.S. Bureau of the Census, 1992.

Study Area families were also typically smaller than islandwide averages. The average family size on O'ahu was 3.5 persons. In the Study Area, family sizes ranged from 2.34 (Sub-Area 3) to 2.76 persons (Sub-Area 2).

Except for Sub-Area 3, the Study Area had proportionally fewer married couples. Slightly over three-fourths of the Study Area's family households contained married couples, as compared to 81 percent throughout O'ahu. Subsequently, there were more family households headed by a male (7.6 percent), and by a female (16.3 percent).

Median family income was generally lower in the eastern portion of the Study Area, than in the western half. Sub-Areas 1 and 2 had 1990 median family incomes of \$28,391 and \$31,061, which were significantly lower than the island's median family income of \$45,313. On the other hand, the median family incomes in Sub-District's 3 and 4 were both higher than O'ahu's median with \$47,833 and \$55,000, respectively.

There were proportionally more people who had incomes below poverty level. In 1990, 7.4 percent of Study Area families were below poverty level, which is high compared to 5.4 percent islandwide. The highest proportions were found in Sub-Area 1 (8.9 percent) and Sub-Area 4 (8.4 percent). Note that, in Sub-Area 4, the combination of a high family median income and high proportion of families below poverty level, indicates significant economic disparity among residents.

2.4 Housing and Households

In 1990, the Study Area contained 6,655 housing units, as shown in Table 6. Consistent with the population distribution pattern, about half of Study Area housing units, or 3,346 units, are found in Sub-Area 1. Sub-Area 4 contains the least number of units with 436 housing units.

The majority of the Study Area's housing units are occupied by renters. Almost 63 percent of the units are renter-occupied, compared to 45 percent islandwide. Sub-Area 2 had the highest proportion of renter-occupied units, with 78 percent in this category.

There was also a high vacancy rate recorded during census taking. Overall, 8.5 percent of the Study Area housing units were vacant in 1990, as compared to 5.8 percent islandwide.

Table 6: Housing Stock and Household Characteristics

	O`ahu	Study Area	Sub-Area 1	Sub-Area 2	Sub-Area 3	Sub-Area 4
Housing Units	281,683	6,655	3,346	1,250	1,622	437
Owner Occupied	49.0%	28.5%	27.5%	17.7%	34.0%	47.1%
Renter Occupied	45.2%	62.9%	68.7%	77.9%	46.4%	37.1%
Vacant	5.8%	8.5%	3.8%	4.4%	19.5%	15.8%
Units per Structure						
1 Detached	44.9%	2.0%	0.3%	8.8%	0.4%	1.4%
1 Attached	10.3%	0.7%	0.3%	2.5%	0.2%	0.0%
2 to 9 Units	13.4%	10.2%	1.9%	42.9%	4.0%	4.1%
10 to 50 Units	12.2%	15.4%	12.7%	35.0%	8.5%	5.0%
More Than 50	17.8%	70.3%	83.2%	9.8%	85.7%	87.6%
Other	1.5%	1.4%	1.6%	1.1%	1.2%	1.8%
Occupied Housing Units	265,304	6,088	3,220	1,195	1,305	368
Household Size	3.02	1.75	1.63	1.96	1.70	1.89
Median Value of owner-occupied units	\$283,600	N/A	\$450,000	\$306,300	\$87,500	\$162,500
Median Rent of renter-occupied units	\$615	N/A	\$574	\$482	\$765	\$1,001
Persons / room						
1.00 to 1.50 (1)	8.2%	3.9%	2.9%	7.6%	3.1%	4.1%
1.51 or more (2)	8.2%	12.5%	15.7%	11.0%	8.0%	4.1%

Source, U.S. Bureau of the Census, 1991; Summary Tape File 1A.

(1) Indicates "mildly crowded" conditions.

(2) Indicates "very crowded" conditions.

This high vacancy rate was due to the presence of unoccupied, recently-completed housing units. Both Sub-Areas 3 and 4 are currently undergoing active redevelopment, and, in 1990, they had high housing vacancy rates of 19.5 and 15.7 percent, respectively. On the other hand, the older neighborhoods in Sub-Area 1 and 2 had low housing vacancy rates of 3.8 and 4.4 percent, respectively.

The density of residential structures in the Study Area is high. Over 70 percent of the total units are in buildings with more than 50 units. The majority of housing units in Sub-Areas 1 (83 percent), 2 (86 percent), and 4 (88 percent) are located in apartment buildings with 50 or more units.

Household sizes are small in the Study Area, ranging from a low of 1.63 persons in Sub-Area 1 to a high of 1.96 in Sub-Area 2.

Median rent in the Study Area was generally high in the Sub-Areas being redeveloped, but low in the older areas. In 1990, the O'ahu median rent was \$615. At the same time the median rents in Sub-Areas 3 and 4 were \$765 and \$1,001, respectively. Lower rents were found in Sub-Areas 1 and 2, where the median rents were \$574 and \$482.

It is noted that Table 6 contains median values of owner-occupied units, and suggests that some values are well below the islandwide median. This information is somewhat misleading, however, in that most of the Study Area's housing units are renter-occupied.

An indication of crowding in housing is the number of persons per room. Generally, if a unit contains one to 1.5 persons per room, it is considered mildly crowded. More persons per room suggests "very crowded" situations. In the Study Area, many of the units in the older neighborhoods may be considered over-crowded. On O'ahu, 8.2 percent of the total housing units were reported to have 1.5 or more persons per room.

In the Study Area, over 12 percent of the housing units were in this category. In Sub-Areas 1 and 2, 16 and eleven percent of the total units were considered "very crowded." In contrast is Sub-Area 4, in which only four percent fit this category.

2.5 Summary of Study Area Characteristics

Demographics

In 1990, the Study Area contained an estimated 10,657 residents. Almost half of these lived in Sub-Area 1.

People of Japanese ancestry comprised one-third of the total Study Area population; this is a high proportion when compared to the islandwide share of 23 percent. The next largest ethnic group was Caucasian at 29 percent. The Study Area also had relatively high proportions of Chinese and Korean residents.

The Study Area is generally older than the islandwide community. There were proportionally fewer youngsters and more elderly residents. Compared to the islandwide median age of 32.2 years, Study Area median ages ranged from 36.7 in Sub-Area 4 to 46.7 in Sub-Area 3.

When compared to the islandwide community, more Study Area residents originated from another country. Almost 30 percent were born abroad. In Sub-Area 1, over one-third of the residents were foreign-born. There was also a high proportion of people born in another state. In Sub-Area 3, almost half of the population was born in another state and over 30 percent were born in another country. The only exception to this trend was Sub-Area 2, where over 69 percent of the residents were Hawai'i-born.

There were significant variations in educational attainment among the different Sub-Areas. In Sub-Areas 3 and 4, 58 and 38 percent, respectively, completed four years of college; this is high compared to 26 percent islandwide. In Sub-Area 2, on the other hand, only 16 percent were college graduates. In Sub-Area 1, over one-fourth did not complete high school and 21 percent had a four-year college education.

The Study Area had an unemployment rate of 2.5 percent which is low compared to the islandwide rate of 3.5 percent in 1990.

Family Characteristics

The Study Area was generally less family-oriented. Only 57 percent of the Study Area population lived in families, as compared to an islandwide proportion of 82.4 percent. Slightly over 75 percent of the family households were married couples and there were proportionally more families headed by single males and single females than throughout O'ahu.

The O'ahu median family income was \$45,313 in 1990. Median family income was low in Sub-Areas 1 and 2, at \$28,391 and \$31,061, respectively. In Sub-Areas 3 and 4, the median family incomes were high at \$47,833 and \$55,000, respectively.

Housing and Households

In 1990, the Study Area contained 6,655 housing units. The majority, or almost 63 percent, were renter-occupied. Household sizes were small, ranging from 1.63 persons in Sub-Area 1 to 1.96 in Sub-Area 2.

Overall, there was a higher than average vacancy rate in the Study Area, but this is attributed to the presence of unoccupied, recently-built homes in Kaka'ako during census taking.

Median rent was generally high in the Sub-Areas under redevelopment, but low in the older areas. Median rents in Sub-Areas 3 and 4 were \$765 and \$1,001, while the median rents of Sub-Areas 1 and 2 were \$574 and \$482, respectively.

Over twelve percent of the Study Area were considered crowded in 1990. In Sub-Areas 1 and 2, 15.7 and eleven percent, respectively, of the housing units contained more than 1.5 persons per room.

Section 3. Major Forces for Change Without Hale Kewalo

The Study Area is a region of transition. It lies between the visitor-oriented Waikiki and Honolulu's Financial District, and fronts the residential neighborhoods of Makiki and Punchbowl. Within the Study Area are pockets of older neighborhoods punctuated by newer high-rises. Cleared lots and abandoned buildings hint of future development, and consolidated blocks of development will bring a new look to the Study Area's urban complexion. The Kakaako Community Development District is one of the major forces for change in the Study Area.

Hale Kewalo is being proposed in this context of change. This section extends the baseline data presented in Section 2, and looks at what is possible in the area without the development of Hale Kewalo. This information is part of the social context in which Hale Kewalo may occur.

Section 3.1 discusses the major policies which guide the future of the Study Area. Major development proposals in the vicinity of the project site are presented in Section 3.2. A possible future scenario without Hale Kewalo is presented in Section 3.3.

3.1 Major Policies Guiding the Study Area

Public policies recognize the development potential of the Study Area. This section discusses major policies which guide the future of the Study Area, with particular emphasis on the project site and nearby areas.

3.1.1 The Kakaako Community Development District Mauka Area Plan

One of the forces for change in the Study Area is the State government through the Hawaii Community Development Authority. Hereby referred to as HCDA, this Authority is responsible for planning and implementing community development programs in a portion of the Study Area. The Kakaako Community Development District comprises Mauka and Makai Areas, and the project site is part of the former. The Mauka Area is bounded by Pi'ikoi Street, Ala Moana Boulevard, Punchbowl Street and King Street.

HCDA has prepared and is implementing a plan for this approximately 450 acres. The plan provides a framework for district-wide development and improvements through the year 2012; it guides public and private sector actions in the area's revitalization. The following highlights Mauka Area Plan policies and provisions which have particular relevance to this social impact assessment:

- **Land Use Plan.**

The Mauka Area Plan provides for the potential development of 36.1 million square feet of floor area in the District. Thirty-eight percent is allocated for commercial uses, 15 percent for industrial uses, and 47 percent for residential uses.

It is noted that for projection purposes, the expected scale of development is less than ultimate build-out. HCDA has been estimated that 50 percent of the development potential could be achieved in the initial development units and subsequent development would attain 70 percent of the potential.⁴ Current trends indicate that a likely 15.2 million square feet of new floor area would be developed by 2010.

The Mauka Area Plan emphasizes the need for mixed use development in Kaka'ako, and consolidated blocks, those which are combinations of two or more city blocks, are encouraged as a mechanism for optimizing mixed uses. A typical mixed use project would have parking, commercial and industrial uses in platforms up to 45 feet. Abutting or above the platforms would be towers containing residential, office and commercial uses.

The Hale Kewalo project site is designated Public on the Land Use Plan, as are the McKinley High School and Blaisdell Center sites. Across the 'ewa and makai sides of this block, the predominant designation is Mixed Use Zone - Commercial. Across the Diamond Head side of the project site, the areas are designated Mixed Use Zone - Residential, and Mixed Use Zone - Residential A.

⁴ *From the Mauka Area Plan Cost-Benefit Analysis.*

• **Housing.**

When the State Legislature laid the foundation for development in Kaka'ako, it called for residential development which is varied and integrated. There is to be a mixture of densities and building types, as well as building configurations. Social and economic integration is to occur both vertically and horizontally. Further there is to be an increased supply of housing for residents with low- and moderate incomes.

At maximum build-out, approximately 17.1 million square feet can be allocated for residential uses; this represents an estimated 19,000 housing units. Twelve percent of the units are to target people with "very low income," and another 26 percent is to be allocated for people in the low and low-moderate income group. The remaining units will be distributed among the Hula Mae group (seven percent), the unserved group (30 percent) and the unassisted group (25 percent).

The actual expected build-out to 2010 for residential use is approximately 13.1 million square feet. Given current trends in average unit size, approximately 10,400 new units are expected to be developed in this period.

• **Housing Support Facilities.**

The Mauka Area plan identifies several housing support facilities, including day care centers, minor health facilities, churches, commercial service, community centers and elementary schools.

The anticipated growth in numbers of school age children indicates that two new elementary schools will be required.⁵ There would be approximately 2,200 elementary school age children from the ultimate build-out population of 47,500 in the Mauka Area. However, based on the actual expected build-out by 2010, a population of 22,700 is anticipated generating approximately 930 students, based on DOE projections.

⁵ This is based on projections made in 1990. It was initially estimated that five new schools would be needed. The estimate was adjusted downward based on an analysis of the unused capacity of elementary schools surrounding the Mauka Area.

According to the Mauka Area Plan, the vicinity of the former Pohukaina Elementary School might be the appropriate location of the first new elementary school. Others would be added as the need arises, but limited space dictates sites available. Another suggested site was shared space with Kapiolani Community College "should activities there be reduced."

The plan anticipated that additional police and fire protection services for the projected population would not be needed, nor would additional major health care services. Minor health care facilities will be allowed in proximity to residents.

Day care centers are to be developed by both public and private developers in primarily residential emphasis areas.

- **Open Space and Recreation**

Open space provides visual and psychological relief from urban development, helps provide adequate light and air to land uses, creates opportunities for on-site recreation, and provides linkages among activity centers.

Kaka'ako has finite resources for community-wide open space, parks and recreation facilities. Much of the open space and recreation areas will have to be privately provided and financed. When fully developed the district is projected to have 75 acres of recreational space; half will be in public parks and facilities and the other in private developments.

Urban parks will function as passive recreational areas used by patrons and employees of commercial establishments for rest breaks from shopping and work. Private developers can use these as a way to satisfy the on-site recreation and open space requirements.

Large community or neighborhood parks are the responsibility of the public sector. The current Mauka Area plan calls for one at-grade park (Mother Waldron Park at Pohukaina and Cooke Streets). The other community/neighborhood parks will be atop parking facilities.

Since Ala Moana Park alone will not be able to serve as a regional park on a sustained basis with the expected population increase, the proposed Waterfront Park, which will eventually encompass 60 acres, will serve the additional population burden.

3.1.2 City Development Plans

Another force for change in the Study Area is the City Development Plan for the Primary Urban Center (PUC). The Kakaako Community Development District portion of the Study Area is not governed by the PUC Development Plan, but the remaining area is under the City's jurisdiction.

The PUC encompasses the portion of O'ahu from Wai'alaie-Kahala to Pearl City, and is the most densely populated part of O'ahu. The General Plan Objectives and Policies for the City and County of Honolulu indicate the PUC should accommodate between 45.1 and 49.8 percent of O'ahu's population by the year 2010. Based on the State Department of Business and Economic Development estimate for that year, the PUC population would range from 450,000 to 497,800 persons.

The project site is just outside the City's Kaka'ako Special Area, as identified by the Special Provisions for the PUC in the Development Plan. The boundaries of the City's Kaka'ako area are similar to that of HCDA, except that the State's boundaries extend further 'ewa, and the McKinley High School/Neal Blaisdell Center block and the adjacent residential area up to Pi'ikoi Street are excluded from the City's Kaka'ako Special Area.

The PUC Special Provisions encourage mixed use redevelopment in the areas near the project site and the preservation of mauka-makai views of Punchbowl. The predominant form of development is Commercial Emphasis Mixed Use, with some areas set aside for Commercial-Industrial Emphasis Mixed Use.

3.1.3 Other Policies

The project site is near two other areas which are governed by special rules, as follows:

- **Alapai-Sheridan Special Area.**

The PUC Special Provisions identify the Alapai-Sheridan Special Area, as that bounded by Alapai Street on the 'ewa side and Punahou Street and the Makiki Drainage Ditch on the Diamond Head side. It runs mauka - makai from the H-1 Freeway to Kapiolani Boulevard, and Pi'ikoi and King Streets. The PUC Development Plan calls for medium-density and high-

density apartments in this area, in combination with commercial and mixed use developments.

- **Thomas Square/Academy of Arts Special District**

A portion of the Neal Blaisdell Center/McKinley High School block is in the Thomas Square/Academy of Arts Special District. Both Thomas Square and the Academy of Arts are on the National Register of Historic Places. Thomas Square, a formal symmetric park, has historic significance as the place where Sovereignty of the Hawaiian Kingdom was restored to the Kamehameha III by Great Britain. It lies between The Academy of Arts and Blaisdell Concert Hall giving a serene continuance of green open space. On the Diamond Head side of the park is the restored Linekoa School. Both accommodate numerous community arts and special events functions.

The boundaries of this Special District extend to the Capitol Special District on the 'ewa side. On the mauka side, the H-1 Freeway and Vineyard Boulevard demarcate it from Punchbowl Crater. On the Diamond Head side, it includes Victoria Street and Linekoa School, frontage of Beretania to Pensacola and the frontage of King Street to Pensacola. On the makai side, the boundary includes the frontage of McKinley High School, the Neal Blaisdell Center Concert Hall, and the corridor on both sides of Ward Avenue to Kapiolani Boulevard.

To preserve the integrity of Thomas Square and the Honolulu Academy of Arts, the Land Use Ordinance contains rules regulating building height, open space, signs and landscaping in this area.

3.2 Major Development Proposals Near the Project Site

Development in the Study Area is imminent. Table 7 lists those projects in the portion of the Study Area which is the Kaka'ako Community Development District. Additional information about other developments in and near the Study Area follows that table.

Table 7: Major Planned Development Projects in the Kakaako Community Development District Mauka Area^a

Proposed Project	Number of Residential Units	Status
One Waterfront Plaza and Towers	307	Completed
The Pacific Park Plaza (including Royal Capitol Plaza)	297	Completed
404 Pi'ikoi	1,400	Partially completed
Waterpark towers	560	Sitework activity
Imperial Plaza	221	Completed
Kamakee Vista	227	Completed
Pohulani	263	Completed
1230 Kapiolani	348	Litigation pending
Queen Emmalani	268	Sitework activity
Majestic Plaza	335	Not started
Kauhale Kakaako	268	Completion scheduled for 8/93
Na Lei Hulu Kupuna	76	Completed
Symphony Park	301	Sitework Activity
King Street Place	284	Concurrent with previous project

a. Does not include the remaining portion of the Study Area

Sources: Information from HCDA dated 2/11/93 and related news articles.

In addition to the developments in Kaka'ako, there are two other major developments proposed:

- **Keeaumoku Superblock**

The Keeaumoku Superblock is being proposed by developer Keeaumoku Partners. The project site is bounded by Ke'eaumoku, Rycroft, Sheridan and Makaloa Streets. Plans call for 400,000 square feet of retail space, 4,000 parking spaces, 460,000 square feet of office space and more than 200 residential units. Construction is expected to begin in late 1993.⁶

- **Pawaa Superblock**

Just outside the Study Area, the Pawa'a Superblock is proposed by the City and County of Honolulu for a portion of two blocks in the area between Kalakaua Avenue and Ke'eaumoku Street, and extending from Beretania to King Streets. The project was recently revised to include 1,800 residential units, and also includes retail space, open space and parking.

In the vicinity of Hale Kewalo are several changes in the near and long-term time frame. The following highlights those changes nearest the project site:

- **Renovation of McKinley High School building.**

Building A, which is located near the mauka-'ewa side of the project site, currently houses McKinley High School's auditorium and some classrooms. The building has problems with the second floor ceiling, dry rot and termite damage, and students are being moved out of portions of the structure. The State House of Representatives recently earmarked \$17 million to hasten the renovation of this building and designated HCDA to implement the renovation.⁷ The State Senate has not acted on this matter.

- **Expansion and renovation of the Neal Blaisdell Center.**

The 28-year old Neal Blaisdell Center, located 'ewa of the project site, is scheduled for expansion and renovation. Included in the plans are a freestanding box office, a two-story galleria entrance hall, a 30-foot extension into the Ward Avenue portion of that site, and the enclosure of

⁶ Earthplan, 1992.

⁷ Ashizawa, 1993.

the exhibition area and its meeting rooms. Improvements are expected to begin this year.⁸

- **1230 Kapiolani.**

Directly opposite the proposed Hale Kewalo site is the proposed 1230 Kapiolani project. The six-acre site is bounded by Kapi'olani Boulevard, Pi'ikoi Street, Pensacola Street, and Kamaile Street. Honolulu Electrical Supplies, a Shell Service Station and Rainbow Chevrolet formerly resided on this site, and the site is currently unoccupied.

Developer Asahi Jyoken is planning a mixed use complex to accommodate residential, commercial and industrial activities, as well as parking. Preliminary plans call for two 39-story, 400-foot towers with parking, commercial, industrial and commercial space. HCDA granted a permit for the project in 1989.⁹

The service station portion of the site has been cleared. Rainbow Chevrolet is asking for a declaration so it can reoccupy the property at 630 Pi'ikoi because of Asahi Jyoken's "failure to commence and maintain construction on the property." Allegedly it was to receive about 45,000 square ft. of commercial and industrial space at the site starting Oct. 1992.¹⁰

- **Majestic Plaza.**

The Majestic Plaza is planned for a 3.5-acre site on Kapiolani Boulevard where the Kodak Building and adjoining businesses now stand. Developer Colin daSilva plans to construct twin towers comprising 310 residential units. The site has not been cleared and start-up date is undecided until daSilva's nearby Imperial Plaza at Kapiolani Boulevard and Cooke Street has been completed.¹¹

⁸. Watanabe, 1992.

⁹. Rodrigo, 1992.

¹⁰. Same as Footnote #6.

¹¹. Honolulu Star-Bulletin, 1991.

- **Symphony Park.**

Proposed by The Myers Corporation, the Symphony Park project at the corner of Kapiolani Boulevard and Ward Avenue is planned to accommodate 400,000 square feet of residential space, 650 parking stalls and 44,000 square feet of commercial space.

The project received approval in June 1992. The site has been cleared and soil remediation work is continuing. The time frame for completing the project is dependent on the economic climate.¹²

- **King Street Place.**

The King Street Place is also proposed by the Myers Corporation. This project is located at King and Archer Streets, and includes a 41-story tower with 284 units. The units will meet the affordable housing unit requirement of Symphony Park and is scheduled to be completed concurrently with the former project.

3.3 Possible Future Scenario Without the Hale Kewalo Project

The Study Area is and will continue to undergo major changes regardless of whether the project site is redeveloped. The following are possible changes which could occur:

- **Major residential growth**

According to HCDA, the expected residential build-out in the Kakaako Community Development District by 2010 is estimated at 10,400 units; these could accommodate an estimated 22,700 residents.¹³

¹² Information on Symphony Park and King Street Place was derived from Pacific Business News, 1992 and obtained by telephone conversation with Cindy Thomas, Project Manager at The Myers Corporation, on March 3, 1993.

¹³ HCDA, "Residential Unit Type Projections to Year 2010," January 1993.

Without Hale Kewalo, the currently-planned residential projects in Kaka'ako and the rest of the Study Area could generate a residential population of between 9,300 to 11,800 persons, as indicated in Table 8. This means that, even if only the currently-planned projects are implemented, the population could double the Study Area's 1990 estimated population of 10,657 persons.

Table 8: Potential Residential Population Increase Resulting from Major Development Proposals

	Current Number of Units	Potential Residential Population (1)
Projects in Kakaako Community Development District (2)	5,155	9,022 to 11,341
Keeaumoku Superblock	200	350 to 440
Total	7,503	9,372 to 11,781

(1) Based on household sizes ranging from 1.75 persons, which was the average household size in the Study Area in 1990, to 2.2 persons, which is used by HCDA in estimating population.
(2) See Table 7 for breakdown of units.

- **Increased need for planning public services and facilities.**

Adding over 22,000 people over the next 15 to 20 years will significantly increase the need for public services and facilities. Public agencies and departments are required to be responsive to this planned growth, and will need to program mechanisms for accommodating the increase in residents. A similar situation is occurring in 'Ewa, with the development of Kapolei. To accommodate the anticipated growth, public agencies have prepared plans to add another school complex, new fire stations and headquarters, and a new police district.

- **Pace of growth dependent on economy.**

With the current downturn in the economy, the pace of development in the Study Area has slowed. Private developers are awaiting a more favorable financing climate, and most of the more recently-completed projects are

government-sponsored. Hence, while there is major growth anticipated, the rate of growth may be lower than originally projected.

- **Predominant use on the Diamond Head side of the project site expected to continue to be residential.**

The project site is expected to have mostly residential uses on its eastern or Diamond Head side. The proposed 1230 Kapiolani project has a residential emphasis and the area mauka of that site is designated for mixed use with a residential emphasis. Further, except for the 1230 proposal, the low-rise residential character is likely to be retained over the next few years.

- **High-rise and commercial mixed use character expected to be predominant on makai side of project site.**

The area on the makai side of the project site is planned for mixed use with a commercial emphasis. This means that the existing low-rise commercial and office buildings will be replaced with higher density and more intense activity in the future. Further, the current low-rise industrial character is expected to diminish as Kaka'ako is revitalized.

- **Retention of current public uses on the Neal Blaisdell Center/McKinley High School block.**

The block in which the project site is located is dedicated to public use. It is expected that the current public gathering and educational uses will continue, regardless of implementation of Hale Kewalo.

- **Retention of control of the project site by University of Hawaii.**

The no-action alternative for this project is that the land will revert to UH if Hale Kewalo is not implemented. If that occurs, UH will resume its earlier efforts to provide faculty housing on this site in conjunction with the private sector. UH officials have also indicated that Building 857 may be renovated to accommodate various programs located in private office space

Hale Kewalo Social Impact Assessment

Prepared by Earthplan

in Honolulu. This is expected to provide an additional revenue source which may be critical in providing sufficient cash flow from the project to support an increased revenue bond requirement caused by the delay of Hale Kewalo.¹⁴

¹⁴ Based on letter dated 26 January 1993 from Ralph T. Horii, Jr. Vice President for Finance and Operations to Mike McElroy, Housing Finance and Development Corporation

Section 4. Potential Social Impacts of Hale Kewalo

This section discusses potential social impacts related to Hale Kewalo. Section 4.1 presents population and demographic impacts due to the proposed increase in residential units. Section 4.2 discusses impacts on the supply of affordable and faculty housing units.

The effects of Hale Kewalo on the character of the surrounding neighborhood is discussed in Section 4.3. Section 4.4 explores impacts on the immediately adjacent uses. Project impacts on public services and facilities are presented in Section 4.5.

4.1 Residential Population Growth and Demographics

The project will add 530 housing units to the housing supply. As presented in Table 9, this increase could result in a population increase of between 927 to 1,166 persons. The low end of the population is based on the Study Area's 1990 average household size of 1.75 persons. The high end is based on the average household size of 2.2 persons used by HCDA in estimating population.

Table 9: Population Increase Due to Hale Kewalo

Estimated population of Hale Kewalo (1)	927	to	1,166
Estimated 2010 Population for PUC DP area (2)		469,600	
Project's share of 2010 PUC population	0.1%	to	0.2%
Estimated 1990 Study Area population (3)		10,657	
Estimated Study Area population with Hale Kewalo redevelopment	11,584	to	11,823
% increase in Study Area population due to project	8.7%	to	10.9%

(1) The low end of the population is based on the Study Area's 1990 average household size of 1.75 persons. The high end is based on an average household size of 2.2 persons used by HCDA in estimating population.

(2) Based on Table II-1 of "Development Plan Status Review" for Fiscal Year 1991, as prepared by the City Department of General Planning.

(3) Based on U.S. Department of Commerce, Bureau of the Census, 1991.

In the overall PUC, this impact is minor. The project's population would increase the PUC Development Plan's population by less than 0.3 percent. This increase is well within the General Plan guidelines for the area. In the Study Area, Hale Kewalo would increase the resident population by between nine and eleven percent.

Residents of Hale Kewalo are not expected to significantly alter the current or anticipated demographic profile of the Study Area. As presented in Section 2, the Study Area has significant proportions of residents of Japanese ancestry, and is generally older than the islandwide community. A relatively large proportion were born in another country or another state. Further, in terms of income and educational attainment, there were significant variations among the different neighborhoods. The Sub-Area in which the project site is located tended to be better educated, but exhibited signs of economic disparity with a high median income and high poverty levels. The following are possible additions due to the proposed project:

- **Income levels.**

Hale Kewalo will add more residents with average and below average incomes. The Study Area residents already exhibit a cross-section of economic levels. Further, with HCDA's mandate to develop more affordable units in Kaka'ako, it is expected that the income levels in the Study Area will continue to evolve into a more well-rounded profile.

- **Age and ethnicity.**

Hale Kewalo will likely attract many young married couples or single people just entering the housing market. Further, many of the UH faculty recruits are likely to be young. Hence, age-wise, on-site residents may be younger than the overall population. This trend is expected to increasingly occur as the region is revitalized. Ethnic diversity is also likely to increase with the project, simply because of the increase in housing units.

- **Education and Origin.**

Similar to the differences among the educational attainment of the different Sub-Areas, the on-site residents will likely display a wide diversity of educational credentials. The UH faculty will likely be among the more educated in the complex, and will likely originate from outside Hawai'i.

4.2 Impact on Housing Supply

4.2.1 Impact on the Supply of Affordable Housing Units

It is estimated that, by 2000, 85,000 housing units are needed to meet the projected formation of new households in Hawai'i. Of these, 64,000, or 75 percent, will be needed in the affordable category. The housing crisis is underscored by several factors including:

- the trend of a continuing very low vacancy rate;
- the increasing homeless population (this population increased from 1,600 people in 1983 to 8,000 in 1990);
- the doubling of the average number of families on waiting lists for federal low-rent housing from 2,700 families in 1982 to 7,000 in 1991.

The need is especially critical in the urban core, which is the center of government, economic and cultural activities, and the State's primary employment center. In the PUC, there were 166,415 housing units in 1990. The PUC is estimated to have 497 acres of developable land for residential uses, and this area has a capacity for 21,671 new residential units.¹⁵

In an effort to address the urban core housing problem, HFDC in 1990 undertook an identification of available, developable, and underutilized State-owned lands that could be used for the development of affordable housing projects. Approximately 80 sites were inventoried. Only six sites were deemed potentially feasible for moderate to large-scale residential development. The Hale Kewalo project site was one of the potential six urban core sites.¹⁶

The proposed project is a vital component in an ongoing effort to increase the supply of affordable housing units. Given the crucial need for housing in Hawai'i, particularly the need for affordable housing in the urban core, every opportunity for this type of development needs to be taken seriously.

¹⁵. City and County of Honolulu Department of General Planning, 1992.

¹⁶. Information provided by HCDA.

Hale Kewalo will have significant positive impact on the supply of affordable rentals in the urban core. These rentals will be a solution for families who cannot afford to buy or rent a market housing unit. Further, the project will provide housing for people who choose to live within urban Honolulu, in proximity to major transportation corridors and employment generators.

4.2.2 Impact on the Supply of Faculty Housing Units

With our statewide housing crisis, the UH faces a special challenge arising from the nature of employment market in which the university and other higher educational facilities operate. Higher education institutions offer compensation which is commonly well below private industry levels, and they compete with government and industry for the most educated and skilled segment of the work force. Institutions in a high-cost housing environment are often at a further disadvantage in recruiting qualified personnel.

In the UH Faculty Housing Assistance Master Plan¹⁷ the housing needs of the different faculty ranks were evaluated. These ranks ranged from Rank 2, Instructor to Rank 5, Professor. There were some variations in the UH faculty salaries when compared to the other colleges and universities, but these variations were not significant. Further, while faculty salaries affect housing affordability, Hawai'i's housing market prices have escalated to levels at which no plausible adjustments to professorial base salaries could adequately serve to close the gap between salaries and housing affordability.

It was found that without effective housing programs, affordability factors and the Hawai'i housing market can be expected to discourage qualified, mid-level Assistant to Associate Professors from seriously considering or remaining at UH. Historically, one-fourth of UH faculty resignations were due to the lack of available affordable housing. The greatest attrition occurs in Rank 3, Assistant Professor.

The UH has established a Faculty Housing Assistance Program which incorporates programs similar to numerous peer research universities located in similarly high-cost housing area. This program has six categories as follows:

¹⁷ KPMP Peat Marwick, 1991.

- Information/Counseling assistance and program administration;
- University rental housing;
- Mortgage assistance;
- Downpayment assistance
- Housing allowance assistance; and
- University for-sale housing

UH is projected to recruit approximately 1,400 faculty between 1991 and 1994. At this time, approximately 200 new faculty members are being recruited by the University of Hawaii each year. Most are of Rank 2 through 4, including Instructors, Assistant Professors and Associate Professors. Faculty who are housed in UH facilities are allowed to stay in faculty housing for a maximum of three years, at which time they are expected to be able to move elsewhere. Typically, there is a turnover of about 100 faculty residents per year.

Currently, the University of Hawaii operates only one faculty housing complex. Located on Dole Street in Manoa, Waihila contains 65 units in a mixture of studio, one-, two- and three-bedroom units.

Of the six different forms of housing assistance programs, the development of rentals is considered a high priority. This effort can be achieved within a relatively short period of time, and will meet the needs of the groups which are currently most at-risk.

UH is planning to develop two faculty rental housing projects, one of which is Hale Kewalo. The other project, as yet unnamed, is located in Manoa near Noelani Elementary School. The project will include 142 units, of which six will be three-bedroom units, and 136 will be two-bedroom units. It is currently in the site preparation phase, and is scheduled to be completed by the summer of 1994. With the completion of both projects, UH will have approximately 400 faculty rental housing units. Waihila will be then used to house married UH students.¹⁸

The only long-range plan to increase faculty housing units is to develop these units in conjunction with the second campus in Kapolei; this action is not expected in the foreseeable future.

¹⁸ Telephone communication with Al Asan, Director of Campus Operations at the University of Hawaii, Manoa campus, March 1, 1993.

Hale Kewalo will have a significantly positive impact on the supply of faculty housing by providing a place to live for in-migrating faculty members. The project site is located near major buslines and thoroughfares, so faculty will be able to easily commute to the UH-Manoa, Kapiolani Community College, Honolulu Community College and UH West Oahu College.

More importantly, the project will benefit the overall quality of education at UH by helping to attract qualified faculty to UH. Hale Kewalo will help UH deal with the projected trend in faculty needs. Institutional competition for qualified university faculty is expected to intensify significantly and highlights of this trend include:

- A reversal of the current trend of declining student enrollment expected to occur around 1995 will generate a national demand for faculty expansion.
- A relatively large wave of retirements among the cohort hired in the 1960s will generate a need for replacement.
- The nation's output of Ph.D.s is not expected to keep pace with needs.

The UH, particularly UH-Manoa which is a research/doctoral university, recruits at both junior and senior faculty levels in a wide array of disciplines and in an international market. Its future ability to maintain its faculty is particularly threatened because of Honolulu's high housing costs. Honolulu's apartment rents rank the highest in the nation; a typical renter pays \$1,040 for an 800-square foot apartment with one bedroom and one bath.¹⁹ This can be a major deterrent for potential faculty members considering moving to Hawai'i for employment. For those whose incomes qualify, affordable faculty housing will be a crucial factor in deciding to move to Hawai'i. Hale Kewalo will thus play a major role in faculty recruitment of faculty currently living outside Hawai'i.

4.3 Change in Character of the Existing Neighborhood

Any project on this site will alter the character of the neighborhood in some way. This section presents a description of the neighborhood as it is today (Section 4.3.1), followed by a summary of what the neighborhood may look like in the future (Section 4.3.2). Section 4.3.3 then discusses the effect of Hale Kewalo on the overall neighborhood.

¹⁹ Daysog, 1993.

4.3.1 Description of the Existing Neighborhood

Immediately Abutting Uses.

The project site is adjacent to McKinley High School. The school's cafeteria, library and adult education facilities are across Building 857 on the uppermost boundary. On the 'ewa side are a rifle range, maintenance building and carpentry skills training area, beyond which is the school's athletic field. This field is used for a variety of purposes, including the school's athletic activities and events, carnivals and fairs, and the staging of running events.

Makai of the Project Site.

The project site fronts Kapi'olani Boulevard on its makai side. This area is characterized by a wide variety of office and commercial establishments and industrial uses in low and mid-rise structures. On the Diamond Head corner of the Pensacola Street - Kapi'olani Boulevard intersection is an office building with commercial and restaurants on the ground floor. Directly behind that building on Hopaka and Kona Streets are several bars and light industrial and commercial businesses in one-story buildings.

Directly across the site on Kapi'olani Boulevard between Pensacola Street and Kamake'e Streets are various commercial and industrial establishments, including:

- office buildings, with a real estate company and a cellular telephone company;
- a restaurant next to a golf supplies shop;
- a carwash and two gas stations; and
- a furniture store, which fronts Kamake'e Street.

Further 'ewa from the project site, between Kamake'e Street and Ward Avenue is the former Kodak building which houses several activities, a restaurant, several small commercial businesses, and a vacant structure at the corner of Ward Avenue and Kapi'olani Boulevard. Behind these uses is Waimanu Street which is dotted by automotive shops and other light industrial uses.

Diamond Head of the Project Site.

The project site fronts Pensacola Street on its Diamond Head side. Immediately across the project site are a vacant warehouse and a vacant lot. This is the site of the proposed 1230 Kapiolani project.

Further mauka on Pensacola Street are two blocks of small two-story apartments from Rycroft Street, Hoolai Street, to Kamaile Street; these apartments are characteristic of the entire area between Pensacola to Pi'ikoi Street. Beyond these residential uses, toward King Street, are a church and school complex and low rise commercial buildings.

'Ewa Side of Project Site.

Beyond McKinley High School, the 'ewa side of the project site is characterized by public gathering areas, construction activities, the headquarters of a utility company, and residential and office high-rises. The Neal Blaisdell Center (NBC) offers several venues for public activities, including an arena, an exhibition hall with meeting rooms and a concert hall; the NBC spans Ward Avenue from King Street to Kapi'olani Boulevard.

Across Ward Avenue is the Symphony Park, a residential/commercial complex currently under construction. Also facing the NBC complex on Ward Avenue are:

- Hawaiian Electric Company's operations;
- a residential high-rise; and
- an office building with a restaurant and athletic club.

A fast-food restaurant is located at the makai corner of Kapi'olani Boulevard and Ward Avenue; a medical clinic/hospital and a medical professional building are located at the mauka corner of King Street and Ward Avenue.

Mauka of the Project Site.

As noted earlier, the project site directly abuts McKinley High School, which forms a major separation between the project site and activities mauka of King Street. These mauka activities include a hospital, a church, office buildings and Thomas Square Park.

4.3.2 Likely Neighborhood Changes Without the Proposed Project.

Section 3.3 explored what would happen in this area regardless of whether Hale Kewalo were implemented. It was found that, even though major residential growth is being planned, the pace of development has slowed and the rate of growth is slower than originally projected. Nevertheless, there will be increased demand for public services and facilities and public agencies will need to plan for the future population.

In the immediate area, residential uses on the Diamond Head side of the project site are expected to be the major land use. Further, except for the 1230 Kapiolani proposal, the current low-rise residential character is likely to be retained over the next few years with change occurring in the long-term time frame. On the makai side of the project site, development is expected to be more intense. It is expected that the low-rise character will be transformed into a higher-density area with taller buildings and significantly more activities.

The current public gathering and educational uses on the Neal Blaisdell Center/McKinley High School block, hereby referred to as the NBC/MHS block, will continue, regardless of implementation of Hale Kewalo. Further, it is very likely that high-rise faculty housing will be developed on the project site if Hale Kewalo were not implemented.

4.3.3 Project's Effect on Neighborhood Character

The following are possible effects of the project on the present and likely neighborhood character in which Hale Kewalo is being proposed:

- **Hale Kewalo will add high-rise structures to an otherwise low-rise area.**

The NBC/MHS block is characterized by low rise structures and open areas. The current condition of the project site contributes to this character. Further, even though there is major development proposed for the neighborhood, the present character of surrounding areas along Pensacola and King Streets, Kapi'olani Boulevard and Ward Avenue is generally low-rise.

The project will alter this character by introducing two high-rises, a parking structure and landscaped open space. While the parking structure and open space will be consistent with other existing elements, the high-rises will be a new element. They will diversify the urban landscape by adding a more city-like appearance to this area.

Further, until the privately-proposed projects are built, Hale Kewalo will have the most prominent structures in the immediate vicinity. As noted earlier, the timing of these other projects, including those for which sitework has begun, is unknown at this time.

- **The high-rise character of Hale Kewalo is consistent with other proposed buildings in this neighborhood.**

Although the NBC/MHS block is not expected to have significant increases in building height in the future, Hale Kewalo will be consistent with the urban landscape expected along the perimeter of the NBC/MHS block. This neighborhood is expected to change to accommodate more residents and more intense commercial activity. More high-rises are expected and lot consolidation will continue to be encouraged.

Consistent with development guidelines set forth in Chapter 206E, HRS, Hale Kewalo will optimize the use of this property. It will increase the supply of affordable housing units. It will accommodate mixed uses. Recreational facilities will be located on-site and open space will be provided, as well as adequate parking. Other projects in the area will have similar characteristics, or will meet such development requirements in some way.

- **The project is consistent with the residential uses proposed in this area.**

Hale Kewalo is consistent with the types of development proposed in this vicinity. As noted earlier, the Diamond Head side of the project site is expected to remain residential in character and the project will not deviate from this pattern. The project is also consistent with the mixed use character and high-rise character anticipated in the area makai of Kapi'olani Boulevard.

- **Hale Kewalo will introduce a new land use and another usage pattern to the NBC/MHS block.**

Currently, activities related to the educational and public gathering functions of the NBC/MHS block are separated from the commercial, industrial and residential uses currently occurring at the perimeter of the project site and the NBC/MHS block by four major thoroughfares.

Further, the existing usage pattern of the site is transient in nature. On-site uses occur during only portions of a day; there are no permanent 24-hour activities. The educational activities are primarily daytime-oriented. The carnivals and fairs occur during the afternoons and nights. Meetings and all-day parking at the Neal Blaisdell Center are mostly daytime activities; entertainment and athletic events occur at night.

The project will change both the land use pattern and the usage pattern by adding residential uses directly adjacent to McKinley High School and in close proximity to the Neal Blaisdell Center. This means that there will be direct impacts on the existing activities, and the compatibility between residential and existing uses is discussed in the next section.

On a more regional level, with people on-site for a 24-hour period, the neighborhood function of the NBC/MHS block will be altered. In addition to being a place where people go to school, work and gather, it will be a place where people live. This will enhance the mixed use potential of, and bring a more neighborhood atmosphere to, NBC/MHS block. From a land use perspective, this can be an optimal use of the land, providing that the various uses can operate compatibly.

- **The project will add attractive landscaped open space and recreational facilities to this area.**

Open space is a premium as more and more areas are redeveloped. Hale Kewalo will improve the neighborhood by adding 1.75 acres of open space. Extending the green, open area of McKinley High School's athletic field, the project's open space will have aesthetic value and can function as a place for recreational activities for the community, as well as on-site residents and workers.

The project also includes recreational amenities which specifically will service Hale Kewalo residents. To be located on the roof of the parking deck are a tot lot, exercise area, barbeque facilities, recreational and meeting rooms, basketball and volleyball courts, and a trellised and grassed area.

4.4 Impacts on Immediately Adjacent Uses

Hale Kewalo will be neighbors with McKinley High School, and to a lesser degree, with the Neal Blaisdell Center. This section examines impacts related to resident complaints (Section 4.4.1), parking (Section 4.4.2), construction (Section 4.4.3) and school expansion (Section 4.4.4).

4.4.1 Resident Complaints

Likelihood of Resident Complaints

The proximity between the residential towers and activities of McKinley High School may lead to incompatibility problems. With residents nearby 24 hours a day, school activities will be under closer scrutiny and noise, light and traffic impacts may stimulate resident concerns.

We found that resident-school compatibility is a problem, and that noise is just one factor in this relationship. A situation comparable to the project's situation is Iolani School and the neighboring Royal Iolani and Iolani Court Plaza residential buildings. In the course of this study, we contacted officials of Iolani School and resident managers of these high-rises to identify historical problems related to proximity between residences in high-rises and the school.

The property on which Royal Iolani and Iolani Court Plaza sit was owned by Iolani Schools prior to fee conversion. As part of the original lease agreement, early residents in these towers have no recourse regarding complaints against the school. Newer residents sign a Disclosure Clause acknowledging the potential for school-related noise. Royal Iolani contains 300 units; Iolani Court, 341.

Residents have complained directly to the school, rather than channel their complaints through the residents managers or to the police officers. The complaints are mostly related to secondary school activities. The most common complaint involves noise from:

- basketball games and regular Physical Education activities conducted at the gym;
- noise from dances;
- outdoor loudspeakers are used for general assembly; and
- carnival activity.

There are also complaints about lights at the swimming pool because swimming practice begins at 5:30 A.M. Parents dropping off and picking up their children have created traffic problems. Some park in condominium parking lots while waiting for their children after school.

In general, the school deals with each complainant personally, and tries to resolve the problem. In some cases, there have been structural or operational changes to accommodate the residents. In terms of traffic, the school has been working with its parents and the Neighborhood Board to resolve the problem.

Responsibility to Mitigate School-Generated Noise Complaints

As the above example suggests, residents tend to complain about noise-generating and other impacts generated by school activities, regardless of which use preceded the other. This does not mean, however, that these complaints will automatically terminate or alter related school activities. Current laws regarding noise actually exempt schools from having to request permission to generate noise.

According to the State Department of Health,²⁰ school noise complaints from residents have been typically against high school marching band activities, school carnivals and elementary school playground noise. Prior to 1989, beat police officers responded to school-related resident complaints. The complaint was registered with the administrative officer and it was the school's responsibility to correct it.

²⁰. Telephone communication with Phillip Wong, Environmental Health Specialist, Noise and Radiation Branch, State Department of Health, January 30, 1993.

In 1989, however, the Hawaii Revised Statutes were changed to exempt schools from noise control requirements. Part 2 of Chapter 342F, Hawaii Revised Statutes reads as follows:

No person, including any public body, shall engage in activity which produces excessive noise without first securing approval in writing from the director, provided that this section shall not apply to any school activity which is approved by school authorities. For the purposes of this section, "school activity" means a public or private school function for students up through the twelfth grade which is approved by the school principal or an authorized representatives. These activities shall be limited to the hours of 7 a.m. to 10 p.m.

For the most part, the decision to address noise complaints generated by residents will lie with school officials. It will not be incumbent upon the school to change or terminate school activities simply because of noise complaints.

It is further noted that McKinley High School will increasingly be subject to potential residential incompatibility regardless of whether Hale Kewalo is implemented. High-rise residential structures are proposed on Pensacola Street, Kapi'olani Boulevard and Ward Avenue. Although residents in these towers will be slightly farther from McKinley High School, they will still experience noise, light and traffic generated by the school.

4.4.2 Parking

During non-school hours, the project site provides public parking for events staged at MHS, such as the farm fair and running events. Implementation of Hale Kewalo may discontinue this practice. Although parking will be provided, the spaces will be used for resident and ETO and McKinley High School activities. Mitigation may include opening up the proposed parking garage to the public during special events.

4.4.3 Construction Activities

Project-related sitework and construction activities from Hale Kewalo, as well as other major development projects in the vicinity, will generate noise and dust. This may disrupt classes and cause discomfort among students, teachers and campus employees. Most of these impacts can be avoided by strict adherence to appropriate regulations.

Generally, the State is responsible for monitoring construction noise around the school areas adjacent to development. The DOE is to implement acoustic noise control and air conditioning of existing and new school facilities which are subject to high levels of noise. If excessive noise occurs, the State may require the developer to install air conditioners at the school so windows could be closed to prevent dust and noise pollution.²¹ In this project, HCDA would be required to initiate such mitigation if the State Department of Health so requires.

4.4.4 Expansion of McKinley High School Facilities

The service area for McKinley High School generally comprises the communities of Alewa/Liliha, Kaka'ako and Moiliili. Feeder schools within the McKinley High School complex include the Kaiulani, Kauluwela, Likelike, Lanakila, Royal, Ala Wai, Kaahumanu and Lunalilo Elementary Schools; and Central and Washington Intermediate Schools.

In recognition of the school's need to expand, particularly in light of the anticipated growth in Kaka'ako, the State prepared the McKinley High School Campus Development Report in 1981.²² This report identified planning criteria and site requirements, recommended an "ultimate plan" and contained related scheduling and budgeting information.

The design enrollment for the recommended plan was 2,400 students. As indicated in Table 10, this projection was based on historic enrollment prepared by the State DOE.

²¹ Telephone communication with Phillip Wong, Environmental Health Specialist, Noise and Radiation Branch, State Department of Health, January 30, 1993. Also derived from Chapter 296-36.5 of the Hawaii Revised Statutes.

²² Charles R. Sutton & Associates, 1981.

Table 10: Historic Enrollment at McKinley High School

Year	Number of Students
1975	2,500
1976	2,401
1977	2,388
1978	2,383
1979	2,339
1980	2,245

Source: Charles R. Sutton & Associates, 1981, Table 2.

To deal with the then projected increase in enrollment, the plan recommended specific actions as follows:

- **Academic Core.**

The master plan calls for the renovation and restoration of Building A and the construction of a new library (which was under construction at the time of plan preparation in 1981) with adequate area for the temporary assignment of space for classrooms and administration. The total area for this element was estimated at 27,000 square feet.

- **Physical Education Core.**

The plan groups PE activities around the gym and playing field area, adds new classrooms and additional and improved locker room facilities, new courts and provides for a new competitive swimming pool.

- **Industrial Arts Core.**

The plan provides for construction of a new Shops and Industrial Arts Building in the parking lot near the existing shops.

In addition, there were proposed landscape improvements and parking space increases.

This study finds that the proposed Hale Kewalo is not expected to negatively impact the expansion plans of McKinley High School for the following reasons:

1. These improvements were planned totally within the existing boundaries of McKinley High School. The project site was specifically excluded from the proposed master plan; hence, it will not prohibit or deter implementation of the school's master plan.
2. The proposed project includes conveying Building 857 to the DOE for educational purposes. This will have a positive impact on the expansion of McKinley High School. Building 857 encompasses approximately 40,000 square feet. It would be sufficient to meet projected space needs as set forth by McKinley High School. In the expansion plans for McKinley High School, the new Academic Core building would need to include almost 27,000 square feet.

Building 857 could fill the need for the new Academic Core building. If the new building is built as planned, Building 857 would greatly exceed the projected space needs.

It is noted that the need for school expansion appears to be less crucial than estimated in the 1981 plan. In 1975, enrollment at McKinley High School exceeded the current enrollment by over 500 students. Further, the numbers seem to be steadily declining.

4.5 Impacts on Public Services and Facilities

4.5.1 Police Protection

The project site is in Police Beat 54 of Sector 7 in District 1. Beat 54 extends mauka-makai from King Street to Kapi'olani Boulevard. It runs east from Ward Avenue to Pi'ikoi Street. During an eight-hour shift, one officer is assigned to this beat. Crime problems in this area are characterized as follows:

- The violations in this area are generally minor. They range from loitering in the vacant buildings across from the project site to vagrants sleeping in parking structures.

- Most of the existing crime problems in this beat stem from McKinley High School. Truancy is a problem, as well as a youth gang. One group is known for monitoring the adjacent NBC parking structure for vehicles parked there all day. They have been burglarizing such vehicles if the opportunity arises.
- Illegal parking in this area is also a problem, particularly when the Neal Blaisdell Center and McKinley High School have simultaneous functions.

The project will increase the resident population in this area and therefore increase the need for police protection. This increase is not expected to be significant, however; nor is it expected to exacerbate existing crime problems in the area.²³

4.5.2 Fire Protection

The Pawa Fire Station, which has an engine and ladder company, responds to a first alarm at the project site; the Pawa station is located within the Study Area on Makaloa Street. Secondary response would come from the Kakaako Fire Station, an engine company located in the Study Area on South Street. There are currently no planned improvements to coverage of the area at this time.²⁴

Hale Kewalo will increase the need for fire protection services, but is not expected to significantly impact the delivery of services.

4.5.3 Schools

The schools which would be impacted by increased enrollment due to Hale Kewalo are Kaahumanu Elementary (located at the corner of Pensacola and Beretania Street), Central Intermediate (located in Downtown) and McKinley High School. The existing enrollments at these schools are presented in Table 11.

Hale Kewalo is expected to add approximately 108 students to these schools. Kaahumanu Elementary School, which is currently at capacity, would be the most significantly impacted by the addition of 72 students. The other schools appear to have sufficient capacity to handle the project's projected number of students.

²³ Based primarily on telephone communication with Darrel Lumlee, Beat Officer with the Honolulu Police Department, March 1, 1993.

²⁴ Telephone communication with Captain John Clark, Administrative Services, Honolulu Fire Department, February 26, 1993.

Table 11: Enrollment and Capacity Information on Schools Impacted by Hale Kewalo

School (Grades)	1993-1994 Enrollment (1)	Facility Capacity (2)	Remaining Capacity	Estimated Project Increase (3)
Kaahumanu Elementary (K through 5)	704	745	41	72 students
Central Intermediate (6 through 8)	522	915	393	9students
McKinley High (9 through 12)	1,972	2,094	122	27students

Sources:

(1) Telephone communication with Tom Saka, Demographics Specialist, State Department of Education, March 8, 1993.

(2) Telephone communication with Alan Honma, Facilities Branch, DOE, March 15, 1993.

(3) Based on per housing unit factors of 0.16 elementary school students, .02 intermediate school students, and .06 high school students, as provided by the State Department of Education to HCDA on February 10, 1993.

The potential for stressing public school facilities is an impact which extends well beyond the proposed Hale Kewalo project. Housing development is an imminent part of the redevelopment efforts of Kaka'ako, and the proposed projects in Ke'eaumoku and Pawa'a neighborhoods will further stress the schools in this district.

The inevitable development of affordable housing will particularly increase the need for public school facilities. It is estimated that, in affordable housing projects, 16 students will be generated by 100 units. This is high compared to market units, where 100 units are expected to generate only one public school student. This difference in demand is attributable to (1) the tendency for buyers of market users to be older and thus have fewer school-aged children and (2) the ability of market housing residents to afford private school education.²⁵

²⁵ Telephone communication with Tom Saka, Demographics Specialist, State Department of Education, March 8, 1993

The State Department of Education (DOE) is charged with the responsibility of planning "facilities that reflect program and demographic requirements as well as opportunities for their multiple uses."²⁶ Given the major growth anticipated in Kaka'ako, as well as in the nearby Ke'eaumoku and Pawa'a area, it is necessary that the DOE have a comprehensive plan to address the needs of the growing population.

There is currently a proposed program to increase Capital Improvement Program (CIP) resources throughout the overall DOE system. This plan estimates that there is a current shortage of 700 classrooms, and the shortage will increase to approximately 1,340 classrooms by 2002. The strategy to increase CIP resources included adding to present funding levels; reducing CIP design and construction costs; adjusting existing program guidelines, and maximizing the use of existing facilities.²⁷

The program does not identify locations for the new facilities, however, nor does it recommend any specific operational changes. The only new facility actively being planned in this area is in conjunction with the Pawa'a redevelopment; the project is to accommodate grades kindergarten through two on-site. As previously discussed, there is a master plan for the expansion of McKinley High School, but the status of this plan is unknown.

There is no regional assessment of educational impacts due to anticipated growth; hence the magnitude of enrollment increase in the region is unknown. Without this information, it is difficult to formulate a plan for accommodating the planned growth in the Study Area. Such a comprehensive plan is needed regardless of the status of Hale Kewalo so that each of the proposed residential projects can be reviewed within the context of a regional educational plan, rather than on a case-by-case basis.

4.5.4 Parks and Recreation

The Study Area currently has limited public recreational resources which are intended specifically for neighborhood residents. At present, the only parks serving Study Area residents are Ala Moana Park (76 acres), Kakaako Waterfront Park (30 acres), Sheridan Park (1.7 acres), Mother Waldron Playground (1.8 acres). The first two parks are district and regional parks and are designed to serve

²⁶ *Hawai'i State Department of Education, 1992, page 1.*

²⁷ *Ibid., page 8.*

more than the residents who live nearby. Study Area residents must therefore compete with islandwide residents to use these resources.

Hale Kewalo will increase the open space resources by adding 1.75 acres to the inventory. This will provide the community and on-site residents and workers with a place for relaxation and recreation. Almost 36,000 square feet of additional recreational space will be provided on the level above the parking deck. This area will contain a tot lot, an exercise area, barbeque facilities recreation/meeting rooms, basketball and volleyball courts, and a trellised and grassed area for passive recreation.

While the on-site recreational and open space areas will meet the needs of Hale Kewalo residents to a large degree, off-site recreational needs also need to be met. Section 3 outlined a number of recreational facilities called for in the Mauka Area Plan. In addition to the public facilities, other opportunities for parks include recreation within private developments and through park dedication. To date, there are 48.27 acres of existing and proposed private and public recreational space for the Mauka Area.

The original Kakaako Community District Plan proposed 75 acres of recreation to meet the requirements of the future population. Currently, HCDA is undergoing a comprehensive amendment program. One recreational possibility currently being considered is the location of major field activities in the second phase of the Waterfront Park and the establishment of a facility-oriented guidance policy for the Mauka Area.

A Recreational Facility Plan is anticipated to be the basis for future park programming in Kaka'ako. This plan will contain a set of recreational facilities from which plan administrators and developers can choose for public facilities dedication purposes and park space programming.

Section 5. Preliminary Community Issues Related to Hale Kewalo

Social impacts are project effects which are anticipated to occur given available information and evidence. Community issues, on the other hand, are people's reactions to community events, changes and problems. Issues change over time, as people's priorities and values change. Community issues represent opinion. Because of the variability of public opinion, it is important to realize that *community issues do not represent actual occurrence of impact.*

This section presents an overview and analysis of issues related to Hale Kewalo as of March 1993. These issues may change depending on any project modifications and how the community's priorities may evolve.

Section 5.1 identifies the sources of information used in this analysis. Section 5.2 provides an overview of project issues and community positions to date. Section 5.3 identifies and analyzes major project-related issues current at the time of this writing.

5.1 Sources of Information

The issues analysis is based on our research of the following sources:

- **Responses to the Draft Environmental Assessment.**
Several letters were sent to the Housing Finance and Development Corporation in response to the Environmental Assessment for Hale Kewalo. These letters were generated around September and October 1992 and were sent by McKinley High School administrators, students, parents and various organizations, legislators, and by public agencies.
- **Responses to the EIS Preparation Notice (EISPN).**
Many people and agencies responded to the EISPN published early this year. The responses were mostly generated in February 1993.
- **Complaint for Declaratory Judgment and Injunctive Relief.**

In December 1992, McKinley High School Parent, Teacher and Student Association (PTSA), certain legislative representatives and several individuals filed a complaint in Hawai'i Circuit Court on this project.

- **Media articles and miscellaneous material.**

The Hale Kewalo project has elicited strong community reaction and the newspapers have been covering highlights for almost a year. The McKinley PTSA and related groups, in lobbying for their position, have distributed fliers in public gathering places. Further, we included any project files which would be helpful in providing project background and indicating project-related issues.

Appendix A contains the correspondence reviewed in this report. News articles are identified in the Reference section.

5.2 Overview of Project-Related Issues and Positions

5.2.1 Summary of Community Issues on Hale Kewalo

Hale Kewalo has elicited strong community opposition from people related to McKinley High School or who are sympathetic to the school's position. The basic issue is that McKinley High School wants the property for its own expansion needs or for otherwise solely educational purposes. Project opponents have argued that the school's expansion and DOE's facility needs outweigh the needs for affordable housing and faculty housing in this location.

Project opponents point out that this is not a "housing versus education" issue. Many have expressed support for the project concept, but feel that there are alternative sites for faculty and affordable housing. Suggested alternative sites have included the "Block J site" in Downtown, properties adjacent to the UH Quarry and the property currently occupied by University Lab School; the latter two are part of the UH Manoa campus.

Other issues are related to the potential incompatibility between the proposed residential uses and the school-related and public activities. Further concerns include the increased noise and traffic around the school during construction and over the long-term time frame. The possible degradation of McKinley as a resource cited by the State and National Register of Historic Sites is also of major concern.

Another issue revolves around the appropriateness of the proposed faculty housing. There was concern that public funds should not be used to house professors with "above average" incomes; another concern is that proposed units are not consistent with those recommended in the UH master plan for faculty housing.

All of these issues are discussed in more detail and analyzed in Section 5.3.

5.2.2 Positions

- **UH Professional Assembly and UH administration.**

Public support for the project can be inferred through the actions of elected representatives who voted to fund the Hale Kewalo project. Vocal support for the project stems primarily from the UH Professional Assembly and the UH administration. Supporters cite Hawai'i's high cost of housing as a major deterrent to recruiting qualified personnel who live outside Hawai'i. They have testified that UH needs to offer affordable housing to remain competitive in recruiting qualified faculty from outside Hawai'i.²⁸

- **Save McKinley Coalition, including its member organizations and individuals.**

Major project opponents include the McKinley administration, faculty and staff, McKinley High School Student Council, the McKinley Parent-Teacher-Student Association (PTSA) and Hawaii State PTSA, the McKinley High School Alumni Association, and private citizens. These groups, including the overall student body, have organized into the Save McKinley Coalition.

The Coalition has have lobbied for their positions in many forums. Members have taken their cause to the general public by circulating fliers and petitions in shopping centers and at public gatherings. There are reportedly 11,000 signatures on these petitions. At the State Capitol, the artwork on some of the temporary construction panels advocate the retention of the project site for educational activities.

²⁸ Morse, 1992.

Project opponents have also lobbied the State Legislature. In last year's legislative session, public hearings were held on House Resolution 182 and House Concurrent Resolution 170. These resolutions were designed to oppose the development of the proposed project. During that period, project opponents vigorously lobbied on behalf of those resolutions. It is noted that those opposed to the project have affirmed their support of the concept of affordable housing; they do not believe that the proposed siting is appropriate.

- **Board of Education and Department of Education**

Those opposed to the project have also attempted to solicit support from the State Board of Education (BOE). At the time of this writing, however, the BOE has not taken a formal position of objection or complaint. The following discussion provides an overview of BOE actions on this project.

In January 1992, the BOE initially agreed to accept Building 857 and 50 parking stalls on the project site. This action was in concurrence with a recommendation by the BOE Adult Education Committee.²⁹ The Board felt that it had initially made the agreement in the belief that the DOE was the beneficiary of UH largesse.

In May, however, BOE members voted to reverse that action. Board members were concerned that the previous agreement was indicative to UH and HCDA that DOE was willing to give up its potential interest in the remaining portion of the 5.3 acre site. BOE thus chose to claim control over the entire site.³⁰

The Governor signed Executive Order No.3567 on August 31, 1992. This Executive Order essentially set aside the project site for housing and other purposes set forth in HCDA's mandates. The Order further states that if the parcel is not used as such, then the control of the land will revert to the UH.

²⁹ Memo dated 8 July 1991 from Karen Knudsen, Chair of the BOE Adult Education Committee to Dr. Mitsugi Nakashima, Chair of the Board of Education.

³⁰ Letter dated 22 May 1992 from Mitsugi Nakashima, M.D., Chair of the Board of Education to William Paty, Chair of the Board of Land and Natural Resources

Subsequently, the BOE decided not to take formal action on the proposal, citing that the Board has no formal mechanism to fight the project. In November 1992, the BOE noted that the project site is controlled by HCDA and UH. Further, the State Attorney General's office had recently stated it would not represent the BOE in a dispute with the State.³¹

Additional evidence of BOE's formal position of neutrality was its reaction to a request by the Save McKinley Coalition to participate in a legal complaint against the project. In a December Board meeting, the BOE chose to not be actively involved in this effort.³²

At the departmental level, the DOE Superintendent initially signed a memorandum with HCDA which would grant the DOE rights to Building 857 and use of 50 parking stalls at the proposed site.³³ Later, however, the DOE Superintendent stated that "DOE opposes the development because we have not given prior written approval to withdraw the land from Executive Order No. 101 for McKinley High."³⁴

Most recently, in response to the EISPN, the DOE listed several concerns about the project, the most notable being the need for available sites for school development, given the current capacities and planned development. No position regarding support or opposition was explicit, although the Superintendent felt that the no-action alternative or the alternative uses options were preferable to this project. He further noted that DOE plans will become more definite as plans in Kaka'ako become so.³⁵

- **Complaint For Declaratory Judgement and Injunctive Relief filed in First Circuit Court**

Those opposing the project took their efforts to court. On December 6, 1992, Fujiyama, Duffy & Fujiyama filed a Complaint For Declaratory Judgement and Injunctive Relief filed in First Circuit Court. The plaintiffs included PTSA members, students, alumni, residents near the property,

³¹ Thompson, 1992; Infante, 1992; Adamski, 1992; Oshiro, 1992

³² Oshiro, 1992. Note that the BOE meeting minutes were not available at the time of this writing.

³³ Yamaguchi, 1992b.

³⁴ Letter dated 4 September 1992 from DOE Superintendent Charles T. Toguchi to Harold Edwards, Project Coordinator at the Housing Finance and Development Corporation.

³⁵ Letter dated 10 February 1993 from DOE Superintendent Charles T. Toguchi to Joseph K. Conant, Executive Director at the Housing Finance and Development Corporation

parents in behalf of the children in the McKinley High School catchment district, and staff members of McKinley. Also, six State Representatives were among the plaintiffs; the BOE was not party to this effort. The complaint was filed against HCDA, HFDC, and UH.³⁶

At issue in the Complaint is the alleged inadequacy of the Draft Environmental Assessment circulated before October 1992, and the Negative Declaration by the Defendants HCDA, HFDC and UH. Included as exhibits are various correspondence from public agencies and individuals which cite reasons supporting the need for an EIS. The two Counts cited in the Complaint are summarized as follows:

Count I: Declaratory Judgement that an Environment Impact Statement is required: The Plaintiffs claim to be aggrieved parties with respect to the Defendants' Negative Declaration on the Environmental Assessment by virtue of the fact the requests for an EIS have been denied by the Defendants. The major reasons which supported the need for an EIS included the need for school sites because of planned development, the need to obtain a water allocation from the State Department of Land and Natural Resources, and the project's effect on traffic, parking, aesthetics and views. The Plaintiffs requested a judgment declaring that the Defendants are required to prepare an EIS on this project.

Count II - Injunctive Relief: The Plaintiffs requested that the Defendants not proceed any further until they have prepared an EIS.

The action requested in the complaint is no longer of issue. Since the filing of the complaint, the State initiated the EIS process which includes this study. Hence, the various parties will have an opportunity to review and comment on project impacts as afforded in Chapter 343, HRS.

- **Neighborhood Boards**

The project site is in the Ala Moana/Kakaako Neighborhood Board No. 11 area. That Board has not taken a formal position on this project. As early as April 1991, the Board was apprised of potential activity on the project site. At that time, there was a discussion that the project site was being considered for a cluster-type temporary housing. The Chair noted that this

³⁶ *Fujiyama, Duffy & Fujiyama, 1992.*

site was not under consideration for that use; rather the "KCC site" may be reviewed as a location for University of Hawaii faculty housing or other joint City and State projects.³⁷

In July 1991, HCDA informed this Neighborhood Board of a joint HCDA and UH project. A more detailed presentation was made in February 1992. HCDA presented basically the same proposal as the subject of this social impact assessment. The Board moved to request that funding for the Hale Kewalo project be delayed until a public hearing is held to determine the appropriateness of the project. The motion failed.³⁸ This Board has not responded to the environmental assessment or the EISPN.

The Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10 recently responded to the EISPN. The Board points out that McKinley High School is the "only State land that is available for educational use within the Honolulu business area . . . With increased student population in and outside the school's boundary, the school facilities will need to be expanded."³⁹

5.3 Analysis of Major Issues Related to Hale Kewalo

5.3.1 Competition between the Proposed Project and Educational Needs

The strong community opposition to this project stems from a belief that control of the project site should revert back to the State Department of Education. Project opponents cite the already over-loaded facilities at McKinley High School with 35 students per classroom. They also cite the Kaahumanu Elementary School, which is a feeder school to McKinley High School and which is operating at maximum capacity, as evidence.

³⁷ City and County of Honolulu Neighborhood Commission, Minutes to the April 1991 meeting of the Ala Moana/Kakaako Neighborhood Board No. 11.

³⁸ City and County of Honolulu Neighborhood Commission, Minutes to the February 1992 meeting of the Ala Moana/Kakaako Neighborhood Board No. 11.

³⁹ Letter dated 22 February 1993 from John Steelquist, Chair of the Makiki/Lower Punchbowl/Tantalus Neighborhood Board to the Housing Finance and Development Corporation.

It is often pointed out that current plans suggest a significant increase in need for public educational facilities. The Kaka'ako Community Development District is being planned for major revitalization, and the projects outside Kaka'ako, such as the Pawa'a redevelopment proposal, will further exacerbate the need for school facilities.

Whereas the departmental and BOE positions are based on policy and planning needs, school administrators, students and parents have specific desires for the future of this site. Currently Building 857 is used for McKinley High School Adult Education activities, the Young Parents program and as the relocation site for ten classrooms displaced by the renovation of Building A. Those who want McKinley High School to control the project site envision the site for temporary classrooms while Building A is reconstructed; for other McKinley programs and classes; for the development of elementary schools which may be needed in the future; and for a child care facility for the Young Parents Program. Currently, the program's nursery is located three blocks away from McKinley High School.

Consistent with the belief that the project site should be used for educational purposes is the questioning of the appropriateness of Executive Order (EO) 3567. Some project opponents assert that EO 3567 does not supercede EO 101 which essentially gives control of the project site to McKinley High School. Project opponents assert that EO 22 transferred public technical programs, which included Kapiolani Technical School, from the Department of Education to the University of Hawaii, and that this transfer did not include the land title. It is alleged that McKinley High School still has control over the land. No legal challenge on this issue has been made.

Analysis:

As noted in Section 5.2, the BOE has taken several positions on the project, with the most recent being one of neutrality. The DOE has also expressed strong concerns about the project, and expresses a preference for other alternatives, but does not explicitly oppose the project.

Hence, at the present time, the most intense concern about the project's effect on the expansion of McKinley High School comes at the grass roots level. The impetus for active opposition is mostly localized (as opposed to regional or islandwide); school administrators, teachers, students, parents and some legislators have actively sought support for their position.

Essentially, they believe that *Hale Kewalo* will take away what already belongs to -- or should rightfully belong to -- DOE and McKinley High School High School. There has been an assumption that control of the site would eventually revert to DOE and hence McKinley High School. Another assumption is that McKinley High School or DOE already has plans for the site, and that this project will prohibit implementation. A further assumption is that the site is needed for future needs, given the growth of the area.

These assumptions may be the basis for the prevailing sentiment, but some of the premises are inaccurate, as follows:

1. As discussed in Section 4.4.4, the expansion plan for McKinley High was based on the assumption that project site would not be available. Hence, the project site was never formally included in plans to expand the high school.
2. Building 857, which encompasses approximately 40,000 square feet, would be sufficient to meet projected needs as set forth by McKinley High School. In the expansion plans for McKinley High School, there is a proposal to add another academic building between Building A and the cafeteria. This new building would include almost 27,000 square feet. If the new building is built as planned, Building 857 would greatly exceed the projected space needs. Even if the new building were not constructed, Building 857 would be sufficient for projected space needs.
3. It is often stated that the project proponents, particularly HCDA, should reserve the project site for future educational needs given the growth in the area. Although the site is in the Mauka Area Plan as a potential site for educational uses, there are no specific plans for using the site in that manner. Further, creating such a plan is not the responsibility of UH or HCDA. This responsibility lies with the DOE. The growth of Kaka'ako has been planned since the late 1970s, and the 1990 Mauka Area Plan provides even more specific direction on how the area will be revitalized. There are also other projects in the area, such as the Pawa'a redevelopment, which

signal the need for expanded and new school facilities. DOE is responsible to meet the educational needs of the community. As of yet, however, the department has not projected the impacts of this widely-anticipated growth; hence, there is no plan to address these impacts.

Regarding the appropriateness of the EO 3567, there has been no formal legal challenge. It is our understanding that this Executive Order is currently in effect and superceded previous Orders relative to this site.

5.3.2 School - Resident Compatibility

A common project-related issue is that Hale Kewalo residents will complain about normal school activities. School officials, teachers, parents and students are concerned that complaints will be generated by athletic practice field use, band practice, homecoming float construction and cheerleader practice. At the root of this concern is that resident complaint will eventually cause changes, and possibly the termination of, many activities which the school presently undertakes.

Analysis:

Although this concern is justified because there is already precedence in other areas whereby resident complaints resulted changes in school activities, it does not mean that such impact on the school and public activity will actually occur. As discussed in Section 4.4, the current noise regulations exempt schools from 7 A.M. to 10 P.M and schools are not required to mitigate noise during this periods. In the previous cases at other schools, the school officials decided to curtail or modify their activities. McKinley High School officials will have the option of doing the same, but they could choose to keep their activities the same if they wish. Non-school activities and gatherings continuing after 10 P.M. are not exempt from the noise regulations. These only occur a few times a year, however, and can be handled on a case-by-case basis.

5.3.3 Construction Impacts

There is concern that the construction of the proposed facility will create vibrations, noise and ambient dust incompatible with the educational process. The concern involves the student health and learning environment, and extends to physical effects on Building A. People are afraid that students will be negatively affected by the disruption of pile driving activities, excessive dust and noise.

Further, Building A has numerous structural problems, and some have expressed concern that vibration-causing construction activities will harm this historic resource.

A related issue is parking during construction. During construction, all on-site parking will be terminated. There is concern that this will negatively impact those who park on-site now. A related issue is that competition for street parking, which is already at a premium in the area, will increase due to construction workers.

Analysis:

The project developer will need to make every effort to mitigate construction-related vibration, noise and dust impacts. More information regarding construction impacts is presented in the EIS.

While the temporary disruption of parking will negatively impact those who use the area now, the long-term addition of parking spaces is positive.

5.3.4 Historic and Visual Impacts

Some people are concerned that the project's high-rise development is inconsistent with existing adjacent uses. They feel that the existing low-rise character of the Neal Blaisdell Center/McKinley High School block will be negatively impacted by the proposed tall structures because of the difference in appearance and character.

Further, there is concern that project will negatively impact the historic character of McKinley High School, a portion of which is recognized as a State and Federal Historic Register site. The proximity of Hale Kewalo to this historic resource is suspected to have a negative impact because it will alter the character of the resource itself.

Analysis:

As discussed in Section 4.3.3, the project will alter the character of the Neal Blaisdell Center/McKinley High School block by introducing high-rises next to low-rise buildings. It was further found, however, that while Hale Kewalo will bring high-rises closer to the low-rise buildings, the project will not introduce a new element in the area. Tall buildings are

expected to be on three sides of the Neal Blaisdell Center/McKinley High School block. Hale Kewalo will therefore not be the only prominent element in either the mauka - makai viewplane or the 'ewa-Diamond Head viewplane. These viewplanes will be altered regardless of whether Hale Kewalo is built.

It is noted that the project is consistent with HCDA's view corridor requirements. The project meets setback requirements and will retain the Pensacola Street and Kapi'olani Boulevard view corridors.

Regarding the effect on the adjacent historic resource, the State Historic Sites Preservation Division has found that the project will not negatively impact that aspect of McKinley High School.

5.3.5 Appropriateness of Faculty Housing Component

The faculty housing component has been criticized from three perspectives. First, some project critics feel that public monies should not be used to subsidize housing for college professors with "above-average incomes." They prefer that monies be used to benefit or fund other efforts instead.

Second, the site's location has been criticized because of the distance from the UH Manoa campus. Third, it has been noted that the size of proposed units and related amenities are inconsistent with the UH long-range master plan for faculty housing.

Analysis:

The assumptions about income levels of on-site faculty residents are inaccurate. All of the future residents of Hale Kewalo -- including faculty members -- will need to meet affordability requirements, which are provided in Section 1 of this report. The majority of the units will be for people whose incomes are less than 80 percent of the median income. Thus, a proliferation of professors with above-average incomes will not be possible.

The project will serve faculty members of all of O'ahu's UH campuses, including the Manoa campus, Leeward Community College, Honolulu Community College and Kapiolani Community College. Though the project site is not adjacent to the Manoa campus, it is in proximity to major buslines and thoroughfares which can be used to these various job sites.

The faculty housing program is not confined to the Hale Kewalo project and one needs to review the project's role within the entire context. The Manoa housing project will include the larger two- and three-bedroom units as called for in the UH recommendations. It is expected to house families, with schools and other facilities nearby. Hale Kewalo will contain the smaller units designed for single or recently-married faculty members who need affordable housing.

5.3.6 Impact on Non-educational Public Facilities and Services

There were also community concerns regarding the project's direct and cumulative effects on public facilities and infrastructure. It was pointed out that the area needs more parks, especially in light of planned growth; the addition of Hale Kewalo residents is expected to further exacerbate that need. Similar concerns were expressed about police and fire protection services.

Traffic and parking were also major issues. It was felt that the project will add too many cars to the immediate vicinity, and that there will be continued and increased competition for parking spaces. There were also suggestions that careful study be made of the site's geology because of possible high water tables.

Analysis:

As discussed in Section 4.5.4, the planned growth in Kaka'ako and the adjacent areas will require much more open and recreational areas than are currently available. To date, there are over 48 acres of existing and proposed public recreational space for Kaka'ako's Mauka Area. The project will increase recreational and open space resources by adding 1.75 acres to the regional inventory. HCDA is exploring amendments to the Mauka Area plan regarding recreational facilities. HCDA is in the process of developing a Recreational Facility Plan which would provide a basis for future park programming and would create a "template" of recreational facilities which may be appropriate in the area.

Section 4.5 discusses impacts on police and fire protection. The EIS contains discussions on traffic, parking and environmental impacts.

References for Hale Kewalo Social Impact Assessment

Adamski, Mary. *School board sidesteps near-Mckinley housing issue.* Honolulu Star-Bulletin. Honolulu, Hawai'i, November 13, 1992.

Ashizawa, Becky. *New McKinley towers fight launched.* Honolulu Star-Bulletin. Honolulu, Hawai'i. August 20, 1992.

Catterall, Lee. *UH housing plan gets bad reception.* Honolulu Star-Bulletin. Honolulu, Hawai'i. February 24, 1992.

Chun, Mike G.H. *Can condos on campus tame the McKinley tiger?* (Letter to Editor). Honolulu Star-Bulletin. Honolulu, Hawai'i. June 9, 1992.

Chun, Mike G.H. *Housing, high schools aren't good neighbors* (Letter to Editor). Honolulu Star-Bulletin. Honolulu, Hawai'i. August 1, 1992.

Chun, Mike G.H. *Letter to Editor. We need a public hearing to decide fate of McKinley.* Honolulu Advertiser. Honolulu, Hawai'i. November 17, 1992.

City and County of Honolulu Department of General Planning. *Development Plan Status Review: Status Fiscal Year 1991, September 1991.* Produced in 1992.

City and County of Honolulu Department of Land Utilization. *Land Use Ordinance.* Honolulu Hawai'i. December, 1991.

Daysong, Rick. *Honolulu apartment rents top nation.* Honolulu Star-Bulletin. March 6, 1993.

Earthplan. *Pawa'a Redevelopment Social Impact Assessment.* Prepared for the City Department of Housing and Community Development.

Dayton, Kevin. *Kakaako's agency OKs two towers.* Honolulu Advertiser. Honolulu, Hawai'i. June 7, 1992.

- Fujiyama, Duffy, & Fujiyama, Attorneys for McKinley High School Parent, Teacher and Student Association, etal. *Complaint for Declaratory Judgment and Injunctive Relief; Exhibits "A" to "I" Demand for Jury Trial; Summons.* Filed on December 8, 1992.
- Glauberman, Stu. *Waihee hears McKinley tower protest.* Honolulu Advertiser. Honolulu, Hawaii. August 20, 1992.
- Hawaii Community Development Authority. *Mauka Area Plan.* Kakaako Community Development District. Honolulu, Hawai'i. February 1990.
- Hawaii State Department of Education. *Action Planning for School Facilities: A Proposal to the Board of Education.* December 1992.
- Hawai'i State Housing Finance and Development Corporation and Office of State Planning. *Report to the Legislature on H.C.R. 133, HD, SD1. Requesting the Housing Finance and Development Corporation to examine the Feasibility of Constructing Affordable Housing on Parcels of State Land Within Honolulu's Primary Urban Center.* Honolulu, Hawai'i. January, 1991
- Hiura, Arnold. *Housing vs. Education?* The Hawai'i Herald. March 6, 1992.
- Infante, Esme M. *UH ownership of KCC site in doubt.* Honolulu Advertiser. Honolulu, Hawai'i. July 11, 1991.
- Infante, Esme M. *School board can't say no to project.* Honolulu Advertiser. Honolulu, Hawai'i. November 13, 1992.
- Kambis, Jacob. *Imperial Plaza sells well.* Pacific Business News. Honolulu, Hawai'i. March 2, 1992.
- Kaser, Thomas. *UH regents OK Pensacola development.* Honolulu Advertiser. Honolulu, Hawai'i. July 20, 1991.
- Kaser, Thomas. *PTSA suit fights high-rise plans at Pensacola Street.* Honolulu Advertiser. Honolulu, Hawai'i. December 9, 1992.
- KPMG Peat Marwick. *University of Hawaii Faculty Housing Assistance Master Plan. Volumes 1 and 2.* January 1991.

- Morse, Harold. *House panel rejects UH faculty housing proposal*. Honolulu Star-Bulletin. Honolulu, Hawai'i. April 3, 1992.
- Oshiro, David. *McKinley fan seeks to bar housing on ex-KCC site*. Honolulu Star-Bulletin. Honolulu, Hawai'i. November 6, 1992.
- Oshiro, David. *Housing foes don't win over DOE*. Honolulu Star-Bulletin. Honolulu, Hawai'i. December 11, 1992.
- Rodrigo, Christine. *Dealer wants lot back*. Pacific Business News. Honolulu, Hawai'i. March 16, 1992.
- Sakamoto, Richard S. *Letter to Editor. Housing project would hurt McKinley students*. Honolulu Star-Bulletin. Honolulu, Hawai'i. August 7, 1992.
- Staff. *Majestic Plaza*. Honolulu Star-Bulletin. Honolulu, Hawai'i. March 12, 1991.
- Staff. *Myers moves on Kakaako residential development*. Pacific Business News-Focus Report. Honolulu, Hawai'i. June 29, 1992.
- Staff. *Kakaako units built for senior citizens*. Honolulu Star-Bulletin. Honolulu, Hawai'i. July 4, 1992.
- Staff. *Kakaako project for elderly looking for applicants*. Honolulu Star-Bulletin. Honolulu, Hawai'i. 1992.
- Charles R. Sutton and Associates, Inc. *McKinley High School Campus Development Report*. Prepared for the State Department of Accounting and General Services. March 1981.
- Tangonan, Shannon. *McKinley towers are opposed by House committee*. Honolulu Advertiser. Honolulu, Hawai'i. April 6, 1992.
- Tangonan, Shannon. *City, State tussle over Block J*. Honolulu Star-Bulletin & Advertiser. Honolulu, Hawai'i. April 29, 1992.
- Tanahara, Chris. *McKinley group opposes twin tower plan*. Honolulu Advertiser. Honolulu, Hawai'i. February 24, 1992.

Thompson, Michelle R. *Myers unveils Symphony Park.* Pacific Business News. March 2, 1992.

Thompson, Michelle R. *Myers basing affordables on King St. Cemetery swap.* Pacific Business News. Honolulu, Hawai'i. March 9, 1992.

Thompson, Rod. *School board retakes UH faculty land.* Honolulu Star-Bulletin. Honolulu, Hawai'i. May 22, 1992.

Tune, Jerry. *Kakaako land awaiting anxious developer.* Honolulu Star-Bulletin & Advertiser. Honolulu, Hawaii. May 31, 1992.

U.S. Department of Commerce, Bureau of the Census. *Census of Population and Housing, 1990 Summary Tape File 1-A, Hawaii.* Washington D.C. 1991.

U.S. Department of Commerce, Bureau of the Census. *Census of Population and Housing, 1990 Summary Tape File 3-A, Hawaii.* Washington D.C. 1992.

Watanabe, June. *Face lift in works for exhibition hall.* Honolulu Star-Bulletin. Honolulu Hawaii. November 24, 1992.

Yamaguchi, Andy. *Condol/cemetery deal gets gold star for innovation.* Honolulu Advertiser. Honolulu, Hawai'i. 1992a.

Yamaguchi, Andy. *School chief backs off KCC flap.* Honolulu Advertiser. Honolulu, Hawai'i. February 28, 1992b.

Appendix A: List of Correspondence Reviewed for the Issues Analysis

Community Correspondence

Name	Affiliation	Date of Correspondence
Cayetano, Avis	McKinley Student	February 19, 1993
Cheong, Corrina	McKinley Student	February 16, 1993
Dilayo, Renee	McKinley Student	February 12, 1993
Gamata, Erlindo	McKinley Student	February 20, 1993
Gay, Rory M.	Archaeologist	September 20, 1992
Hagino, David M.	State Representative	September 22, 1992
Hiraki, Kenneth	State Representative	September 22, 1992
Hirono, Mazie	State Representative	September 22, 1992
Ishikawa, Joy	McKinley Student	February 17, 1993
Kadooka, Paul	President, McKinley PTSA	September 22, 1992
Hamamoto, Patricia, etal.	Principal, McKinley	February 22, 1993
Kimura, Amy		February 22, 1993
Lee, Vanessa	1st Vice President, McKinley Student Council	February 19, 1993
Palakiko - Hinch, Dan-regis	McKinley Student	February 22, 1993
Save McKinley Coalition (flier)	McKinley High School Faculty and Staff McKinley High School PTSA McKinley High School McKinley High School Hawaii State PTSA And Other Individual Supporters	No Date
Steelquist, John	Chair, Neighborhood Board # 10	February 10, 1993

Community Correspondence

Name	Affiliation	Date of Correspondence
Syles, Gaile A.	Save Mckinley Coalition	September 21, 1992
Sykes, Gaile A.	McKinley Teacher, Coach	October 27, 1992 February 20, 1993
Tam, Rod	State Representative	September 22, 1992
Twenty-two Teachers	Teachers of McKinley High School	February 19, 1993
Theilen, Cynthia	State Representative	September 21, 1992 February 22, 1993
Yamashita, Chantal	McKinley Student	February 21, 1993

State of Hawai'i Agencies

Agency Name	Date of Correspondence
Department of Accounting and General Services	September 15, 1992
Department of Business & Economic Development & Tourism	September 23, 1992
Department of Education	June 5, 1992 September 4, 1992 February 10, 1993
Board of Education	July 8, 1991 May 22, 1992
Department of Health	October 22, 1992
Department of Land and Natural Resources	September 18, 1992
Board of Land and Natural Resources	September 23, 1992
Department of Transportation	September 22, 1992

State of Hawai'i Agencies

Agency Name	Date of Correspondence
Office of Environmental Quality Control	August 25, 1992

City and County of Honolulu Agencies

Agency Name	Date of Correspondence
Board of Water Supply	September 30, 1992
Department of General Planning	October 2, 1992
Department of Housing and Community Development	September 18, 1992
Department of Land Utilization	September 25, 1992
Department of Parks and Recreation	October 27, 1992
Department of Public Works	September 16, 1992
Department of Transportation Services	September 25, 1992
Police Department	September 14, 1992