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

Accepting Authority: Governor John D. Waihee
State of Hawaii

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

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

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

<table>
<thead>
<tr>
<th>Figure Number</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>LOCATION MAP</td>
<td>I-3</td>
</tr>
<tr>
<td>II</td>
<td>PROPOSED DEVELOPMENT SITE PLAN</td>
<td>I-4</td>
</tr>
<tr>
<td>III</td>
<td>ELEVATION VIEWS</td>
<td>I-5, I-6</td>
</tr>
<tr>
<td>IV</td>
<td>FIRM</td>
<td>II-3</td>
</tr>
<tr>
<td>V</td>
<td>NATIONAL AND STATE HISTORIC REGISTER SITE</td>
<td>II-5</td>
</tr>
<tr>
<td>VI</td>
<td>VICINITY MAP</td>
<td>II-7</td>
</tr>
<tr>
<td>VII</td>
<td>ROADWAY SYSTEM</td>
<td>II-11</td>
</tr>
<tr>
<td>VIII</td>
<td>PHOTOGRAPHS OF THE PROJECT AREA</td>
<td>II-12, II-13</td>
</tr>
<tr>
<td>IX</td>
<td>SOCIAL IMPACT ASSESSMENT</td>
<td>III-2</td>
</tr>
<tr>
<td></td>
<td>SUB-AREAS OF KAKAAKO</td>
<td></td>
</tr>
<tr>
<td>X</td>
<td>KAKAAKO MAUKA AREA LAND USES MAP</td>
<td>IV-6</td>
</tr>
</tbody>
</table>
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.
Hale Kewalo
Rental Housing Mixed-Use Development

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

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.
Hale Kewalo  
Rental Housing Mixed-Use Development  
Final EIS

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
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
Hale Kewalo
Rental Housing Mixed-Use Development

Unresolved Issues:

affordable housing, higher education, education and recreation.

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. Gail A. Sykes
Ms. Amy Kimura
Hale Kewalo
Rental Housing Mixed-Use Development

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.
KAPIOLANI BLVD  AFFORDABLE HOUSING TOWER  ACCESS ROAD  E.T.C.  UH FACULTY TOWER

Source: ANBE, ARUGA & ISHIZU, ARCHITECTS, INC. • WALTER LEONG & ASSOCIATES
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 Kapilani 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
Fig. IV
FLOOD INSURANCE RATE MAP

Hale Kewalo Rental Housing
Mixed Use Development

LEGEND

Zone A  No base flood elevations determined
Zone AE  Base flood elevations determined
Zone X  Areas determined to be outside 500-Year flood plain
Hale Kewalo 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

Fig. V
NATIONAL & STATE HISTORIC REGISTER SITE
Hale Kewalo Rental Housing
Mixed Use Development

NOT TO SCALE
Source:
State Historic Preservation Division
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 mauka directions, the project site is bordered by two multi-lane thoroughfares, Pensacola Street and Kapilolani Boulevard, respectively.

Mauka-Diamond Head of the project site, across Pensacola Street, are primarily multi-family residential structures. In the Diamond Head direction an abandoned building presently planned for demolition and subsequent development of a mixed-use residential, commercial, and retail complex. Across Kapilolani Boulevard in the mauka 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.
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:

- **Sub-Area 1**
  
  This Sub-Area is bounded by Kalakaua Avenue on the Diamond Head side and Keeauumoku Street on the Ewa side. It runs mauka-makai from King Street to Kapiolani Boulevard and is coterminous with Census Tract 36.98.

- **Sub-Area 2**
  
  This Sub-Area is roughly rectangular in shape. It is bounded by Kapiolani Boulevard, Keeauumoku, King and Pensacola Streets and is coterminous with Census Tract 36.97.

- **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.

- **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
Hale Kewalo
Rental Housing Mixed-Use Development

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 toward 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.

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)g: 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
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.

<table>
<thead>
<tr>
<th>Kakaako Mauka Area Land Uses</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>FLOOR AREA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land Use</td>
<td>Existing (1980)</td>
<td>Mauka Area Plan (2015-20)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>million square feet</td>
<td>million square feet</td>
<td>percent</td>
</tr>
<tr>
<td>Commercial</td>
<td>2.8</td>
<td>13.7</td>
<td>38</td>
</tr>
<tr>
<td>Industrial</td>
<td>4.6</td>
<td>5.3</td>
<td>15</td>
</tr>
<tr>
<td>Residential</td>
<td>1.1</td>
<td>17.1</td>
<td>47</td>
</tr>
<tr>
<td>Total</td>
<td>8.5</td>
<td>36.1</td>
<td>100</td>
</tr>
</tbody>
</table>

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

Page IV - 8
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:

- Information/counseling assistance and program administration;
- University rental housing;
- Mortgage assistance;
- Downpayment assistance;
- Housing allowance assistance; and,
- 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 Noeleani 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 L50 > 62dBA 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, Kapioani) 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 Pilkoi 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 maoku 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 exceed 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 Waipahu 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 1,116 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.
Hale Kewalo
Rental Housing Mixed-Use Development

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:

<table>
<thead>
<tr>
<th>Grade</th>
<th>Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>K-5</td>
<td>72</td>
</tr>
<tr>
<td>6-8</td>
<td>9</td>
</tr>
<tr>
<td>9-12</td>
<td>27</td>
</tr>
</tbody>
</table>

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 Kapioali 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
Hale Kewalo
Rental Housing Mixed-Use Development         Final EIS

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 837 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
Hale Kewalo
Rental Housing Mixed-Use Development

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
Hale Kewalo
Rental Housing Mixed-Use Development

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
April 3, 1992

Mr. Eric J. Masutomi
Director of Planning
Hawaiʻi 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 (FE-89)
Honolulu, O'ahu

Thank you for the opportunity to review this application.

A review of our records shows that Wetkeley High School (State Site 50-60-14-996), 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 996.

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 in conjunction with construction activities and would not impose significant time or financial burden.

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

Sincerely,

DARNELL H. HEBBARD
Administrator
State Historic Preservation Division

February 19, 1992

Mr. Michael N. Scarfone
Executive Director
Hawaiʻi Community Development Authority
State of Hawaiʻi
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 (TMID: 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-foot or larger sewer 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
Manager and Chief Engineer
Mr. Eric J. Manutomi  
March 16, 1992  

Mr. Eric J. Manutomi  
March 16, 1992  

Dear Mr. Manutomi:

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

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 Kurokawa, 523-4671.)

C. MICHAEL STREIFER  
Acting Director and Chief Engineer
February 26, 1992

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

Dear Mr. Masutoni:

Subject: Hale Keawalo Planned Development Project
        KHKakaako Project
        Project Eligibility Application
        TMK: 2-3-06: 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.

Should you have any questions, please contact Lance Watanabe of my staff at 523-4159.

Sincerely,

JOSEPH M. MAGALDI, JR.
Director

cc: Imata & Associates, Inc.
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: Hala Kaiola Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-14-09
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, WDA
September 23, 1992

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

Dear Mr. Edwards:

Hale Kewalo Rental Housing Development
Draft Environmental Assessment (DREA)
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 Pecauloa Street and Kapolokal 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 a statement is found in Chapter 344, HR ("State Environmental Policy") and Chapter 226, HR ("Hawaii State Planning Act"). In particular, Chapter 226-10 (a 1) (b) and (c 1) (2); 226-52 (a) and (b) (2) (b); and 226-101 (f) (1) and (2) should be considered.

As there may be substantial energy impact from this project, we would recommend that you consider 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. Kaye
Energy Program Administrator

cc: Wilson, Okamoto & Associates, Inc.

October 27, 1992

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

Dear Mr. Kaye:

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 HDOE 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 efficiency motors. The building is designed to 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. Ali Alhana, HFCDC
Mr. Earl Matsukawa, WOA
September 4, 1992

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 Kauiloa Rental Housing Development
Draft Environmental Assessment (Draft EA)
Honolulu, Oahu, Hawaii

We have reviewed the subject draft for the proposed development on the former Kapilani 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.

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:

<table>
<thead>
<tr>
<th>School</th>
<th>Grades</th>
<th>Projected Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kamehameha Elementary</td>
<td>K-5</td>
<td>95</td>
</tr>
<tr>
<td>Central Intermediate</td>
<td>6-8</td>
<td>32</td>
</tr>
<tr>
<td>McKinley High School</td>
<td>9-12</td>
<td>42</td>
</tr>
</tbody>
</table>

Kamehameha Elementary and McKinley High Schools are both operating beyond capacity. There is no room to add additional classrooms at the Kamehameha 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 size 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 245 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.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

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 30 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 160 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. Toochi
Superintendent

CC: A. Suga
    J. Kia
    OEO
    Wilson, Okamoto & Assoc., Inc.

-----------
Mr. Harold Edwards  -3-  September 4, 1992

Mr. Harold Edwards  -3-  September 4, 1992

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

Dear Mr. Toochi,

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-091
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 20E-ES, Hawaii Revised Statutes, which supersedes 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. 341, 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 Kakaako, including the proposed project, the DOE has not concluded that additional schools will be required.

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

344. The HCDA continues to meet with DOE officials regarding the impact of redevelopment in Kakaako on the school system. The proposed project 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 educational 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 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 1-3/4 acres of park/open space along Kapolei 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 Peninsula Street near the project. The removal of parked cars will improve lines of sight and provide a longer queuing lane for vehicles turning right on Kapolei 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 42-3, 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 Peninsula Street between King and Kapolei 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 acknowledgment of the HCDA’s effort to address education in the proposed mixed-use Hale Kewalo facility. Our response Nos. 141 identifies other aspects of the project benefiting 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.
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, RFDC
    Mr. Earl Matsukawa, MOA
MEMORANDUM

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

FROM: William M. Pfy, Chairman
       Board of Land and Natural Resources

SUBJECT: Hale Kewalo Rental Housing Development Draft Environmental Assessment, Honolulu, Hawaii, TX: 2-3-92. 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. Nakamoto, Director of Planning, Hawaii Community Development Authority as follows:

A review of our records shows that McKinley High School (State Site 50-80-16-9926), 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.

The EOA contains as Appendix B an Archaeological Assessment of a 2.33 acre Parcel in the Kapolei Business District by Osgood and Harvett, Cultural Surveys Hawaii. This report documents the natural environment on 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 completion 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 Yee of Historic Sites at 587-0944, or Sue Lemo at our Office of Conservation and Environmental Affairs, at 587-0377, should you have any questions.
October 27, 1992

The Honorable William W. Patsy
Chairman
Department of Land and
Natural Resources
Room 130
1451 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Patsy:

Re: Hala 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,

[Signature]

Harold Edwards,
Development Director

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

TO: Harold Edwards, Project Coordinator
   Housing Finance and Development Corporation

FROM: Don Hibbard, Administrator
       State Historic Preservation Division

SUBJECT: Hale Kaukela Rental Housing Development Draft
         Environmental Assessment (DEA)
         Honolulu, O'ahu, O'ahu

TAKE: 2-3-92 1

HISTORIC PRESERVATION PROGRAM CONCERNS:

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

A review of our records shows that McKinley High School
(State Site 50-80-14-926), 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
impact" on the historic character of site 926.

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
wetland deposits, we recommend that excavations occur to
determine deposits, if any, to collect samples for pollen and
dating analyses. Analysis would then need to follow and prepare of
an acceptable report.

Harold Edwards
September 16, 1992
Page 2

The DEA contains an Appendix B an Archaeological Assessment of
a 5.73 Acre Parcel in the Kapiolani Business District by
Choizigol and Hamiltt, Cultural Survey 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 present and to
collect appropriate pollen and charcoal samples for analysis.
We concur with these recommendations.

TD: Frank
Cc: OEQC, Wilson Okamoto
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,

[Signature]

Harold Edwards,
Development Director

CC: Mr. Al Abana, HFDC
Mr. Earl Matsukawa, WOA
TO: Harold Edwards  
Housing Finance and Development Corporation

FROM: Rex D. Johnson, Director  
Department of Transportation

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT, HALE KEHALO RENTAL HOUSING DEVELOPMENT, HONOLULU, OAHU, INK: 2-3-92: 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 Kehalo 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,

Rex D. Johnson  
Director  
Department of Transportation

cc: Mr. Al Ahana, HEEDC  
Mr. Earl Matsuoka, NOAA

Brian J. J. Choy  
DEGC  
220 South King Street, 4th Floor  
Honolulu, Hawaii 96813  
Earl Matsuoka  
Wilson Obasako & Associates, Inc.  
P.O. Box 3530  
Honolulu, Hawaii 96814
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 Kawaol 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 ensure 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 led to traffic and noise related complaints against the school. School activities such as athletics, marching band practices, outdoor activities, and events such as athletic events, band practices, and outdoor activities such as baseball games and concerts will generate traffic and noise complaints from adjacent residents such as the proposed project. In addition, the subject site is near to other annual activities such as the State Fair and political rallies and relatively close to the Neal Blaisdell Center.

If you have any questions, please call Jeyan Thirugnanas at 946-4185.

Sincerely,

[Signature]  
Brian J. J. Choy  
Director

c: Mr. Al Khara, HFDC

October 27, 1992

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

Dear Mr. Choy:

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

Thank you for your letter of August 26, 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 1992. 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, we 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 (Pikoi, Panasola, Kapioan) 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
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,

[Signature]

Harold E. Evans,
Development Director

cc: Mr. Al Ahna, HFDC
Mr. Earl Matsukawa, MDA
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, TRM: 2-2-09: 1, Pauoaola Street and Kapahulu 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.

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

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 Kuioka at 527-5235.

Very truly yours,

KAZU HAYASHIDA  
Manager and Chief Engineer

cc: Office of Environmental Quality Control  
Wilson Ohimoto & Associates
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 Kawaole Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-0931
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
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 Kualo 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,

[Signature]

C. JAMES TURSE
Director

cc: OEOC

October 27, 1992

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

Dear Mr. Turse:

Re: Hale Kualo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-09:11
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,

[Signature]

Harold Edwards,
Development Director

cc: Mr. Al Aiana, HFDC
Mr. Earl Matsukawa, WOA
Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Attention: Mr. Harold Edwards

Hale Kewalo Rental Housing Development
Draft Environmental Assessment (DEA)

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 81-78, 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) (1) - 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.

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. II as consultative 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 Kalihi 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 at 527-6670.

Sincerely,

[Signature]

LEONARD B. LEE
Chief Planning Officer

BBL:ef
October 27, 1992

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

Dear Mr. Lee:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Keys: 2-3-8941
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. 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 Maau Area Plan and Rules as established by the Hawaii Community Development Authority pursuant to Section 206-E, Hawaii Revised Statutes.

2. 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.

3. Toward assuring that public educational facilities will meet future demands of development in the Kakaako area, the HCDA continues to review and discuss student enrollment projections with DOE officials. The current projections prepared by DOE indicate 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 Maau Area Rules for the Kakaako Community Development District.

6. The proposed 1-3/4 acre park/open space along Kapiliwai 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 ETD parking lot along Pauoa 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
Mr. Harold Edwards
Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Edwards:

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 2-1 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.

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 927-5349.

Very truly yours,

[Signature]

DONALD A. CLEGG
Director of Land Utilization

cc: GEQC
October 27, 1992

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

Dear Mr. Clegg:

Re: Hale Kawai Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-091
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 Kawai 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 Kapilani 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 Kapilani Boulevard and Kakaako 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 have 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 Eva side of Pensacola Street near the project, future traffic with the project will only increase the delay time at the Pensacola/Kapilani 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 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 Kapilani Boulevard are designated as view corridors and are subject to view corridor setbacks.
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 approx. 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,

[Signature]

Harold Edwards, Development Director

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, HDA
Mr. Harold Edwards  
Project Coordinator  
Housing Finance and Development Corporation  
State of Hawai'i  
Seven Waterfront Plaza, Suite 300  
Honolulu, Hawaii 96813  

Dear Mr. Edwards:

Subject: Draft Environmental Assessment (DEA)  
Hale Kewalo Rental Housing Development  
TK62-3-0224  

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,

Michael Street  
Director and Chief Engineer

Cc: Mr. Al Afsa, HFDC  
Mr. Earl Matsukase, WOA

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

October 27, 1992

Dear Mr. Street:

Re: Hale Kewalo Rental Housing Development  
Draft Environmental Assessment  
Tax Map Key: 2-1-091  
Honolulu, Oahu, Hawaii

Thank you for your letter of September 18, 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  
Development Director
Mr. Harold Edwards  
Project Coordinator  
Housing Finance and Development Corporation  
State of Hawaii  
Seven Waterfront Plaza, Suite 100  
500 Ala Moana Boulevard  
Honolulu, Hawaii 96813  

September 25, 1992  

Dear Mr. Edwards:  

Subject: Kalo Kevalo Rental Housing Development  
Draft Environmental Assessment  

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 the 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 uninterrupted 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.  

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 523-4169.  

Sincerely,  

[Signature]  

[Name]  

Director  

cc: Office of Environmental Quality Control  
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 KealohO Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-091
Hawaii, 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 the traffic study, parking along project frontage on both sides of the project 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 the hierarchical model from the Institute of Traffic Engineers. Vehicular trips generated by the EFO facility and building 574 were based on those for government office facilities. In this regard, the traffic study used .5 to .6 vehicles per stall entering and leaving the project site during peak traffic hours. These figures were derived from parking studies conducted by Procansky and Associates, Inc.

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, RFDC
Mr. Earl Matsukawa, WOA
September 14, 1992

Mr. Joseph K. Conan, 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. Conan:

The Maile 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

By:

CHESTER E. HUGHES
Assistant Chief of Police
Support Services Bureau

CC: OKEC
Wilson Okamoto & Associates

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

Re: Maile Kewalo Rental Housing Development
Draft Environmental Assessment
Draft Map Key: 2-1-0911
Honolulu, Oahu, Hawaii

Thank you for your letter of September 14, 1992 indicating that you have no comment on the subject Environmental Assessment/Notification. 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,

[Signature]
Harold Edwards
Development Director

CC: Mr. AI Abana, HFDC
Mr. Earl Matsukawa, WOA
September 20, 1992

Housing Finance and Development Corporation
State of Hawaii
Seven Waterfront Plaza, Suite 100
500 Ala Moana Boulevard
Honolulu, HI 96813

Dear Mr. Harold Edwards,

At the request of Mr. Gail Sykes of McKinley High School, I have reviewed the Environmental Assessment (EA) of the Kali Kawai 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 Kali Kawai Community College. Since this "site" is state-owned, the State should 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
1718 Moana St. Apt. 2
Honolulu, HI 96826

September 20, 1992

Gail Sykes
Save McKinley High School Coalition
McKinley High School
1029 South King Street
Honolulu, HI 96814

Ms. Sykes,

At your request I have examined the Environmental Assessment on the Kali Kawai 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 (prehistoric 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 Kali Kawai 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 laying 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" (the area now being negotiated for) 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
Includes the Honolulu Academy of Art, Thomas Square, and the old Linenana "site" of McKinley High School (1906–1931).

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 1927 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 contribute to the architectural 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 native Hawaiian to the "site" in question. Please call me if further information is needed.

Ray Gay
1778 Wai'anae St., Unit 8
Honolulu, HI 96816
Mr. Barry Gay
Apartment E
1738 Hanae Street
Honolulu, Hawaii 96826

Dear Mr. Gay:

Re: Hale Kewalo Rental Housing Development
Draft Environmental Assessment
Tax Map Key: 2-3-095-1
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 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 Pennacola Street from the project site and elsewhere in the Kakaako District. These taller structures will join the existing 400-foot Kaua 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 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 1
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,

[Signature]

Harold Edwards
Development Director

cc: Mr. Al Ahana, HFEC
    Mr. Earl Matsuoka, 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 conflict 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 are:

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 Makau Area Plan of the HCDA.

2. 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 ETU 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 necessary since 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 Makau Area Plan documents identify the McKinley School site and the former Poloukoua site as school locations to meet the demand for two to five elementary schools in the Mauka Area alone. This same HCDA Makau Plan suggests that elementary schools have a service radius of 1/4 to 1/2 mile. The closest elementary school is now Kaimuki, 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. If the Mauka Area alone will have the need for two to five schools, what about the effect on the higher grades? The Makau area is one of only one sixth of the McKinley District. The Makau Area Plan envisages 19,000 residential living units in the Mauka Area alone. Using the relationship from the DOE of population and public high school students, the Makau Area alone would add 1,500 high school students to McKinley. As other residential projects are built, such as the Paaua Super Block (2,000 units), other residential blocks downtown, in McCully, Kawai, Kalili, Palena, 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.

3. 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 acres 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 to build housing; not the first.

4. The health of the public living in the project as well as the people using the McKinley School facilities is in clear need of space. On one hand, the people living in the project will have certain price and quiet expectations. On the other, the McKinley campus is a major school facility with full activities, sports, bands, dance, practice sessions, etc., 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 closure is the lease and the option for air conditioning will solve all problems is irresponsible without documented of where this solution has worked. To not address these concerns in a realistic 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 use of the land. The lack of plans, if any, 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 reality of Manoa is 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 Pauoa Street to get to Pilkis Street to go makua 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 $6.5 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 almost 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 Kaka'ako Project with only 154 residential units (Hale Kewalo has about 350 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 Kaliua 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 Blaisdel and McKinley is improved with active low, the public structure. Hale Kewalo would be a major departure in that it will have two high-rise towers and not be open to the public (or to Hawaiian 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 money. 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 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 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, Maudana, 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 Blaisdel and Blaisdel Center is directly contiguous with (portions are actually part of) the Thomas Square/Honolulu Academy of Arts Special District. Together, this Special Districts and the McKinely/Blaisdel 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 McKinely 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.
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. As 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
McKinley P.T.S.A. President

Patricia Hamamoto
Principal, McKinley High School

cc: Office of Environmental Quality Control
Attn: Mr. Brian J. Choy
Attn: Mr. Earl Matsumana

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

Dear Mr. Kadooka, et al.:

Mr. Paul Kadooka
President
McKinley High School P.T.S.A.
Mr. Patricia Hamamoto
Principal
McKinley High School
Representatives Hirono, Tan, Higino, and Hiraki

C/o Mr. Paul Kadooka
Apartment 407
1610 Kamakau Avenue
Honolulu, Hawaii 96813

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 Mauna Loa 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 827 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 Kapahulu Boulevard. The EA will be revised to clarify that the proposed development will preclude the site from being used exclusively for educational purposes.
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 4-1, 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 these standards. In areas such as the Diamond Head side of Penaauoa Street between King and Kapoholi streets designated almost entirely for residential mixed-use development on the HCDA's Naka 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 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 4-1 (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 plan. 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. 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 saka of the driveway serving McKinley High School. Appropriate signage and barriers will keep residents from using the high school's driveway. During the morning peak traffic hours and anytime traffic is heavy, residents intending to drive to the freeway will turn right onto Pensacola, cross Kapioi Boulevard, proceed to Waiman Street, turn left, then turn left again to go up Pilkoi Street. Another way to get onto Pilkoi is to make a left turn from the intersection of Kapioi on Pilkoi to the freeway will turn right onto Pensacola, cross Kapioi Boulevard and proceed to Waiman Street, turn left, then turn left again to go up Pilkoi Street. This maneuver can be safely executed in lighter traffic but would not be viable during the morning peak traffic. Since the left turn from Kapioi onto Pilkoi is prohibited during these hours. While it may also be tempting to cut against the one-way flow on Pensacola to get to nearby Kanalale Street, and from there onto Pilkoi, 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 Kaualo 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.

7. We shall expand the discussion of the "no-action" alternative with respect to the continuation of the ETO in its current facilities. The long-term forecast of the alternative uses at the project site is discussed in Chapter VII, Section A. In this chapter, the discussion will be expanded to include the forecast of the site for exclusivity educational uses. With respect to noise impacts, please refer to our response Nos. 10 and 13. 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
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 Kapolei Boulevard and the low rise structures at McKinley High School.

With respect to public accessibility, Building 827, 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 Kapolei Boulevard will create a freely accessible 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 recommendation for subsurface testing prior to construction. The recommendation does not automatically imply a significant impact, but is routinely required when
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,

[Signature]
Harold Edwards
Development Director

CC: Mr. Al Ahan, 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. Rory Gay, archaeological consultant, has reviewed the Environmental Assessment of the Hale Iwale 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 issues 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 these 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 Iwale 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 Waimanalo when the Duty Free Shoppers erected their new facility.

I note that the archaeology was not done before Kapalama 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 NCC/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 Hinalei and Iwale area the fact that the area once contained fish ponds and fish caves. I also note that in the land records, at least one of the owners of the land was a Nate Parker of Lualua (deed book No. 9960). I am documenting whether she and other owners were Hawaiians. There is, I am sure, a historical record of the area. Many Hawaiian families lived in the area. Research will reveal information of significance.

The issue of the high water table in this area is not discussed. There are springs below McKinley High School which have recently inquired 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 KCC/McKinley parcel is marshy land. Might not the water table be a problem should the Hale Iwale construction and construction of the 28-story buildings commence?

Finally, I have observed the survey markings on the pavement at both the KCC/McKinley site and at McKinley High School. Note this area 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 these issues have not been revealed which require further investigation. The adverse impact of the project for the benefit of any short-term benefit for a few who would occupy the tower.

As it stands, the Environmental Assessment is not adequate. An environmental impact statement needs to be compiled and approved 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.

Sincerely,

[Signature]
Mr. Gail A. Sykes
Save McKinley High School Coalition
1032 10th Avenue
Honolulu, Hawaii 96814

Dear Mr. 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 996, 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 Penascola 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 Penascola Street from the project site and elsewhere in the Kakaako District. These taller structures will join the 400-foot Hauku Tower and the shorter project towers in establishing the high-rise character of the backdrop to
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 seismic 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 1969. 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 65-8, 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 pilings 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 HCD. 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/NEPA Declaration or a Final EIS; and, the recommended
Ms. Galen A. Sykes
Page 4
October 27, 1992

The 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, NFC
Mr. Earl Matsukawa, MDA
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
THK 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. 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, §243-5.

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 resources 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 Fifteenth 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.” Used for any other purpose violates the intent of EO 101. Further, Executive Order No. 3567 (EO 3567) executed by Governor Bagbee 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 purpose 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 Kapolei
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 HCD&A'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 coming 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 Hauurn 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 projects 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 Kakako
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 non-existing Employment
Training Office will need to be relocated, 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
impact 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,

[Signature]
Representative Cynthia Thielen

CC: Office of Environmental Quality Control
Attn: Brian J. Cho

Attn: Earl Matsukawa
Representative Cynthia Thielen  
House of Representatives  
State of Hawaii  
State Capitol  
Honolulu, Hawaii 96813  

Dear Representative Thielen:

Re: Hala Kekalani Rental Housing Development  
Draft Environmental Assessment  
Tax Map Key: 1-3-091  
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...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, SB 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 citizen 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. 8676 pursuant to Chapter 206-E, Hawaii Revised Statutes, which superseded Executive Order No. 101. The subject EA is being processed based on this understanding.

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 irreversibly 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, DOI. As residential and other noise-sensitive developments have occurred near locations where noise producing activities take place, the DOI has been called upon to enforce those standards. Inasmuch as the diagonal head side of Pensacola Street between King Street and Kapiolani Boulevard is designated almost entirely for residential mixed-use development on the HCOA'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 DOI 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 HCOA'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 men's environment and the maintenance and enhancement of 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 congestion is provided during peak hours 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 construction workers will be more than offset by the absence of commuters to the existing LTO 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 Kapiolani Tower, Phase I, and the Kapiolani 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 those 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 Pali Kealake project as exclusively an affordable housing project. The proposal mixed-use of the site for housing, recreation, as well as education activities, serves to ensure that this valuable public
resource is most effectively utilized to address the broadest range of HCDA's objectives and policies. Toward addressing educational uses, the project includes the new ETO facility and also preserves the use of Building B57 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 Kapiohi 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 facilities, address educational needs in general, as well as provide such needed 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 Kakako area, the HCDA continues to review and discuss student forecasts with DOE officials. The current student forecasts prepared by DOE include an increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal increase in demand that will be the marginal

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 Mauna area. That was done in the EIS prepared for the Mauna Area Plan by the HCDA in 1983. An EA was required for the Kaleo 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 Mauna 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,

[signature]

Harold Edwards,
Development Director

CC: Mr. Al Ahana, HDFC
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 Keaolo (KCC-McKinley) Rental Housing Mixed-Use
Environmental Impact Statement Preparation Notice (EISP)
Tax Map Key: 2-3-0911; Honolulu, Oahu, Hawaii

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

Thank you for the opportunity to review the document.

MICHEAL M. SUEKOSHI

CC: Office of Environmental Quality Control
Hawaii Community Development Authority

Ref. No.: PL GEM 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 2359
Honolulu, Hawaii 96804

Dear Mr. Kaya:

Re: Hale Keaolo Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation Notice (EISP)
Tax Map Key: 2-3-0911
Honolulu, Oahu, Hawaii

Thank you for your letter of February 12, 1993
indicating you have no comments on the subject EISP.
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
Director of Planning

CC: Mr. Al Abana, HFDC
Mr. Earl Matsukawa, WOA
MEMO TO: Mr. Joseph K. Conant, Executive Director
        Housing Finance & Development Corp., DBEDB

FROM: Mr. H. McElroy
        Department of Education

SUBJECT: Environmental Impact Statement Preparations Notice (EISP)
        Hale Kawalii (KCC-McKinley) Rental Housing Mixed-Use
        Development, Thu. 2/13/93.

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  |    Students |
   -----------------+------------|
   Kaahumanu Elementary  K-5  |  95        |
   Central Intermediate  6-8  |  34        |
   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.

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 Kapalama 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
areas mentioned on Page 25 will certainly be obstructed.
The setback will be away from the street but excess
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.

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.

February 10, 1993

Mr. Joseph K. Conant

February 10, 1993

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  |    Students |
   -----------------+------------|
   Kaahumanu Elementary  K-5  |  95        |
   Central Intermediate  6-8  |  34        |
   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.

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 Kapalama 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
areas mentioned on Page 25 will certainly be obstructed.
The setback will be away from the street but excess
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.

February 10, 1993
Mr. Joseph K. Conant

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 to 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.

Cc: A. Suga, Asst. Sept.
    E. Masagatan, RGB
    B. Choy, OEQC
    H. Edwards, HCDA
    Wilson, Okamoto & Assoc., Inc.

Ref. No.: PL GEN 1.15h.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 Kewale Rental Housing Mixed-Use
Development
Environmental Impact Statement Preparation
Notice (EISP)
Tax Map Key: 2-2-09-11
Honolulu, Oahu, Hawaii

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

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) data 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 Kapalama 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. Togooshi
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 Mauna 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,

[Signature]
Eric J. Masutani
Director of Planning

cc: Mr. Al Ahanu, HFUC
Mr. Earl Matsukawa, WOA
FEB 19 1993

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

Dear Mr. Clontz:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for the Hale Kewalo (KCC-1835) Rental Housing Mixed-Use Development, Honolulu, Oahu. THK 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 Young at our Office of Conservation and Environmental Affairs, at 507-0377, should you have any questions.

Very truly yours,

John P. Keppeler, II
Acting Chairperson

CC: HCDA
       KCC
       Earl Matsukawa

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 421
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 1, 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,

[Signature]

Eric J. Mautto
Director of Planning

CC: Mr. Al Ahana, HFDC
    Mr. Earl Matsukawa, WOA
Mr. Mike McElroy  
January 26, 1993  
Page Two

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 (EISP)  

We have reviewed the referenced EISP 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 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 current 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.

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

Sincerely,

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
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
2446 Dole Street, Bachman Hall
Honolulu, Hawaii 96822

Dear Mr. Horii:

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

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

We appreciate your clarification of plans for the project site if the Male 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 807, 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,

[Signature]

Eric J. Masutomi
Director of Planning

CO: Mr. Al Abana, HFDC
Mr. Earl Matsukawa, HDA
February 1, 1993

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

Dear Mr. McElroy:


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.

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 Kiloka at 527-5235.

Very truly yours,

Kazu Hayashida
Manager and Chief Engineer

cc: Hawaii Community Development Authority
Office of Environmental Quality Control
Waiwai Okamoto & Associates, Inc.
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 Kualo 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 1, 1993
commenting on the subject EISPN. 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,

[Signature]
Eric J. Resnick
Director of Planning

cc: Mr. Al Abana, HFDC
Mr. Earl Hattori, WOA
February 22, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
Suite 306
677 Queen Street
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Makaha Rental Housing Mixed-Use Development
Environmental Impact Statement Preparation Notice (EISPN)
Fax Num Key: 2-501, Ext. 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 29, 1992) for your use.

2. The DEIS should describe how the broader community’s housing needs would be met by the proposed 320 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 affected programs, where they will be relocated, and discuss any mitigation if relocation cannot be found.

5. The EISPM (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 EISPM states that “on-street parking should be removed from the Ewa side of Pensacola Street along the project frontage... Also, the one mid-block on-street parking section along the Diamond Head side of Pensacola Street in the block south of Kamille 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 Clegg
Director of Land Utilization

DAC:SCO
Attach.
cc: HCDA
DEIS
Aranaga, JMC
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 Kekaha Rental Housing Mixed-Use Development
Environmental Impact Statement Preparation Notice (EISPN)
Tax Map Key: 2-3-091
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.

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 Kekaha project will provide a total of 716 parking spaces within the development. This exceeds the NCDA's requirement of 642 spaces for the various uses by 74 spaces. By comparison, the 10 unmarked on-street parking spaces will be lost as a result of prohibiting parking on the Rha and another 3 to 4 spaces will be lost by prohibiting parking on the Diamond Head side of Pensacola, immediately north of Kamille Street.

Park demands in the area will be addressed by the planned expansion of the municipal parking at the landfills in the center of Pensacola and Wallanan 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 143, HR 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.

Very truly yours,

[Signature]

Eric J. Harutomi
Director of Planning

cc: Mr. Al Ahana, HPDC
Mr. Earl Matsukawa, WOA
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 a supplement to this area, a recreational/community facility, be included in the affordable and faculty residential areas.

Should you have any questions, please call John Norihara of our Advance Planning Branch at 523-6246.

Sincerely,

WALTER M. OZAWA, Director

cc: Office of Environmental Quality Control
Wilson Ono and Associates, Inc. (Earl Matsukawa)

We Add Quality to Life
The Honorable Walter N. 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,

[Signature]

Eric J. Masutomi
Director of Planning

c/o: Mr. Al Ahana, HFDC
Mr. Earl Nishinaka, WOA
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 (EISPIN)  
Hale Kawaiho Rental Housing Mixed-use Development  

ENV 93-46  

February 23, 1993  

We have reviewed the subject EISP for 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.

5. The Division of Waste Water 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  
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.
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 (EISPNI)  
Kali Kaulo Rental Housing Mixed-use Development  

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

1. Standard property line corner rounding may be required at the intersection of Kapiohali Boulevard and Penaquck Street.

2. The EISPNI should address the impact of storm water discharge associated with construction activities on water quality of the receiving waters.

3. The EISPNI 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.

February 23, 1993

C. Michael Street  
Director and Chief Engineer  

cc: Hawaii Community Development Authority
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 MPDES permit will be required. However, if a change in regulations occurs 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.

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. Habutomo
Director of Planning

cc: Mr. Al Abara, HFDC
Mr. Earl MacKiwana, WOA
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 Environmental Impact Statement Preparation Notice (EISPN)

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 Kamehameha Street. This access should be a curbed cut driveway. Signaling, signing, and striping at the new driveway access/Pensacola Street/Kamehameha Street intersection should be provided.

Should you have any questions, please contact Lance Watanabe of my staff at 523-1499.

Sincerely,

JOSEPH MAGALDI, JR.
Director

cc: Hawaii Community Development Authority
Office of Environmental Quality Control

Ref. No.: PL GEN 1.150.2

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: 2-2-09:1
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 Kamehameha 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 Honduras Highway, via Kamehameha Street and Pensacola Street. Our traffic engineer has advised us, however, that the installation of a traffic signal on Pensacola Street to the Kapalama Boulevard signal would 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.
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,

[Signature]

Eric J. Hasutomi
Director of Planning

cc: Mr. Al Ahana, HFDC
    Mr. Earl Matsukawa, MDA
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: 2-3-091-1

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

cc: Hawaii Community Development Authority
    Attn: Mr. Harold Edwards
    Office of Environmental Quality Control
    Attn: Mr. Brian J. J. Choy
    Attn: Mr. Earl Matsumura

Ref. No.: PL GEN 1.156.2
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: 2-3-091-1
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 75,000 square feet of new classroom space proposed for construction within the existing campus under the McKinley High School Campus Development Report (DAG5, 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.
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,

[Signature]

Eric J. Matsutomi
Director of Planning

cc: Mr. Al Abana, HFDC
Mr. Earl Matsukawa, WOA
February 22, 1993

Housing, Finance and Development Corp.,
State of Hawaii
637 Queen Street Suite 300
Honolulu, Hawaii 96813

Dear Mr. Morley:

Subject: Hale Kewalo 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 Kewalo EIS.

The loss of Hale Kewalo 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 national magnet school concept. 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 made possible because of McKinley’s location between downtown and Ali Wana 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 Center with a full school enrollment of students within the school boundary.

Sincerely,

John Steelquist
Chair

cc: Hawaii Community Development Authority
Wilson, Okamoto and Associates
Councilmember Andy Mirkkanen
Senator Carol Fukunaga
Representative Ed Tam
Representative Jim Shun

Oahu's Neighborhood Board System Established 1973
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  
Educational Impact Statement (EIS/P)  
Tax Map Key: 2-3-09:1  
Honolulu, Oahu, Hawaii

Thank you for your letter of February 22, 1993 commenting on the subject EIS/P. We offer the following responses:

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 the 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 conclusion 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 (DGAS), suggests that 15,000 square feet of new classroom space should eventually be provided to accommodate a population of 1,400 students at the high school. Currently, the enrollment at the high school is 1,972 students. The 15,000 square feet of new classroom space would be constructed within the existing campus. If Building #57, 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 #57 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,

[Signature]

Eric J. Masutomi  
Director of Planning

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

March 29, 1993  
March 29, 1993
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-Use 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 1,100 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 Pauoa Superblock project. The completion of the Mauna 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 Kahaluu Elementary School, currently are both operating at maximum capacity. Hale Kewalo has projected an increase of enrollment of 42 students to McKinley and 35 students to Kahaluu, 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 Thilen
State Representative

cc: Brian Choy
Office of Environmental Quality Control
Harold Edwards
Hawaii Community Development Authority
Earl Matsukawa
Wilson Ushimoto & Associates, Inc.
March 29, 1993

The Honorable Cynthia Thielen
House of Representatives
State of Hawaii
State Capital
Honolulu, Hawaii 96813

Dear Representative Thielen:

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 commenting on the subject EISP. 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 200-58, Hawaii Revised Statutes, which supersedes Executive Order No. 101. The EIS is being processed based on this action.

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 Kahumano 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 Kahumano. 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 (MCIS, 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 Thielen
Page Two
March 29, 1993
The Honorable Cynthia Thielen  
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,

[Signature]

Eric J. Nadotol
Director of Planning

cc: Mr. Al Khan, HFD
Mr. Earl Matakon, WDA
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 overtime? How will the increase in people affect the parking situation? Will there be additional parking stalls created? If so, will there be increased security to monitor parking areas?

4. POTENTIAL ADVERSE IMPACT on the fiscal, logistical, and physical plant components of the McKinley campus due to increased multiple use by the public due to increased population at Nale Keawalo.

Sincerely,

Teachers at McKinley High School
March 29, 1993

Teachers at McKinley High School
c/o McKinley High School
1039 South King Street
Hawaii 96814

Dear Teachers:

Re: Hale Kewalo Rental Housing Mixed-Use Development

Thank you for your letter of February 19, 1993 commenting on the subject EISPA. We offer the following responses in the respective order of your comments:

1. 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.

2. In the urban design context, public views from scenic vantage points or highly traveled areas are often targeted for protection. Thus, the view...
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 wet conditions of wind and wind. The chronic and persistent condition you refer to suggests that the condition may 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 Kawa project will have on traffic at the King Street/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 Kawa. 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 HCD 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 problem for residents to enter the school campus on foot or 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 construction work's vehicles will be parked on the project site during construction. Occasional restriction 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. Construction traffic would 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. Nishimura
Director of Planning

cc: Mr. Al Ahana, HFD
Mr. Earl Matsukawa, WOA
February 22, 1993
Hearing Finance and Development Corporation
State of Hawaii
691 Queen Street, Suite 300
Honolulu, Hawaii 96813
ATTN: Mr. Mike McElye

Dear Mr. McElye,

Subject: Hale Waiola Rental Housing Development As Planned For The Corner of Kamehameha Avenue and Palaniwa Street
Environmental Impact Statement Concerns

We are happy to hear that the decision to implement the Environmental Impact Statement process has been reconsidered and that the administrative hearings previously scheduled have been cancelled. 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 conclusion 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 a residential high-rise building on a public school campus in a growing city.

1. Our concern should be given to alternative sites (short and long term) for the site which would result in a "highest and best use" of the land in the long term best interests of the public as a whole. This concern is extreme since the proposed project would essentially preclude alternative uses as a highly central and very public service oriented city block.

2. The site is the logical choice for temporary classrooms while the McElye Administration building is reconstructed. The site may also be used to house other McElye 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 concern since the site could also be used as a joint educational and recreational facility (for example, as at Alaakai).

4. Alternative sites for an 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 front of Honolulu. Land uses are none or areas outside of current Honolulu and may be more in line with the objectives of the "Neighborhood" concept. Also the wisdom of building university housing that is not open to any campus needs to be evaluated objectively and appropriate faculty preferences queried. Consideration may be given to the site of the West Oahu Campus 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. Redevelopment of existing University buildings to higher densities are also another possibility. Conversion of the faculty house on the Diamond Head Campus is also possible. Also realistic is a faculty allowance plan which could be intended to be less costly than fixed interest payments. Faculty reserves would probably be greater if they had no equity interest rather than just an interest in a public housing project. We wonder if it would not be wise to find out the exact problem and magnitude of the problem on research of staff. Does University faculty compensation compare?

6. Impact from the direct community should be analyzed. The categories should include (but not be limited to) people from adjacent areas, workers who would lose the open and views of a public facility block, students, parents, teachers, (presently at McElye 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 not as newer schools should be studied. It would be difficult to understand objectivity that did not analyze similar circumstances.

8. Full and open communication should occur with the Department of Education. The realistic alternatives of the Department are important in the study of impact. Do growth projections of the HCDA and the DOE coincide? What about the growth in areas beyond Kakaako?

9. The need for additional space needs to be addressed. The Manor Area Plan identifies the need for five elementary schools. It suggests that these 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 Manor Area Plan identifies Palisades and KCC as possible future elementary school sites. In this context, what are the considerations?

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 income while a large number of residents and public school teachers are in need of housing alternatives.

12. What will be effects of picket driving on the classes and activities at McElye? What if the driving doesn't occur during the summer? What about the summer classes? How close is building A to collapse? Will the residence move collapse and re-erect?

13. Is the project an allowable and proper use of the site under the Manor Area Plan and Place of the HCDA?

We also hope to complete these concerns in our October 27, 1992 letter contained in the response to the Draft EA. We do not feel that the concerns raised in the EA are adequate, objective, or logical.

Sincerely,

Paulde La
McElye President

Principal, McElye High School

cc: Office of Environmental Quality Council

Attn: Mr. Brian J. Clay

Hawaiian Community Development Authority

Attn: Mr. Clingan-Gue

Wainehanu & Associates, Inc.

Attn: Mr. Hallmark

Gothi, Y. Kake

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

Mr. Paul Kadooka, et al.
HBS PTA 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 (EISPM)
Tax Map Key: 2-3-09:1
Honolulu, Oahu, Hawaii

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

1. The State EIS Law (Chapter 341, 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 Kealakeku 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. If that building is being renovated, the site is also assisting the school and the DOE in accommodating other functions which may eventually need to be relocated from the building.

If the Hale Kewalo project is not built, the property, including Building 857, will revert to the University of Hawaii.

3. The Hale Kewalo development is proposed as a mixed-use development which will address affordable housing and education, as well as recreation needs.

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 of Hawaii has only two sites available for housing: one at Manoa Valley near Honolulu 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 included. The faculty housing component is included. The faculty housing component is included. The faculty housing component is included.


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, HBCD and HCDA) may hold differing views on selected aspects of the project, the lines of communication between the various agencies has been open and active.

The growth projections of the HCDA and the DOE pertaining to the Ka'ahua District are generally consistent. As indicated in earlier correspondence with you on this matter, the HCDA has been working with the DOE since the mid-1980s to coordinate projections on student demand. These
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 of 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-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 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 Nauka 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.
Mr. Paul Kadoma, et al.
Page Five
March 29, 1991

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,

[Signature]

Eric J. Hasbom
Director of Planning

CC: Mr. Al Ahana, HFDC
Mr. Earl Matsuzawa, WOA
Dear Mr. McElroy,

Ms. 1st Vice President of the student body of McKinley High School, I am writing to inform you of the concerns raised by student body. During a Student Congress meeting, a vote was taken on the Hale Kaulu issue. The vote was unanimous against the proposed Hale Kaulu project if it is on the former site of the Pensacola campus of FCC.

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 Kaulu is 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 to deliver supplies to the construction site? Will traffic congestion be increased on Pensacola Street due to construction? Can construction vehicles also affect utilities belonging to McKinley High School, such as water and electrical power? At the completion of the Hale Kaulu project, other concerns will also be raised. How will McKinley's current happy student atmosphere be disrupted? We presently boast to be the only high school in the state to field every varsity boys' and girls' sport. Will we also have complaints from tenants that the State Fair is also held on an annual carnival and the State Fair will also be disrupted? Will the school restrict any of its students from attending the fair? We have heard that the contract for activities. Although we have heard that the contract for activities. Although we have heard that the contract for activities.

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
March 29, 1993

Ms. Vanessa Lee
MD 5C 1st Vice President
e/o McKinley High School
1019 South King Street
Honolulu, Hawaii 96814

Dear Ms. Lee:

Re: Hale Keawalo 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 and windows that 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 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 Keawalo 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 Keawalo site.

While the proposed provision in the Hale Keawalo 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.
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,

[Signature]

Eric J. Nabutoa
Director of Planning

CC: Mr. Al Abara, NFDC
    Mr. Earl Matsukawa, MOA
February 18, 1993

McKinley High School
1839 South King Street
Honolulu, Hawaii 96814

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
Chair, Science Dept.

cc. NFSC
Wilson Okamoto and Associates, Inc.

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

Ms. Barbara Rogers
Chair, NFSC Science Department
c/o McKinley High School
1839 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: 2-2-09:1
   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. Typically, 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 bailed trucks. It should also be noted that the Science Building lies upwind of the project site during prevailing tradewind conditions.
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,

[Signature]

Eric J. Makoto
Director of Planning

c: Mr. Al Ahana, RTDC
Mr. Earl Matsuoka, MDA
February 20, 1993

Mr. Mike McElroy
Housing Finance and Development Corporation
677 Queen Street, Suite 309
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 Kaualo Project, as you know from my previous communications to HWDC, 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 been shown that it is structurally in need of immediate renovation, I believe that the adverse effect of the Hale Kaualo 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 pedestrian 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 told they would not have to do so.

As for the joint use of the facilities, teams currently have to travel and practice in makeshift areas. Who will be an on-site manager if there 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 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 Kaualo 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,

[Signature]

Gilles H. Sakai
Teacher/Coach/Historian
McKinley High School

500 University Avenue, #911, Honolulu, Hawaii 96820
Ms. Sykes

500 University Avenue, #911
Honolulu, Hawaii 96826

Dear Ms. Sykes:

Re: Hale Kewalo Rental Housing Mixed-Use Development
Environmental Impact Statement
Preparation Notice (EISPMP)
Tax Map Key: 2-2-051
Honolulu, Oahu, Hawaii

Thank you for your letter of February 29, 1993 commenting on the subject EISPMP. 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 due to 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 Kapolei 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 tower, such locations are not identifiable as important scenic vantage points or view corridors.

3. 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 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 require 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 1988 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 Kapolei Boulevard and Pensacola Street is, however, being considered as a possibility.

5. The proposed project will exceed existing UHCA requirements for off-street parking. This includes 30 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 Panamint Street apparently have destinations near the Kapioi 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 Panamint and Welman 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 Keal 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,

[Signature]

Eric J. Hidaka
Director of Planning

cc: Mr. A. Ahana, HPDC
Mr. Earl Matsukawa, WOA
1310 Kakaako St., Apt. 1002
Honolulu, HI 96813
Nov., Feb. 22, 1993

To: Housing Finance and Development Corporation
Attention: Mr. Mike McNulty
677 Queen St., Suite 300
Honolulu, HI 96813

From: Amy Kimura

Subject: Hale Makaha Mixed-Use Development

EIS Preparation Notice Consultation Period Comments

(1) Intermix 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 this item on their list. 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 Palama campus of Kapiolani Community College, i.e., the Hale Kewalo site. It has several buildings and properties, all of which could easily and relatively quickly be converted into interim classrooms and offices.

(2) Recruiting Top-Rank UI Faculty.

The EISM states the project "addresses UI's need to recruit and retain top-rank faculty by designating one tower for housing for UI faculty." According to the UI Faculty Housing Assistance Master Plan (January 1991), pp. 23-241, the rental housing program should be comprised of 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 of 2-bedroom and 2-bedroom units, as these are harder to obtain in the private rental market. HPMG Paul Murdock 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 UI Tower? (a) Bedroom facilities are not included, (b) All the units will be much smaller than recommended, according to what I have seen, all "sub-standard." (c) About 30% will be studios (called efficiencies elsewhere), not mentioned by the consultants, and 1/2 to less than 1/2 will be 2 BR, 3 BR, or 1 BR plus studio (HPMG recommends approximately 1/3). (d) Will these much smaller apartments be able to attract the kind of top-rank faculty UI is targeting, "neighbors" who are used to much larger apartments?

HPUC
Hale Kewalo EIS
2/22/93, p. 2

(3) Public Tower.

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)? (b) How large will each type be? (c) Sometimes I have observed that "affordable" rents are not much lower than market rents. Taxpayer dollars, Federal funds, should not be used to subsidize market level rents, thereby competing unfairly with private developers and wasting tax money.

(4) Parking.

(a) With approximately 520 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 is 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 Nuuanu Tower and other high density apartments planned across Palama Street and Kapiolani 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 entering the 590 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 UI Faculty who do not have early classes have spouses who work and 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 (900-1,040) is based on the average household size (1.70-1.90) 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 Palama 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 Palama or Kapiolani Boulevard. The two wide streets provide a buffer.
(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 (such as band practice, athletic practices and events, rallies, carnivals, etc.) in order to reduce the noise impact of the drilling. It is important to state that all tenants will be "require" that they may be exposed to potential noise from the school in their rental agreements. If they do not find the noise worse than they anticipated, they will be expected to be happy with the school's relocation to other areas. Have they been contacted by HDOE 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 (2) effectiveness of the pre-drilling effect on historic McKinley High and (3) effectiveness of the pre-drilling effect on the idea of reducing the number of students and the number of teachers on possible pre-contact sites; (b) Office of Hawaiian Affairs, Chair Claywain, Association of Hawaiian Civic Clubs, Chair H. Brian Keyser, and Ku Lahui Hawai'i, Governor Milliken, Trustee for their comments on possible pre-contact sites; and (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 use by the school to be used exclusively by the tenants of the 530 apartments? I do not refer to Building 957 or to the EFO 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 educational school for the homeless) and then to use that land in the future for educational use 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 cannot be so easily located, but located on many parcels of land; schools cannot be so easily located.

CC: HDOE, Attention: Mr. Harold Edwards, HDOE, Attention: Mr. Karl Matsushita, Oahu, Attention: Mr. Brian J. J. Clay

Ref. No.: HL 159.2

March 29, 1993

Ms. Amy Kimura
1318 Holua Street, Apt. 1002
Honolulu, Hawaii 96822

Dear Ms. Kimura:

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

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

1. Building 957 has already been made available to the school to temporarily house functions requiring immediate relocation. HDOE is also offering additional support in accommodating other functions which may eventually need to be relocated from the building.

2. The report prepared by HMG Peat Marwick entitled "FHU Faculty Housing Assistance Master Plan (1991)" offers a range of recommendations for accommodating faculty housing needs. The FHU is utilizing the land 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 found not 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
day-care facility nearby at HCDA's Kamakau Vista project located at Kawahao and Kamakou 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 Mauka 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 - 600 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 local parking garage at Neal Blaisdell Center where an additional 400-500 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 160-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's 1990 average household size while the high is the figure used by the HCDA for estimating population in the Kakako 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 "within 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 (MIZ-C) and Mixed-Use Residential (MIZ-R) zones, the more restrictive MIZ-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 require tenants that 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.

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 65, Hawaii Revised Statutes (HRS). The current Environmental Assessments and the Environmental Impact Statement presently being prepared for the Male Kaualo project will comply with all requirements for public notification and review pursuant to Chapter 342, HRS. Thus, the parties you mention have been given the opportunity to participate in the EIS process. Neighborhood 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 107 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 (MACS, 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 MACS report.

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. Maunohi
Director of Planning

cc: Mr. Al Anana, HPDC
Mr. Earl Hataiwa, WOA
I am a student at McKinley High School and want you just to see our former PCC Palancar site. It is in a good location because we need it for high school seniors who are in the program called Young Parents Program need a day care center because we had enough money to build a new one. There were also some classes there before we moved and transferred it on 1987. The classrooms at PCC Palancar was not bigger and larger than the Palancar classroom now. I am not sure when we need something for emergencies. We can be near to McKinley High School and it's easy to get a lot easier. For us, we don't have to walk too far. The former PCC Palancar site may be not much but it can give us a great deal of help and use it for Palancar Education, which is another education more than anything and used permanent housing for the young parents Program.

This program is very useful and helpful but teenagers still need that. If we don't have a place to build new buildings Education and Home are the most important things we need at the former PCC Palancar.

Ms. Erlinda G. Gamata
1201 Holua Street
Honolulu, Hawaii 96817

Dear Ms. Gamata:

Re: Hale Kewalo Rental Housing Mixed-Use Development

Environmental Impact Statement
Preparation Notice (EIS/NEPA)
Tax Map Key: 2-3-091
Makaha, Oahu, Hawaii

March 29, 1993

Thank you for your letter of February 20, 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 5/7, the Hale Kewalo project should have no impact at all on this activity. Indeed, should this project proceed, ownership of Building 5/7 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 proceed, use of Building 5/7 and the entire alternate on- or off-campus area may need to be found to accommodate the Young Parents Program.
Ms. Erlinda G. Ganata
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,

[Signature]
Eric J. Masutomi
Director of Planning

CC: Mr. Al Abana, HFD
Mr. Earl Matsukawa, WOA
February 21, 1993

To The Director Finance and Development, HSC

Please do not build housing on the former KCC-Penscola 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 three to four blocks away. The portables will also help because some of the young parents want their pregnancy to be confidential. The KCC portables site is slightly off McKinley and as it will be confidential. Please put serious thought into your decision. Please think about us.

Thank You,
Chantel Yamashita

Ms. Chantel Yamashita
1334 Kamuela St.
Honolulu, HI 96814

March 30, 1993

Ms. Chantel Yamashita

Re: Hale Kealoh Rental Housing Mixed-Use

Development

Environmental Impact Statement

Preparation Notice (EISP) No.

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 Kealoh 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 reallocate the Young Parents Program from its current location in Building 857, the Hale Kealoh 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 Kealoh 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. Chantal Yasashita
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,

[Signature]

Eric J. Masunomi
Director of Planning

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsukawa, WDA
TO: The Director, Housing Finance Development Corp.

2/17/93

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 bare for my child and if I'm able run back to class which interferes with my learning. I would consider nursing my child.

Sincerely,

Joy Ishikawa
94-303 Lupa Pl.
Mililani, Hi 96789

March 29, 1993

Ms. Joy Ishikawa
94-303 Lupa Place
Mililani, Hawaii 96789

Dear Ms. Ishikawa:

Re: Hale Kewalo Rental Mixed-Use Development
Environmental Impact Statement
Preparation Notice (EIS)
Tax Map Key: 3-2-59:1
Houmahu, 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.
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,

[Signature]

Eric J. Masutomi
Director of Planning

Cc: Mr. Al Abana, HFDC
Mr. Earl Matsukawa, MIA
2-19-93

At the District Housing Finance Development Corp.,
right now I am a student at McKinley
High School, and I really feel you should
vote K.C. Johnson for mayor. Right now I
am attending a class called the Young
Parents Program (YPP), which is using the
guidelines we wrote this year. (Dr. YPP used
the principles of the Warsaw KC camps
that year, but in September we learned we
had to write the principles ourselves.)

Taking the class really helps and teaches
us to have a positive attitude. The YPP
needs more classroom space and a place
for the Beyond/Backtob programs to be near the
HHS campus. Having the Backtob program near the Younger
Public Health is very good for
emergency purposes. This would be a good
idea if it were a month
day. If so, it would be better if the YPP
were closer to HHS campus. Well, especially
since it was a drive across the city at night now.

I think the Young Parents Program actually helped
those students who attend the class and don't want to
be seen on school campus. This program really
helped those who are those parents. Right now
these are places to parents to help their
programs. If the program didn't use the
K.C. Johnson property, the new would not get
the help they need. Also, this program tells
their kids to listen to the
families. The program also helps them
cope with their life changes of being
a single parent.

Sincerely,

Anne Johnson

647 Kunawai Ln. #512,
Honolulu, Hawaii 96817
Ms. Avia Cayetano
PL GEN 1.15b.2
March 29, 1993

Ms. Avia Cayetano
447 Ku一流的 Lane, #512
Honolulu, Hawaii 96817

Dear Ms. Cayetano:

Re: Hale Kewalo Rental Housing Mixed-Use Development
Environmental Impact Statement
Preparation Notice (EIS90)
Tax Map Key: 2-2-09-1
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 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 EIS 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.

Very truly yours,

Eric J. Masutani
Director of Planning

cc: Mr. Aihana, HFDC
Mr. Karl Matsukawa, WOA
To the Director Housing Finance Development Corp.

FEB 12, 1993

Please save our 106 Pensacola Site. That land can have great use for McKinley High School. I am a student at McKinley High and am on a Program for Young Parents. Our class is located in Building 857. We can use this portable for our Infant-Toddler program which is now located at a church off campus. This portable will much closer for us to go to than the nursery now, it is also much more convenient for us to pick up our children. Our lack of space and need for nursery space.

Thank you.

Renee Dilayo
146-1 Maluniu Avenue
Kailua, Hawaii 96734

March 29, 1993

Ms. Renee Dilayo
146-1 Maluniu Avenue
Kailua, Hawaii 96734

Dear Ms. Dilayo:

Ref: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISP)
Tax Map Key: 2-3-69:
H ONOLULU, 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.
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,

[Signature]

Eric J. Masutani  
Director of Planning

cc: Mr. Al Ahana, HFDC  
Mr. Earl Matsukawa, WOA
March 29, 1993

Ms. Corrina Cheong
1130 Liliuokalani Ave., #102
Honolulu, Hawaii 96817

Dear Ms. Cheong:

Re: Hale Kewalo Rental Housing Mixed-Use
Development
Environmental Impact Statement
Preparation Notice (EISPN)
Tax Map Key: 2-3-609
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 DOE 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.

Thank you.

Sincerely yours,

Kakako

John M. Weber
City Council Member
Honolulu, Hawaii

March 29, 1993
To the Director, Housing Finance Development Corp.

We need this KCC-PepsiColo property because we don't have any room in McKinley High School and if they tear 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 find some place new to go to we have missed out on all the things we have come to learn. Because the KCC property is very close to McKinley HS, 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. Liliana St. Thank you,
Dorregis Palakino-Hinch

P.S. I have a 11-months old son.
Mr. Danregio 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,

[Signature]

Eric J. Nosutomi  
Director of Planning

cc: Mr. Al Ahana, HFDC  
Mr. Earl Hatsukawa, WOA
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 Kawaiho Rental Housing Mixed-Use Development (TRM 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,

[Signature]

FCA
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. Karl Matsukawa  
Misson Chamise and Associates, Inc.  
P.O. Box 2530  
Honolulu, Hawaii 96811
Ref. No.: FL GEN 1.15b.2

May 26, 1993

Mr. Mieuk Cheung
Director of Engineering
U.S. Army Corps of Engineers
Pacific Ocean Division
Building 230
Fort Shafter, HI 96856-5440

Dear Mr. Cheung:

Re: Hale Kawalo 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,

[Signature]

Eric J. Haselton
Director of Planning

CC: Mr. Al Ahnes, HFDC
Mr. Karl Matsukawa, WOA
Mr. Eric J. Masutomi
Hawaii Community Development Authority
The State of Hawaii
677 Ali 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 a comment.

Sincerely,

[Signature]
State Conservationist

cc: Michael Bajinting, District Conservationist, Honolulu Field Office

---

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,

[Signature]
Eric J. Masutomi
Director of Planning

CC: Mr. Al Abana, HPDC
Mr. Earl Matsuhawa, WOA
Mr. William Meyer  
District Chief  
Department of the Interior  
Geological Survey  
677 Ala Moana Boulevard,  
Room 413  
Honolulu, HI 96813-5412

May 26, 1993

Mr. Eric J. Masutomi  
Director of Planning  
Hawaii Community Development Authority  
The State of Hawaii  
617 Ala Moana Blvd., Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Hale Kewalo Rental Housing Mixed-Use Development, Draft Environmental Impact Statement (DEIS), Honolulu, Hawaii

We are in receipt of the subject DEIS. We regret that due to prior commitments, we are unable to review the DEIS by the May 23rd deadline.

We are returning the DEIS to your office for your future use.

Sincerely,

William Meyer  
District Chief

Enclosure

cc: Mr. Al Abana  
Housing Finance and Development Corporation  
The State of Hawaii  
617 Queen Street, Suite 300  
Honolulu, Hawaii 96813

Mr. Brian J.J. Choy  
Office of Environmental Quality Control  
The State of Hawaii  
250 South King Street, 4th Floor  
Honolulu, HI 96813

Mr. Earl Matsukawa  
Wilson Okimoto & Associates, Inc.  
P.O. Box 2930  
Honolulu, HI 96811
Mr. Eric J. Masutomi  
Housing Finance and Development Corporation  
State of Hawaii  
677 Ala Moana Blvd., Suite 1001  
Honolulu, HI 96813  

Dear Mr. Masutomi:

HALO KENALO 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,

[Signature]

R. K. Keiser  
Lieutenant Junior Grade, CEC, USN.  
By direction of the Commander

Encl:
(1) Draft Environmental Impact Statement

Copy to: (w/o enc1)
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  
320 South King St., 4th Floor  
Honolulu, HI 96813  

Mr. Earl Matsukawa  
P.O. Box 3520  
Honolulu, HI 96811

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: Male Kevalo 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,

[Signature]

Eric J. Masutomi  
Director of Planning

cc: Mr. Al Ahana, HFDC  
Mr. Earl Matsukawa, WOA
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 Yukimoto of the Planning Branch at 588-0488.

Very truly yours,

GORDON MATSUOKA
State Public Works Engineer

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,

GORDON MATSUOKA
State Public Works Engineer

cc: Housing Finance & Development Corporation
Attn: Mr. Al Abane
Office of Environmental Quality Control
Attn: Mr. Brian Choy
Wilson Okumoto & Associates, Inc.
Attn: Mr. Earl Matsuoka

877 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813

588-0488 (voice)
808-588-0499 (fax)
May 17, 1993

Mr. Eric J. Matsuoka
Director of Planning
Hawai‘i Community Development Authority
677 Ala Moana Boulevard, Suite 1002
Honolulu, Hawai‘i 96813

Dear Mr. Matsuoka:

Subject: Hale Keawo 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, which is the only code that has been adopted and is currently being used by the City and County of Honolulu. We agree with your assessment of the project's adherence to the Model Code. Please contact Mr. Howard Wieg at 587-3014 for more information.

Sincerely,

Maui Energy Program Administrator

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 Hawai‘i
333 Merchant Street, Room 110
Honolulu, Hawai‘i 96813

Dear Mr. Kaya:

Re: Hale Keawo Rental Housing Mixed-Use Development Draft Environmental Impact Statement

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 Keawo 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,

Energy Program Administrator

cc: Mr. Al Ahana, HFDC
Mr. Earl Matsuoka, WOA
TO:  Mr. Eric J. Hashimoto  
Hawaii Community Development Authority  

FROM:  Roy C. Price, Sr.  
Vice Director of Civil Defense  

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS), HALE KEOALO  
RENTAL HOUSING MIXED-USE DEVELOPMENT  

Thank you for this opportunity to comment on the DEIS on the Hale Keaolo Rental Housing Mixed-Use Development, Honolulu, Oahu, Hawaii; TKM: 2-3-09; ref. T.  

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. Mal Hashihara of my staff at 734-2161.  

cc: Wilson Okamoto & Assocs.  

Ref. No.: 1.150.2  
May 26, 1993  

Mr. Roy C. Price, Sr.  
Vice Director of Civil Defense  
Department of Defense  
State of Hawaii  
3491 Diamond Head Road  
Honolulu, HI 96816-4495  

Dear Mr. Price:  

Re: Hale Keaolo 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 Keaolo 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 Keaolo 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,  

[Signature]  

Eric J. Masutomi  
Director of Planning  

CC: Mr. Al Hanaa, HFD
Mr. Eric J. Masutomi
Hawaii Community Development Authority (HCDA)
673 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

SUBJECT: Draft Environmental Impact Statement (Draft EIS)
Hale Kawai Rental Housing Mixed-Use Development
Honolulu, Oahu, Hawaii

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:

<table>
<thead>
<tr>
<th>School</th>
<th>Grades</th>
<th>Projected Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kaimuki High School</td>
<td>7-12</td>
<td>95</td>
</tr>
<tr>
<td>Central Intermediate</td>
<td>7-8</td>
<td>62</td>
</tr>
<tr>
<td>McKinley High School</td>
<td>9-12</td>
<td>42</td>
</tr>
</tbody>
</table>

Your assertion that the projections should be lower due to the negligible impact from studio units is not correct. As explained to members of the HCDA staff, the student factors used for the projections included studies 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.

Mr. Eric J. Masutomi
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 Kaimuki 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 Kaimuki 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 increases in students due to Hale Kawai can be accommodated by the remaining capacity at the schools. On the contrary, there are other projects which are mentioned on pages 32-35 which will impact the enrollment of the schools and increase enrollment. Other projects are also in the planning stages. 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 Kaimuki 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 Career 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 standards formulas used for comparison and not on detailed 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.

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER
2) We believe the area should be considered as a location for a new elementary school or for expansion of McNally High District Hauka Area Plan of February, 1990, Indicated on Page would require a maximum of five (5) elementary schools within elementary schools will be necessary. In planning the Hauka Area no options for school sites are being offered or proposed by NCOM to DOE. This site should be an option.

The DEIS document indicates on page 39 of the SIA that "there agencies will need to plan for the future by the DOE has pointed out that we are planning for the future and retaining the area for school requirements. Unless other schools can be provided by NCOM in the Hauka area, the NCOM remains one of the few remaining options. On Page VIII-4 you concede that other educational facilities could share the facilities or replace ETO in the long-term." In addition, NCOM indicated in a March 28, 1993, Honolulu demand toward more affordable housing in Hauka. 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 needs to indicate how the Department of Education's lower draft EIS mention only the Educational Training Opportunities DOE. On Page IV-2, Section 226-25-3(2) should be added. Services and facilities are designed to meet individual 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 as "difficult to mitigate due to the large (1,000 tract, 1,000 (page 4 of letter from Y. Ebisu & Associates). The classrooms insist that if the project becomes a reality, all affected classrooms be provided air-conditioning units by the developer and installation of air-conditioning units should be included. Any noise exceeding Department of Health standards for any other part of the campus should be similarly mitigated.

5) Vibrations from pile driving are projected to provide low risk of structural damage. According to Dr. Ebisu's report (page 4), damage the full repayment of the costs to repair any buildings on the campus, notwithstanding the historical buildings. The assessment report of Nana to Hsiao is also based on assumptions of the type of soil beneath the area and other projects in the area related to the McNally Campus site. The August 28, 1992, letter states "predictions such as those made by Nana to Hsiao or by Y. Ebisu are somewhat judgmental, for site specific conditions will control the transfer of energy from the pile hammers", 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 block will greatly change the views from the campus since there are no high-rise buildings in the McNally campus or on the Nana to Hsiao site. The SIA states on pages 33-40:

"The HBC/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-rise will be a new element. They will diversify the urban landscape by adding a more city-like appearance to the block."

The DOE acknowledges the growth of high-rise buildings around the block and around Peninsula 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 43 that:

"...there will be direct impacts on the existing activities..." On a more regional level, with people 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.
In the section 4.4, the EIS states regarding impacts:

"The proximity between the residential towers and activities of McKinley High School may lead to incompatibility problems. With residents nearby all 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 HCDRA analysis that elementary school sites are needed in the area. Where else can an elementary school site be provided to the DOE in the Kakaako 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 Koa 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 HCDRA'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 HCDRA 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.
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 96806

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 presupposing, 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 middle, and .01 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.

2. 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 high school or for expansion of McKinley High School.

Meanwhile, we are concerned that your comments regarding the HCDA's Kakaako 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.
The Honorable Charles T. Yokouchi  
Page Three  
May 26, 1993

The fact is that since the adoption of the Kakahko 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 Pokahana 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 Kakahko District. Your comments ignore the fact that growth projections for the Kakahko 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 basic 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 scenario 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 progress 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. Unspecialized 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 lower-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, 1990

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 Kapio Lane 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 DOD 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,

[Signature]
Eric J. Masutomi
Director of Planning

cc: Mr. Al Abara, HFDC
Mr. Earl Matsukawa, WOA
Dear Sirs:

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, 1993 and March 12, 1993 (enclosed). We have no further comments to offer at this time.

Very truly yours,

[Signature]

J. C. Lim, M.D.
Director of Health

Enclosure

c: Housing Finance and Development Corporation
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 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 232, Session Laws of Hawaii 1992, formalizes the State's Commitment to use of glassphalt (crushed glass in asphalt) for road paving purposes. This project will be funded by the State, glassphalt should be used for all road paving purposes when practical.

If you should have any questions on this matter, please call Carrie McCabe of the Solid Waste Management at 506-4043.

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 traveling to and from the project site should be minimized within residential areas and must comply with the provisions of DOH Administrative Rules, Chapter 11-43, "Vehicular Noise Control for Oahu."
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 Keewalo Rental Housing Development
Draft Environmental Assessment (EA)

THX: 2-3-92: 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 sewered, 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 sewer.

The sewage system serving the project site is part of a regional system extending from Kailua to Honolulu. 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.

Solid Waste

The discussion in the Draft EA of the solid waste impacts and infrastructure needs of this project are inadequate. A project which will create 330 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 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, every new and existing development should include recycling and waste reduction measures in their design and construction. Waste reduction measures can be reduced through construction and demolition waste. Waste reduction measures and recycling. We also suggest that the occupants of the project be allocated sufficient space for collection of recyclables and other items in their units or in a central area of the 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 (recyclables) 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 Ms. Lori Kajiwara of the Wastewater Branch at 566-4290.

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 11-42, "Community Noise Control for Oahu."

2. Construction activities must comply with the provisions of DOH Administrative Rules, Chapter 11-42, "Community Noise Control for Oahu."
Mr. Harold Edwards
October 22, 1992
Page 3

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 DOT 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,

[Signature]

[Name]
Director of Health

Office of Environmental Quality Control
Wastewater Branch
Office of Solid Waste Management
Noise and Radiation Branch

Ref. No.: PL GEN 1.15b.7
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 Mr. 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 BCOA 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 "glassphalt" for road paving where practicable.

3. Noise

All powered mechanical equipment at the project will be installed to meet allowable noise levels established by DOT rules in Chapter 11-42.
The Honorable John C. Leslie, M.D.

May 27, 1973

Community Noise Control for Ohio. As discussed in the previous letter, the Community Noise Control Act of Ohio will apply to all noise control measures, including Chapter 1144, "Community Noise Control for Ohio." The Act will include provisions that will be similar to those in many other states, including provisions for: (1) the establishment of a community noise control commission, (2) the establishment of a community noise control board, and (3) the establishment of a community noise control agency.

This response, along with your report, will be transmitted to the appropriate state agencies in the consultation phase of the environmental impact

very truly yours,

[signature]

Director of Planning
May 12, 1993

Mr. Eric I. Masunomi
Director of Planning
Hawaii Community Development Authority
679 Ala Moana Boulevard, Suite 1201
Honolulu, Hawaii 96813

Dear Mr. Masunomi:

SUBJECT: Hale Kewalo Rural Housing Mixed-Use Development, Draft Environmental Impact Statement (DEIS)
Honolulu, O'ahu

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 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.

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 woody deposits that might contain information on environmental change. If woody 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 HUBBARD, Administrator
State Historic Preservation Division

TE lek

c Al Abana, Housing Finance and Development Corporation
Brian J.J. Choy, Office of Environmental Quality Control
Ref. No.: PL GEN 1.15h.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 Kekulo 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, 1992 concerning 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,

[Signature]
Eric J. Nacatomi
Director of Planning

cc: Mr. Al Ahana, HUD
Mr. Earl Matsukawa, WOA
Mr. Eric J. Matsumori
Hawaii Community Development Authority
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Matsumori:

Subject: Draft Environmental Impact Statement (DEIS)
Hale Kawalo 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 off-ramps at Ward, Penasco, and Pilikoi Streets, particularly in view of the projected growth of the Kahakuloa redevelopment area.

We would like to suggest that consideration be given to aligning the development’s Penasco Street access with Kamile Street and providing another access point from Kapolei Boulevard for the convenience of the motorists.

Thank you for the opportunity to provide comments.

Rex D. Johnson
Director of Transportation

cc: Mr. Al Alana, HPIC
    Mr. Bryan Luy, OESC
    Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.
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,

cc: Mr. Al Abana, HFDC
    Mr. Earl Matsukawa, WDA
May 17, 1993

Mr. Eric Masutomi
Hawaii Community Development Authority
677 Ali Moana Boulevard, Suite 600
Honolulu, Hawaii 96813

Dear Mr. Masutomi:

Subject: Draft Environmental Impact Statement for the Hale Keawolo
Rental Housing Mixed-Use Development

Thank you for the opportunity to review and comment on the subject document. We have the following comment:

You are correct that the Draft EIS requires further development, specifically, the completion of the economic analysis. We will review the draft EIS and provide comments in the next few weeks.

If you have any questions, please call Jovian Hinojosa at 966-6185.

Sincerely,

Brian J. J. Choy
Director


Ref. No.: PL GEN 115b.2

May 26, 1993

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

Dear Mr. Choy:

Re: Hale Keawolo Rental Housing Mixed-Use Development

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,

Brian J. J. Choy
Director of Planning

cc: Mr. Al Ahana, RFDC

Mr. Earl Matsukawa, WOA
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

May 11, 1993

Ref. No. C-41

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.

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
Director

cc: Housing Finance & Dev. Corp.
   Office of Environmental Quality Control
   Wilson Okamoto and Associates
Ref. No.: PL GEN 1.15b.2

May 26, 1993

The Honorable Harold S. Masunoto
Director
Office of State Planning
State of Hawaii
P.O. Box 3940
Honolulu, HI 96811

Dear Mr. Masunoto:

Re: Hale Kaualo 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 piles 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. Masunori
Director of Planning

cc: Mr. Al Abana, HFDC
Mr. Earl Matsukawa, WOA
April 27, 1993

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

Dear Mr. Marutomi:

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, TMC 2-3-09-01, Pueo 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 Del at 527-5235.

Very truly yours,

KAZU HAYASHIDA
Manager and Chief Engineer

cc: Housing Finance and Development Corporation
Office of Environmental Quality Control
Wilson Ohimoto & Associates, Inc.

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

May 26, 1993

Dear Mr. Hayashida:

Ref. No.: PL GEN 1.115b.2

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,

Eriko Marutomi
Director of Planning

cc: Al Akana, HPDC
Mr. Earl Matsukawa, WOA
April 12, 1993

Hawaii Community Development Authority
The State of Hawaii
877 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 M. MURAOKA
Director and Building Superintendent

cc: J. Harada
Housing Finance & Develop. Corp.
(Al Akana)
Office of Environmental Quality Control
(Brian J. J. Choy)
Milson Chasuto & Assoc., Inc.
(Earl Matsukawa)

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
Director of Planning

cc: Mr. Al Akana, MDC
Mr. Earl Matsukawa, WOA
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 Kealani 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 Kealani 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 523-6368.

Thank you for the opportunity to comment.

Sincerely,

E. JAMES TURSE
Director

cc: Housing Finance and Development Corporation
Office of Environmental Quality Control
Wilson Okumoto & Associates, Inc.

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 Kealani Rental Housing Mixed-Use Development
Draft Environmental Impact Statement (DEIS)
Tax Map Key: 2-1-09-1
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,

[Signature]

Eric J. Masutomi
Director of Planning

cc: Mr. Al Abana, HFDG
Mr. Earl Matsukawa, WOA
May 17, 1993

Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Attention Mr. Eric J. Kasutomi

Gentlemen:

Subject: Draft Environmental Impact Statement for the Hale Kaualo Rental Housing Development,
Tax Map Key 2-3-39: 01
Honolulu, Oahu, Hawaii

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Hale Kaualo 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 Kaka'ako. 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 open space 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 Kaualo Project.

We Add Quality to Life
Ref. No.: FL GEN 1.13b.2

May 26, 1993

The Honorable Walter M. Oawa
Director
Department of Parks and Recreation
City and County of Honolulu
550 South King Street
Honolulu, HI 96813

Dear Mr. Oawa:

Re: Hale Kewalo Rental Housing Mixed-Use Development
Draft Environmental Impact Statement (Draft EIS)
Tax Map Key: 2-3-091-1
Honolulu, Oahu, Hawaii

Thank you for your letter of May 17, 1993 commenting on the subject Draft EIS.

The 1.25-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,

[Signature]

Eric J. Masubari
Director of Planning

CC: Mr. Al Abana, HPDC
Mr. Earl Matsukawa, WOA
April 8, 1993

Mr. Nakatomi
Director of Planning
Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Nakatomi:

Subject: Draft Environmental Impact Statement (DEIS)
Hale Nuvalo Rental Housing Mixed-Use Development

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 522 units. However, we wish to remind you that the Division of Higawmakers Management granted sewer connection approval on February 13, 1993 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 No, Environmental Engineer, at 323-4150.

Very truly yours,

C. Nakatomi
Director and Chief Engineer

CC: Housing Finance and Development Corporation (Al Aho)

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

May 26, 1993

Re: Hale Nuvalo Rental Housing Mixed-Use Development
Draft Environmental Impact Statement
(Draft EIS)

Tax Map Key: 2-7-09: 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 pages 11-9. 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,

[Signature]
Eric J. Hamamoto
Director of Planning

cc: Mr. Al Akana, HFDC
     Mr. Karl Matsukawa, WOA
Mr. Michael N. Scarfones, Executive Director  
Hawaii Community Development Authority  
The State of Hawaii  
177 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
Attn: Eric J. Masutomi

Dear Mr. Scarfones:

Draft Environmental Impact Statement (DEIS) for  
the Hale Kuwalo Rental Housing Mixed-Use Development  
Honolulu, Oahu, Hawaii. Tax Map Key: 2-7-691-1

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) 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.

3. The Final EIS should also discuss alternative designs with respect to our comments of October 2, 1992 which mentioned the use of overhangs, eaves, 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 Nata of our staff at 527-6075.

Sincerely,

[Signature]

ROBIN FOSTER  
Chief Planning Officer

CC: Housing Finance and Development Corporation  
Attn: Al Ahana  
Office of Environmental Quality Control  
Attn: Brian J. J. Choy  
Wilson Okano and Associates, Inc.  
Attn: Karl Matsukawa
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 Kaualo Rental Housing Mixed-Use  
Development  
Draft Environmental Impact Statement  
(Draft EIS)  
Tax Map Key: 2-3-08: 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, it would not be appropriate since they are not applicable to the project site. The proposed project site is located within the Kahaluu Community Development District and is, instead, subject to provisions set forth in the State's Mauka Area Plan and Rules established by the Hawaii Community Development Authority pursuant to Section 206-3, Hawaii Revised Statutes. Discussion of the letter will be included in the aforementioned chapter of the Final EIS as required under Section 21-200-17 (b), 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 8.7, Visual/Open Space.

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 Rental 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 UI Faculty Housing Assistance Master Plan, the University of Hawaii has identified only three available sites, two in the urban core: the proposed site and another in Manoa near Koolau 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 Pauahi Street and Kapili Road. It will also accommodate most of the existing KTO 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
would be practical or in order. Moreover, we note that such an assessment is not required under the provisions of Chapter 345, 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,

[Signature]

Eric J. Kasemoto
Director of Planning

cc: Mr. Al Abana, HFDC
    Mr. Earl Matsukawa, WOA
May 6, 1993

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

By  
EUGENE UMEMURA  
Assistant Chief of Police  
Administrative Bureau

cc: Housing Finance and Development Corporation  
Office of Environmental Quality Control  

---

May 26, 1993

The Honorable Michael Nakamura  
Police Chief  
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,

[Signature]

Eugene Umemura  
Director of Planning

cc: Mr. Al Abana, HFDC  
Mr. Earl Matsukawa, WOA
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 Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 15 wishes to submit comments on the following concerns in regard to Hale Kewalo DEIS:

Impacts on Honolulu Public Schools

Discussion about the impacts on the neighboring school system was inadequate in the DEIS. Data for the DEIS was near the completion of the DOE's needs to have two portable classrooms which are to be built this year at the Kaahumanu Elementary School, and eight classrooms for a new K-2 school in the East Leeward Development. The DEIS might have fixed 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. Island School had sound proofed its new gym to avoid disturbance to its neighbors. Kaimuki 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
Chairman

cc: Hawaii Community Development Authority
Wilson, Quinco and Associates
Councilman Andy Hirakawabi
Senator Carol Puente
Representative Rod Tam
Representative Jim Shishiki

May 26, 1993

Ref. No.: PL GEN 1.15b.2

Mr. John Steelquist
Chair
Makiki/Lower Punchbowl/Tantalus
Neighborhood Board No. 15
City Hall, Room 400
Honolulu, HI 96813

Dear Mr. Steelquist:

Re: Hale Kewalo Rental Mixed-Use Development
Draft Environmental Impact Statement
(Draft EIS)

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 Male Hauula 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,

[Signature]

Eric J. Nakatani  
Director of Planning

cc: Mr. Al Ahana, HEPC  
Mr. Earl Matsukawa, WOA
May 22, 1993

Mr. Eric J. Hasumori
Hawaii Community Development Authority
The State of Hawaii
677 Alabama Boulevard, Suite 1001
Honolulu, Hawaii 96813

Dear Mr. Hasumori:

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 evaluation of the Draft Environmental Assessment report. I was concerned with the possible impact on the National Register site of McKinley High School (50-88-12-9526). 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 Kapilani project site.
   1.1 Realization of vibration effect on structures in the project area.
   1.2 Development of a "high-rise character" of the area.
   1.3 Development of an "historic structure" or "caretaker's cottage" not evaluated in the EA archaeological assessment.

1. Local History: You have documented probable land use by the native Hawaiian in the project site area up to the present day of the 19th century. You have documented the use of the project site for the Kapilani Technical School. There is no information concerning the forty or so years between the two. Information concerning the period from the present day to the 1940's is also not available in subsurface testing. However, information concerning the time period probably would not be available in subsurface testing. You have developed the use of local informants as a source of information. In summary, the summary of the archaeological assessment provided in the EA and included in the EIS without change offers only regional information. The final EIS should include local history developed from local informants.

2. Effect of Vibration: I have two concerns in this area.
   2.1 First, you have indicated possible impact on the historic structures with your intention to monitor the vibrations. Secondly, you have provided "expected" analyses that project a probable effect on a nearby structure and a "low" effect on the historic properties.

Monitoring: You have stated that the pile-driving and 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 your qualified archaeologists or architects are involved with this monitoring.

Vibration Effects: The analysis by B. Eisiev & Associates in Appendix D finds that the historic structures are not impacted. The analysis concludes that the risk of structural damage will be low. The analysis states that the findings are "very low" (Appendix D, page 4). In the EIS text, the findings are described as "extremely low" (V-2 and V-4). I don't know whether the project developers have considered the two words synonymous. I don't know what the difference means. The term is used in terms of possible effect by vibration and difference means that no monitoring is necessary when the air report said "very low".

3. High-rise Character: I have two concerns with this issue.
   3.1 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 criteria of "visual impact."

High-rise character: I see no reason why this area needs a high-rise character in comparison to a low-rise character. In this case, the high-rise character is not needed or will not be needed. The difference is that a "high-rise character" is needed or will not be needed. The concept of "visual impact" is unaddressed in the Draft EIS.

4. 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
Mr. Roy Day
P.O. Box 1122
Woodland, CA 95695

May 21, 1993

Dear Mr. Day:

Thank you for the opportunity to comment on the draft Environmental Impact Statement for the proposed development of the historic districts and the requirement of the California Cultural Resources Survey for the development of the cultural survey of the area. The purpose of this letter is to provide the following comments:

1. Local History: We designed the project to minimize any impact on the historic resources and to ensure that the development is compatible with the historic character of the area. The draft EIS identifies the historic resources that will be affected by the project and provides information on the potential impacts. I have reviewed the EIS and believe that it provides a reasonable basis for determining the need for additional studies.

2. Archaeological Studies: The project will be designed to minimize any impact on the archaeological resources. The draft EIS identifies the potential impacts and provides information on the potential mitigation measures. I have reviewed the EIS and believe that it provides a reasonable basis for determining the need for additional studies.

In summary, I appreciate the opportunity to comment on the draft EIS and the draft Environmental Impact Statement. I believe that the project is well-planned and designed to minimize any impact on the historic and archaeological resources. Thank you for the opportunity to comment.

Sincerely,

[Signature]

Consultant, Cultural Resources Inventory
3. High Rise Character: The high-rise character described on page V-9 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 SHPO 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 impact" 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 V. Ebisu Associates Inc. dated August 6, 1992 (Appendix D).

The SHPO 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 date, the SHPO has not requested a contingency plan for protecting historic property.

Very truly yours,

Eric J. Kasutani
Director of Planning

CC: Mr. Al Abate, HPDC
Mr. Earl Matsuiwa, MOA
May 21, 1993

Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
ATTN: Eric J. Hatsutani

MISDON DIAMOND & ASSO., INC.

Dear Mr. Hatsutani,

On behalf of McKinley High School, I would like to thank you for providing me with a copy of the Hale Iwalo 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 concern, 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, I am certain that students in all of the buildings, including the Administration Building, will be affected. Although this will help, I am certain that students in all of the buildings, including the Administration Building, will be affected. At one point, relocated classrooms are being held in the High School Building, and at another point in the main building. But because of the way the building was constructed (with wood lath and plaster), noise will not only be heard but could be amplified.

As a second statement was made also calls for better defining. In number two of your responses, I would like to know where the construction will be done and when the last bell rings. Adult education classes, extra-curricular activities, and the other activities could last until at least 10:00 p.m. nightly for seven days a week. How will you avoid disruptions at these times? Are these times going to be considered "low demand hours"?

In number five, you admitted that "residential development in the vicinity of McKinley High School will inevitably occur as the Ewa area undergoes redevelopment." By this, I take it that Hale Iwalo is supposed to be only a small part of the total impact from the area. But why should you claim that the area's 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. I would like to know how much right does McKinley have to comment? Who's to tell all of those professors who need to take a break during their stress-free lives not to just go downstairs and out back to run around the track? I've noticed that these are a reminder that even if Hale Iwalo fails through UI, will still go ahead and build on the site anyway. In this case, 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 Ewa?

Upon reviewing the DEIS, we also have several questions.

1) In Appendix C (Traffic Study) of the DEIS, there were two mitigation measures and 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 Pilikoi St. from Kapiolani Blvd. in the morning peak hours. Being that 1) Pensacola St. is one way going inland, Pilikoi St. is one way going towards the freeway, and 3) there are no streets connecting Pensacola St. and Pilikoi St. 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 Pilikoi in order to get to the freeway to get to UI?

2) Also, in Appendix C, it is recommended that on-street parking should be removed from the west-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 kokohead side of Pensacola St. in the block near of the Liholiho St. Surely the elimination of parking doesn't make it that the cars will disappear too. Where will these cars go? Won't the neighborhood be affected?
In Appendix E (Social Impact Study) on page 66 addressing Construction Impacts, it says that "While the temporary disruption of parking, if not properly managed, will negatively impact those who live near the site, the long term addition of parking spaces is positive." Does this mean that there will be parking spaces available to the public in Hale Kaua'i residential parking? Street parking was added to ensure no impact, will these Hale Kaua'i spaces be free too?

3) I would also like to draw attention to the need for UH faculty housing. In the article in the Honolulu Star-Bulletin, 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 was sexual discrimination. How do you know that currently, housing is the most important factor? Did you consider this recent data in the DEIS?

A factor that was not brought up in the DEIS was the effect of two buildings of the height of Hale Kaua'i 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 obstacles between McKinley and the horizon, won't the athletic fields of McKinley's campus be burned to death? I have also heard stories about personally experienced distraction from glass reflection. How will the 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 Naucu 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 my students were attending was to have a chance to voice their own concerns. We appreciate the UH Board of Regents' and VP Hort'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 Ho; how did the press manage to learn the same information that we wanted?

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 UH students indicates that 90% of them do not want UH faculty housing to be built on educational land (HEC/Pensacola site).

The McKinley High School Student Council reaffirms its position against the Hale Kaua'i project on the former site of HECC at Pensacola. We find the answers in the DEIS inadequate and hope that our questions will be studied completely.

Sincerely,

Vanessa Lee
Student Council 1st Vice President
President elect

go: Attn: Al Ahana
Housing Finance and Development Corporation
Attn: Brian J.J. Choy
Office of Environmental Quality Control
Attn: Earl Natekava
Ref. No.: PL G11 1.5b.2

May 26, 1993

Ms. Vanessa Lee
HHS 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 EIIS)
Tax Map Key: 2-3-99-1
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.

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 B) 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 342, 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 HI-1 freeway. This route goes makai on Penaulani Street, across Kapiolani Boulevard, left on Waialae 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 not be available for use by the 600, potentially by McKinley High School. This far exceeds the 13 to 15 spaces of on-street parking that will be lost. It should also be noted, based on our traffic engineer's informal observations, those who park on Punahou Street apparently have destinations near the Kapalama 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 Punahou and Wildam Streets, where a 140-space public parking lot is currently located. Parking demands in the general area will be further addressed by the planned area expansion of the municipal parking garage at Neal Blaisdell Center where an additional 400-500 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 14 of the Social Impact Assessment (Appendix A), 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 living 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 Na'auo Towers. This will minimize glare problems.
Ms. Venessa Lee
May 26, 1993

The above statement is by high school student. I am currently in the consultation phase of selecting a subject for my school. I would be interested in your feedback on this decision. Your response will be included in the final edit.

Very truly yours,

[Signature]

cc: Mr. R. Lamb, B.S.E.E., W.A.

[Signature]

President, Department of Planning
May 20, 1993

Wesley Nakatani, AIA, Inc.

Hawaii Community Development Authority
The State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
Attn: Eric J. Nakatani

Dear Mr. Nakatani:

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 Waiehu Rental Housing Project Environmental Impact Statement.

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 "historical" used in reference to the custodial cottage that is made of the main parking lot on the Peninsula entrance of McKinley High School? We note that a site plan shows the cottage is missing from the drawings. Our custodian lives there. Why have you eliminated it from the plans?

In item 2, your attempt 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 Waiehu 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 and stable does it exist? Why is there a "may not be related" clause in the concern about the air quality which exists and whether it will further deteriorate with the advent of the many occupants and cars they drive if the Waiehu project is built adjacent to McKinley? Are the health and safety of the 2000-3000 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 tower of the Waiehu 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 express from Hono via the freeway is on Pensacola Street? Are you stating that the University of Hawaii faculty who would reside in the Waiehu project would not use the freeway to and from work? Where is a traffic study to validate your claim in light of the concentrated "work force" in the faculty tower of Waiehu? Do you have any traffic studies 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 Waiehu Project which is in process and proposed for this area? Isn't this type of cumulative study necessary to see the total effect of any project on traffic and other environmental concerns?
Item #1 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 Explorlani side and the Ring Street entrance. Furthermore, we will remember that when SCC 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 Kauao project have to prevent their guests, tenants and users of services provided at ETO from parking at McKinley?

Item #2 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-used tennis courts. One would be naive to think that persons living in the Hale Kauao 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 you, 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 Kauao project away from this historic institution of learning.

Sincerely,

Teachers at McKinley High School

Vickee Simpson
Charlie Lopes
Allen Wynn
Don Long
Olive Cox
Ralph Leal
Theresa Bauer
Mary Abe
Irwin Jones
Barbara Begor
Alan Litt
Alice Guest
Jean Ackley
Bruce Wilson
Bryan Alcan
Ann O'Leary
Charlie McJames
Sylvia Chels
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: Haleiwa Mental 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

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.

This 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 Haleiwa project will have "no effect" on Site 9926. In assessing the visual impact of the project on the historically significant portion(s) 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 6A, 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 carbon dioxide (CO2) 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 (i.e., vehicles producing more CO since they are not moving around and dispersing emissions), meteorological conditions (wind-speed) and road geometry (how close pedestrians are to the roadway).
Because of the replacement of older vehicles with newer vehicles over time, even if traffic volumes were to remain the same, the models predict that emission rates will decrease significantly over time. Because traffic generated by the Hale Kewalo project is proportionally small, in relation to the large volume of existing traffic, the increase only slightly, if at all. It was anticipated that there would be negligible delay time and the 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 have changed significantly over the decades that such data has been collected.

Based on comments received, we understand that the problem you refer to is a localized one in one of your buildings. Since the traffic study was prepared in May 1992, the traffic counts used as the baseline were from 1991. Contrary to your perception, historic traffic data on the Panacela and Kapilama 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 Kapiolani and Kapiolani during peak traffic hours was that Hale Kewalo-generated traffic would account for less than 1 percent of the existing peak hour traffic at the 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 conduct the formal traffic assessment. 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 Kelapa Falls area is changing toward a denser urban environment. It is envisioned in the HDCP's Master Plan. It is realized 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 HDCP's minimum standards for off-street parking. Beyond providing adequate parking, we are already encouraging the police to enforce street parking restrictions, with little that can be done to control this behavior. If non-school related parking individual actions 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 to 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 Field Service, we do suspect that any wear on the existing track from limited, shared use by the public probably pairs in comparison to that caused by the annual use of 150,000 people over a ten-day period during annual Farm Fair. With respect to McKinley's tennis courts, it is our understanding that the courts cannot be used 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.
May 20, 1993

Hawaii Community Development Authority
State of Hawaii
677 Ala Moana Boulevard, Suite 1001
Honolulu, Hawaii 96813
ATTN: Mr. Eric Masumoto

Dear Mr. Masumoto,

Subject: Dole Kealohi Rental Housing Development As Planned For The Center of Kapolei Boulevard And Punalu Street

Draft Environmental Impact Statement Concerns

At first we were happy to hear that the decision to document 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 to 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 the proposed rental buildings.

1. We had asked that consideration be given to alternative uses (short and long term) for the site which 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 activity on a highly central and very public activity oriented city block. It appears that this request was inherently taken to mean that “every conceivable use” be considered as a means of avoiding the key issues. We hope that this will not be the case and ask specifically that the long term identified potential of the site be addressed with regard to the specific identified need (identified by the HCDA for just the Mauna Area alone) for five elementary schools in the Mauna 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 Mauna Area Plan identifies two sites as possible schools, Punalu’u and the former KCC campus. The Plan does not suggest that KCC should not be closed so that these sites are available. The Plan notes the next priority as elementary education and not faculty housing. How is it that the mere presence of the KCC education and not faculty housing makes it so that the Plan notes the next priority? Even if the EIS is not to be completed, part of the site should be committed to the education needs in the area.

2. We had noted that the site is the logical choice for temporary classrooms while the McGonigle Administration Building (Building A) is reconstructed. We understand that Building B is not able to house all users of Building A. Why demolish and 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, in Aloha). 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 consider the site to be a limited use as both public and recreational does not work for the community. The open space recreational area next to Kapolei be locked at from a use ability stand point? For example, is it big enough for a basketball 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 usability of the site plus the fact that the Mauna 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 or omitted from 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 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 site 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 channelized 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. Redevelopment 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 equals to an equivalent alternate cost to the construction proposed when the land opportunity cost is included? Faculty retention would probably be greater if they had the 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? It was claimed in a March 28, 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 loose 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 objectively 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 Island and the Island 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 Island School Campus. Why is this clear and direct social concern given only minimal attention?

8. We have expressed concerns 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 not they included in the DEIS? What about the growth in areas beyond Kalakaua? Growth in the adjacent areas impact the schools and other facilities in Kalakaua. 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 Pokaiaina 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 827? How limiting the total loss be?

11. We have expressed concern over the 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. 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 attract 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 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? In the DEIS it is not clear to us that the poor condition of Building A was taken into 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 HCIA. This means that the entire block can be used for other Hale Kawaiola. What does "Public" really mean?

15. Would it be possible to substantially reduce the need for new UH Mānoa 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 Mānoa? How will housing in Kākakako 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 PTAPTA and the 11,000+ signatures we submitted to the Governor asking that Hale Kawaiola be relocated. 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-upper 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 Kawaiola, 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 Kākakako, 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 Kedocks
Mckinley PTSA President

Patricia Yamamoto
Principal, McKinley High School

H. J. Chan
K. T. Higa
M. Higa

Attachment
cc: Office of Environmental Quality Control
   Attn: Mr. Brian J. J. Choy
   Attn: Mr. Earl Matsuzawa
   Housing Finance and Development Corporation
   Attn: Al Ahana
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 and a half million dollars for the Hale Kewalo Project on the former McKinley High School/KCC Penrose 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: Pohukalena & the Linekona school sites. It is evident by these decisions 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 Order or by any 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.

Ref. No.: PL 89-15b.2

May 26, 1993

Mr. Paul Kadooka, et al.

HHS PTA 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: 4-3-09: 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 continuous innuendo in your comments of impropriety on the part of the EIS preparers. HDCA has never attempted to "circumvent" the EIS process. Our decision to proceed with the preparation of an EIS was a matter of expediency 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
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 denied 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 Makua 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 the grounds of the present Kahoolawe 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 EIS provides the type of vocational training program which the Makua Area Plan states should be retained on the RNC 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 the 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 in no way has not sought to conduct such a needed assessment. As discussed in the Social Impact Assessment (Appendix E), NCUA's latest projections indicate a

likely 2010 population in Makaha of 22,700 generating approximately 9,500 students (grades K-6;
7-8; 11-12; 2281 based on DOE estimates). This assumes realization of approximately 43 percent of the gross maximum buildout capability 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 we have discovered "bias or project advocacy" in the Hale Kewalo EIS when compared to the Kaneohe 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 the agencies, the consultant, and the subconsultants have used the EIS to advocate any viewpoint regarding the project. Rather, all parties have made an effort to examine all sides of the issue 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.

The EIS is intended to address the impacts associated with the Hale Kewalo project, including 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, the 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.
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 an 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 Manuka 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 EIS provides the type of vocational training program which the Manuka 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 DOE 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 Hanauma of 22,700 generating approximately 300 students (grades K-8: 549; 7-8: 115; and 9-12: 228) based on DOE estimates. This assumes a utilization of approximately 45 percent of the gross maximum student 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 Hele Kauilo EIS when compared to the Pawa'a 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 Hele Kauilo project.

2. The EIS is intended to address the impacts associated with the Hele Kauilo 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 those discussed in the EIS which entails use of the
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 Ali 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 Kapolei 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 Kealolo project provides significantly more park/open space than required under HCDA Waikiki 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-phased 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. 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 SIA. In implementing the University 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 Moanalua 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 Kealolo 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 Kealolo project. Even without the Hale Kealolo project, someone (perhaps less qualified than one the Hale Kealolo 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 University Faculty Housing Assistance Master Plan has six components:
   - Information/Counseling assistance and program administration;
   - University rental housing;
   - Mortgage assistance;
   - Downpayment assistance;
   - Housing allowance assistance; and,
   - University for-sale housing.

The proposed Hale Kealolo 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.
6. We find it perplexing that you "could not find such specific inputs from the community in the SIA." Section 5 of the SIA, which runs from pages 52 through 64 fully discusses community issues related to the development of Hale Bewalo. As explained in that section, community issues are people's problems, issues change over time, as people's priorities and values change. Community issues represent opinion, and the SIA presented issues in the project-related to (1) the competition between the proposed project and educational needs; (2) the historic and visual impacts; (3) the impact on non-educational public facilities and services. These issues represent a full range of concerns related to the project as of March 1982.

One possibility for your comments is that you prefer the SIA to use another methodology for preparing the SIA. We infer that you wanted the SIA to prepare a comprehensive report as it does not. We correspond with the community, literature and media research. We have been using informal interviews and focus groups in its issues analysis, such techniques are unnecessary for Hale Bewalo. As discussed on pages 52 and 53 of the SIA, the resource materials included (1) responses to the EIS Preparation Draft EA, (2) responses to the EIS Preparation Draft EA, (3) responses to the EIS Preparation Draft EA, (4) media articles and reports, (5) miscellaneous material. These materials 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 clearly recognize the need for positive 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 SIA, and it is clear that there is a potential problem. We disagree that including another case study would alter this finding.

8. The RCDA has participated in ongoing communication with the DOE regarding the educational needs of the district. We too would be very much interested in realistic alternatives to meeting education demands. We would have encouraged the DOE to formulate a long-range strategy. The RCDA has also sought the student enrollment projections for areas beyond the district. This information, if it were available, would be valuable for more accurately assessing the impact of the Hale Bewalo 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 alternative 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 unmet 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. It is not the DOE's responsibility to provide a realistic alternative to the project. Capacity information was 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 proposed plans at present, the area DOE has not specific plans for a new school. Please refer to our response No. 1 regarding the assessment of alternative uses.

11. The UN faculty members who will live on-site will not have "above average incomes," as you repeatedly
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 4.2.3 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.

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 in the noise study. This is a 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 (55B-025 AHA) in the noise study.

As we have stated before, the Hale Kewalo project as proposed is in compliance with HCDA's Hauai 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 Hauai 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 development parameters. These factors, pursuant to Section 15-22-40 of our Hauai Area Rules, are determined by applying the provisions associated with the adjacent land use zone.

Item 14 was omitted in your letter.

We fail to see how this comment is relevant to the Draft EIS for the Hale Kewalo 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 dealing" as you allege; the process was straightforward and legal.

Regarding discussions of social impacts of this matter, please read Section 4.4.4.4 of the SIA. On pages 45 through 47, we discuss project impacts on the expansion of McKinley High School.

As mentioned earlier, the latest HCDA/DOE projections indicate that by the year 2010 approximately 300 students (grades K-6: 569; 7-8: 228) will originate in the Hauai 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 Hauai have not generated discernably greater amounts of public
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 Halse Keele 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,

[Signature]

Eric J. Masutomi
Director of Planning

cc: Mr. Al Abara, HFRC
Mr. Earl Matsukawa, WOA
Ms. Patricia Hangmoto, MHS
State Representative Suzanne N.J. Chun
State Representative David M. Hagino
State Representative Kenneth Hiraki
State Representative Rod Tam
State Representative Marie Hirano
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 unhealth condition that exists in the McKinley High School science building. Indeed, the problem has been assessed by the proper authorities and is in line with 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 fumigating 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
Chair, Science Department

C.C. HADC
Wilson Okamoto and Associates, Inc.
Office of Environmental Quality Control

Ref. No.: PL GEN 1.15b.2
May 26, 1993

Ms. Barbara Rogers
Chair
HHS 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,

[Signature]
Eric J. Masutani
Director of Planning

cc: Mr. Al Ahana, HADC
Mr. Earl Matsukawa, WOA
Mr. Eric J. Hamutoni  
Hawaii Community Development Authority  
The State of Hawaii,  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  

Dear Mr. Hamutoni:

Thank you for providing me a copy of the draft Environmental Impact Statement (DEIS) on the Hale Kaualo Rental Housing Mixed-Use Development projected for the former site of the ECC Campus at Punchbowl Street (Tax Map Key 2-5-0-01-13).  

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 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 Kake'ako" prepared by the former staff of the Hawaii Community Development Authority. On page 3 there is an article on McKinley High School as a historical/educational resource in Kaka'ako area. 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 Kaualo consistent with the stated 1983 position on McKinley High School? Has HCCD 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. Punchbowl, Kapalolani 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 Kaualo project is built?  

You note in the first paragraph of item 2 that "...much locations are not identifiable an important scenic view points or view corridors." What criteria was and is used to make such a determination about McKinley? By whom was it made and who made their 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 HCCD's sense of "public view"? No doubt the approximately 9,000 graduates of McKinley High School and their families have the public view that the entire campus is the vista of McKinley High School. Would HCCD consider building twin towers on the grounds of Iolani Place even in the corners of the grassy area? Would the vista of the Palace be compromised?  

In item 3, the social impact of Hale Kaualo 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 students of the Royal Iolani have continued to complain as much that the students of Iolani have charged 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 HCCD 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 Kaualo 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 Kapolei Boulevard. We know from past history when KCC was adjacent to the parking lot at Peninsula, that the Hale Kewalo tenants and the KCC users 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 taxpayers 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 the 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 may 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 HDOA's standards?

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 cannot 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 optimum education for their handicapping condition? What will HDOA do to not interfere with their federal and state rights to an accessible 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?"The 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 DEIS consider use of this site at all?

While I recognize that Governor Wallace 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 6857 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 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 space. 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 Kaualo 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. 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 effect of the Hale Kaualo project on the social, economic, cultural and education aspects of the community, how can it be accurate to have utilized an EIS for Kakaako which was done in 1983, almost 10 years ago? Will you be making a more realistic study of the cumulative effect of the Hale Kaualo Project in relation to all of the projects in the Kakaako District as well as the district that McKinley High School serves including the Paua and Superblock on Keeaumoku 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/economic/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 Kaualo. 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 corroborate that fact. I continue to believe that the Hale Kaualo 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 "local" and that persons having to do with McKinley High School. The Save McKinley Coalition's petitions show quite and opposite picture. Of the over 12,000 signatures, approximately 4 of 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,

Galie 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.
Malama Kaka'ako
Malama... caring for, taking care of

RAYMOND H. SUEFUJI RETIRES AS HCDA EXECUTIVE DIRECTOR

After completing nearly 35 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 19 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...
Ms. Gail A. Sykes  
Aia Waikiki 911  
300 University Avenue  
Honolulu, HI 96826

May 26, 1993

Dear Ms. Sykes:

Re: Hale Kewalo Rental Housing Mixed-Use Development  
Draft Environmental Impact Statement  
(Draft EIS)  
Tax Map Key: 2-3-03: 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, seismic monitoring will be conducted during test pile driving to determine the appropriate pile driving rates and methods. The purpose is to prevent 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 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 were designated as a historic site. Unfortunately you are apparently operating under the misapprehension that the campus in its entirety has been determined to be historically significant. This is not the case. The portion of the McKinley High School listed on the National and State Registers of Historic Places, identified as Site 9526, is confined to the Quadrangle area, the Commercial Building, the Home Economics Building, the Marion McFarland Scott Auditorium, the Senior Core Building, and the Fred Wright Swimming Pool (Figure V in 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 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 (SHPO), has affirmed our finding in its assessment that the Hale Kewalo project will have "no effect" on Site 9526. In evaluating the visual impact of the project on the historically significant portions of the high school, it is our understanding that the SHPO considered a number of factors, including the location and intervening distance of the project with respect to Site 9526, the relative height of the proposed towers, and the overall potential of the project to impact on the educational and architectural significance of Site 9526.

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 - Paniolo - 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 Makua Area Plan, which establish Paniolo Street, Kapiolani Boulevard, Ward Avenue, and King Street as "view corridors" protected by yard and corner setback controls. The references also take into consideration the analysis included in the Final Environmental Impact Statement for the Kakakako Community Development District Plan (June...
1983), which identified the vistas from Kapolei Boulevard looking north 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 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 recreation 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 use on the existing track from limited, shared use by the public is not comparable to that caused by the estimated 100,000 people that attend the 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 locationual 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 parking 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 Hand 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
of convenience for tenants. It encompasses 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.

12. 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.

13. 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.

14. Executive Order 3567 sets aside the property to the HCDA for housing and other purposes consistent with Chapter 208E, Hawaii Revised Statutes. As mentioned earlier, the site is not considered historically significant. The project includes public education uses.

15. These questions should be directed at the HCDA. The conditions site are not caused by the project.

16. 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 B) was prepared in March 1993 and addresses the cumulative social, economic, cultural, and educational aspects 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 Hailei 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 B), 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 Haleiwa. 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. Matsunaga
Director of Planning

cc: Mr. Al Ahana, HCDA
     Mr. Earl Matsukawa, WOA
Hale Kawalo DHEIS May 22, 1993 Page 2

been cited as a reference that way. I WOULD LIKE THE DETAILS
ON THE 93 SITES ANY WAY.

5. Regarding Alternate Uses: Why does DHE need "definitive
planes" for the site? In DHE Superintendant Toguchi’s 9/4/92
comment for the Hale Kawalo Draft Environmental Assessment,
he states, "There is no feasible elementary school to develop
in the Kakako area. The Pohukaina site is too small...unless
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(ES).

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 Kawalo is not sensitive to the McKinley
High Community, School, and Historic Site.

7. Hawaii Revised Statutes Chapter 20E states 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 Kawalo is contrary to the Mauka Area Plan.

8. The Mauka Area Plan, created by NCDA, 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 47,960
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 and 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 Kawalo site
for an elementary school to serve the entire Mauka Area of 450
acres.

If Hale Kawalo is built, this leaves only Kaa'ahumanu
Elementary which is outside of the Mauka Area to serve the Mauka
Area. Kaa'ahumanu is already at maximum (745) and is planning
to have two portables on campus next year. An official admits
It is undesirable but feels caught between the need for classroom space and the limited outdoor space. There are not accepting any geographic exceptions except kindergarteners with siblings at the school.

9. If the Pawa's Superblock is built, where will the additional 150 K-3 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's site? (The Pawa's project has been reduced in size. I do not have the revised school estimates.)

Hale Kewalo and the Pawa's Redevelopment are only two of the many potential projects to be planned for the area, Kakaʻako and the Alaiai-Sheridan Special Area.

If multi-track year-round schools are approved by teachers and their unions, this can alleviate some overcrowding. And it has yet to be approved and tried on O'ahu.

10. STA'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 logic it can be argued that every parcel in the MAP has no detailed, specific plan can be used for other (zoning) purposes.

11. We are aware that it is not the responsibility of UN 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 HRC). I feel HCDA is not carrying out its duty with respect to this site. The map was created in 1984 by the State Legislature to be capable of 'long-range planning and implementation of improved development' (HRC 2086).

12. The Kamehameha State Plan has taken a stand against the project in support of saving the land (although this is not saving for the land).

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 education, including UH's ETO and adult education for education, including UH's ETO and adult education for education, including UH's ETO and adult education (7/9/22 letter to DOE for Draft H Plan, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua, High Pua).

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 (11)).

15. The HCDA/McKinley/KCC superblock is zoned "public" and has a height limit of 60 feet (which HCDA can but should not override).

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 rezoning or some sort of special permit?

18. The Alaiai-Sheridan Special Area has general height limits of 150 feet. It is bounded by Kapiolani Blvd., Nuuanu, Kakaako, Kapiolani Boulevard, and Pali Highway. Its heights are lower than the proposed residential tower and it is even adjacent to McKinley; it is across Kapiolani, a side thoroughfare.

19. Impacts on immediately adjacent uses, Resident-School compatibility, The SIA found that "residentschool 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 Soliani and Manoa High Schools.

a. Soliani'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 complaints. As one official said, it is not that easy to remove your First Amendment rights. Soliana tried to be a good neighbor and at great expense air conditioned the gym to reduce the noise (although this is not saving for the land).)

b. The gym team, like all good swim to the students' dismay. The swimming pool, like all good swim to the students' dismay.

1. The Hale Kewalo DEIS may 22, 1993.
and private schools are now exempt from the noise code between 7 a.m. and 10 p.m., the carnival would not be excepted 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 exhuberance after a game or practice.

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 practice, usually 6:30-8:30 p.m. on weekdays, plus Sunday practice. The neighbors complain as well when the school fertilizes 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 Fair would not be excepted and Moanalua complaint 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 Moanalua-McKinley High six would be an optimal use of the land "PROVIDING that the various uses can operate compatibly;" the SIA says, "it follows that it is not an optimal use of the land.

Even SIA asserts that the "active opposition is mostly local."

I disagree 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 care, and for because they feel passionately that this would be a grave and permanent error greatly affecting Moanalua 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 came from all walks of life. Present and former senator, business people, high school dropouts, entertainers, athletes, professionals, a legislator from a far-away district. We written letters or spoke at meetings supporting our position.

c. The State PTA has supported us for close time. At the recent PTA 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 the petitions at the fair, shopping centers, and carnivals live all over Oahu. 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 them are some McKinley alumni who privately agreed with our position. The vast majority of people, over 90%, who were informed about Moanalua supported our views.

The support has been 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. In these cases there were obtained in 60 days! Had we met our goal, Moanalua would not be excepted with more varied students had more time a greater number and people of different 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-Kakaako Neighborhood Board Arch. It's failure to pass a motion to delay funding for Moanalua until there is a public hearing was held implied little support for us. The vote was 1-2 in favor of us. We were told after with a UI professor and one member against us. The president of the university being very friendly with PDA. The reasons that the board voted compatibly. If they voted compatibly they would have had to hold a public hearing.

The two absent members had told us before the meeting of her. The one absent member had told us that there had been full support for any or no vacancies the son and the son would undoubtedly have carried a majority of the board membership being carried, a majority of those voting, necessary rather than a majority of those voting.

g. DOE and DBO. I find the characteristics of the DOE as not taking a formal position of objection or support. It's "formal position of neutrality", and DOE's not taking an "explicit" position "regarding support or opposition" to be
distortions. (1) In a letter from DOE Chair Nakasone to BLNR Chair Pacy, the DOE makes clear it was misled in agreeing to the 1/30/92 tripartite agreement for Building 857 and 50 stalls because DOE believed BLNR controlled the land. DOE not only reassessed that agreement but stated it would proceed to reclaim the entire parcel for educational purposes (1/22/92). (2) Describing the DOE as “neutral” because it did not join in the DOE Chair Hartman explained that members did not want to be held personally liable for legal expenses by joining in the suit at that point (Hawaii Star-Bulletin 12/11/92). (3) In my response of 2/22/93 to the HIRN, I did not state EXPLICITLY that I opposed the project on that site. But would any reasonable, 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 PUE, principal, faculty, and Alumni Association have been actively involved in trying to prevent Hale Kewalo from being built on the former KCC-Penhaentsa site.

b. McKinley Community School is for adults age 18 and older, has classes in the evenings, 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,” passing the issue to Hale Kewalo.

c. Both the High School and Community School are under the DOE.

22. Because the sub-consultant, consultant, and NCD are unaware of or pretend to be unaware of the distinction between HHS and NCD, 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 use of 857 by the Community School on a permanent basis. 857 is being used temporarily by the Board of Education, and the Environmental Assessment.

23. McKinley High is at capacity. Even before Building A became unsafe for classrooms 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.

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 to see an accurate SIA can be done. NCD based its 3/29/93 reply to Rep. Thilen on this partly incorrect statement.

25. Traffic.

a. Regarding peak-hour traffic in the morning and evening, I find NCD’s 3/29/93 concerns to be unsatisfactory. The “trip generation rate” for only the “affordable” units in Phase II of the P Expand project is 25-30% in the morning peak hour and 32% in Phase I. The 1010 “affordable” units in Phase I and Phase II are being considered. The 315 vehicles entering and exiting during the morning peak hour and 364 vehicles exiting during the evening peak hour. This is not a major market such as Palerm, reducing the need for auto trips for other purposes, further reducing the number of auto trips, has lower trip generation rates than P Expand. (7/7/93) and 7/7/93 compared to 24% and 31% for P Expand. It makes no sense.

b. Also, the realities of life on O'ahu are that faculty members whose CLASs schedules would allow them to choose 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 some distortions due to insufficient research or lack of in-depth, 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 ENO is "currently" operating on-site. The SIA was prepared March 1993. Following page 11 and Fig. VII are photos. The caption of the fourth photo reads: "A concrete, two-story building presently used by ENO. To be demolished." My understanding is that ENO vacated the site last summer (1992). 29. The SIA describes sub Area 4 as "bounded by Heretonia Street." This conflicts with the map in Fig. A. and the first paragraph of 2.1. Which is correct?

29. The SIA says Building A "currently houses McKinley High School's auditorium and some classrooms. It makes no mention of administrative offices.

30. On page 38 the SIA describes a "church and school complex" on Pensacola near King Street. "Pensacola" implies an elementary school. Isn't it only a pre-school? If so "pre-school" should be specified.

31. On page 45 McKinley's service area is said to include Makiki. I think it has been some years since that was so. It is now 'Kalani' High's area.

32. On page 45 McKinley's service area is said to include Makiki. I think it has been some years since that was so. It is now 'Kalani' High's area.

33. Now has each of the parties mentioned in my 2/22/93 comment on the RISPA been given the opportunity to participate in the...
projects. One bedrooms are the smallest units recommended by the consultant even for the high-rise apartment building.

The types, numbers, and sizes of units in the UI Tower are as follows: 78 studio apartments in sizes from 410 to 473 square feet; 84 one-bedrooms at 555 to 592 square feet; 90 two-bedrooms at 783 to 824 square feet. As can be seen, these units are too small for the consultant's recommendation. It will be difficult to retain young mainland faculty. At the University of Massachusetts at Amherst, for example, a state university like UI, 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 UI and/or Moa 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.

36. Under Long-Term Commitment of Land, Irreversible and Irretrievable Commitment of Resources, I findIncomplete the statement, "If the need for faculty housing declines, then both towers could be used for general rental housing." Where in the DoE is it stated that the Board of Regents decided, based on the housing consultant's recommendation, that other UI 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 DSIS. 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
McKinley High Parent

xc; Mr. Eric Hasutani, Hawaii Community Development Authority
Mr. Earl Matsukawa, Wilson Okamoto and Associates, Inc.

Ref. No.: PL GEN 3.15b.2

May 26, 1993

Ms. Amy Kimura
1216 Heeia 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 overall 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 in fact 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 to the respective order of your comments:

1. The level of project detail available when an EIS is prepared varies from project to project. Section 11-120-17 (e) (5) (Administrative Rules, DOE) 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
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
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 Koolau 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 Kapolei 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.

Amy Kimura
Page Three
May 28, 1993

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.

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
SELECT 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 HDFC. 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 Haleiwa 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
included in Section 206K-33, HRS. Nonetheless, the Hale Kewalo project is not inconsistent with this guideline or with HDBA's Hauka Area Plan (Note: A discussion of the project's relationship to the Hauka Area Plan is included in the Final EIS in Chapter IV, Relationship to Plans and Policies). While the Hauka Area Plan recognizes the potential value of the site for educational purposes, it is in use of the site for housing, recreation and no way suggests that the site should be restricted exclusively for such uses. The HDBA 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 Hauka Area Plan, it is important not to overlook its basic intent and purpose. As stated on page 5 of the Plan:

The Hauka 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 Hauka Area (emphasis added).

The residential population figures that you have drawn from the Hauka 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 Hauka Area is much less. Current trends support this position; our latest projections indicate a likely 2010 population in Kakaako of 22,700 generating approximately 1800 students (grades K-12) 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.

9. The comments on the Pauoa 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 Pauoa 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 Pauoa are only two of the various proposed projects.

Regarding multi-track year-round schools, we agree that it cannot solve "all overcrowding." That is why 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. 69, "DOE has no specific plans for the former KCC site" is made out of context and is irrelevant to the referenced analysis. Discussion is part of Section 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.
CORRECTION

THE PRECEDING DOCUMENT(S) HAS BEEN REPHOTOGRAPHED TO ASSURE LEGIBILITY. SEE FRAME(S) IMMEDIATELY FOLLOWING.
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 113, 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 on the Mauka Area is much less. Current trends support this position; our latest projections indicate a likely 2010 population in Kaaawa of 27,700 generating approximately 900 students (grades K-6, 56%; 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 Kaaawa still needs to be reconciled with related information on future demand outside of the Kaaawa 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 Study Area. Such a comprehensive plan is needed regardless of the status of Hala Kealolo 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 Pauoa redevelopment project would be more appropriately directed to the DOE since the Draft EIS is intended to address concerns of the Hala Kealolo project only. The answer to your question regarding where the Pauoa 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 Kahuamu Elementary.

We acknowledge that Hala Kealolo and Pauoa 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 FCC site" is made out of context and is irrelevant to the referenced analysis. The discussion is part of Section 5.2.1, 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.
At no time does the SIA imply that the lack of plans for the site "means the site cannot be used for other purposes." Instead, the SIA states 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 (siting) purposes" is totally inappropriate.

11. With respect to your concerns regarding HCOA's responsibilities, please refer to our response to Item Nos. 7 and 8.

12. We acknowledge the position taken by the Hawaii State PTA.

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. HCOA'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 listed in application to the City's Land Use Ordinance. They are not interchangeable with terminology utilized in HCOA'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 Mauka 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. 62-64) 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.
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, is still present and continues to originate within groups directly related to McKinley High School, presumably because the issue focuses on the relationship between McKinley High School and Kalewa. The petition and lawsuit are generated by school-related groups and individuals.

20f. Regarding the position of the Ala Moana/Kakaako Neighborhood Board, No. II, the SIA accurately presented the results of the February 1992 meeting. That is, 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 DOE and DOE positions, terms such as “formal position” are used to characterize positions resulting from voting. The SIA accurately reported DOE positions in a chronological manner on pages 55 and 56. In terms established by the Institute for Traffic Research data from the Institute for Traffic Research, such as the DOE positions of the DOE position, we note that the DOE stated that the DOE opposed the proposal in September 1992, as most recently, expressed a preference for the no-action alternative.

21. We and our consultants are very much aware of the distinction between McKinley High School and 22 McKinley Community School for Adults. As you point out, both operations are under the DOE. Unfortunately, you fail to recognize that the manner in which space in Building 857 is ultimately utilized and allocated rests solely with the DOE, and that it is entirely within the 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.

23. This comment assumes that the Kalewa 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 46,000 square feet potentially available for use by the school. The 35,000 square feet of new space proposed under the McKinley High School Campus Development Report—potentially available for use by the school.
26. 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.

26. 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 judgment 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 assumptions 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 consultants 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 EVD 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 Noll's III 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 assessment, EIS preparation notice, and draft EIS were prepared in compliance with all requirements for public notification and review pursuant to Chapter 342, 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 RCE portables. In order to assure the availability of the units by the start of the new school year, HCDA had proposed to coordinate and oversee 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 (3/14/90) estimated the median household size for Kakako 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 buildout parameters for the District (see our earlier response to item Nos. 7 and 8). Our ongoing review of actual densities experienced in Kakako 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.
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 UN 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 Kāwalo 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 Kāwalo 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 UN 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.
5-21-93

Gentlemen:

Enclosed are my reasons for opposing the Hela Kauelo housing project which were not fully addressed in the EIS.

Malama,
Bonnie S. Okuma
Meikinley Alumnae


They claim that historically and documented evidence show that the grounds formerly deeded to the school shall be utilized for educational purposes. The Department of Education permitted the use of a portion of the campus to the then Kapolei 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 Kapolei 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 prior formal hearing, it was announced that two high rise apartment buildings would be built "immediately on the campus. Imagine what this would do to the on-going school activities..."
Dear Sirs/Madams,

Re: Hale Kamao Rental Housing Development
Draft Environmental Impact Statement
Tax Map Key: 2-3-0911
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 2 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 Kamao 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 facility 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

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 outlaws 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 2030, 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,

Ian I. Harris

Copy to:
Housing Finance and Development Authority
Office of Environmental Quality Control
Hilton Oka & Associates, Inc.
Ref. No.: PFGEN 1.15b.2

May 26, 1993

Mr. Ian I. Harris
1244 A Alewa Drive
Honolulu, HI 96817

Dear Mr. Harris:

Re: Mala Nuiwai 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 pointing out
the subject Draft EIS. We offer the following
responses in the respective order of your comments:

1. We concede 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 G) 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
G). 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 C. Impact on the
Supply of Faculty Housing Units, and in the Social
Impact Study (Appendix G). 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 Kaimuki near Moanalani 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 5.3 and 5.4 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
1867) 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
recreational 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 25,700
generating approximately 900 students (grades K-6:
48; 7-8: 115; and 9-12: 228) based on DOE
destimates. 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
Study Area. Such a comprehensive plan is needed regardless of the status of Hale Kekaha 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,

[Signature]

Eric J. Harutunian
Director of Planning

cc: Mr. Al Ahana, HDFC
Mr. Earl Matsukawa, WOA
Hale Kewalo
Rental Housing Mixed-Use Development

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
Walter Leong and Associates
Wilbur Smith and Associates
Y. Ebisu and Associates
Hale Kewalo
Rental Housing Mixed-Use Development

References


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.


APPENDICES

A..........FLOOD STUDY

B..........ARCHAEOLOGY STUDY

C..........TRAFFIC STUDY

D..........ACOUSTIC/VIBRATION STUDY

E..........SOCIAL IMPACT STUDY
APPENDIX A

FLOOD STUDY
ESTIMATE OF COASTAL FLOOD ELEVATION

U.H. - KAKAAKO PROJECT
(Former site of Kapiolani Community College)
TMK:2-3-09:1 (PORTION)

Prepared by:
April 8, 1992

References:


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:

<table>
<thead>
<tr>
<th>Profile</th>
<th>SR Model Scenario</th>
<th>SW Model Scenario</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MLLW Elev.</td>
<td>MSL Elev.</td>
</tr>
<tr>
<td>47</td>
<td>6.6'</td>
<td>5.8'</td>
</tr>
<tr>
<td>48</td>
<td>5.0'</td>
<td>4.2'</td>
</tr>
</tbody>
</table>
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)
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 Chiogjeji, 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
<table>
<thead>
<tr>
<th>Figure</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Figure 1</td>
<td>Portion of USGS 7.5 Minute Series Topographical Map, Honolulu Quadrangle, showing Study Area</td>
<td>2</td>
</tr>
<tr>
<td>Figure 2</td>
<td>Tax map showing study area</td>
<td>3</td>
</tr>
<tr>
<td>Figure 3</td>
<td>Portion of 1817 map by Otto von Kotzebue with translations (in parentheses) and general location of Kewalo region [from Fitzpatrick 1988]</td>
<td>9</td>
</tr>
<tr>
<td>Figure 4</td>
<td>Portion of 1884 map (tracing) by S.E. Bishop</td>
<td>12</td>
</tr>
<tr>
<td>Figure 5</td>
<td>Portion of 1897 map by M.D. Monsarrat</td>
<td>17</td>
</tr>
<tr>
<td>Figure 6</td>
<td>Photograph of Kewalo - ca. 1890 - view toward Punchbowl (B.P. Bishop Museum Archives)</td>
<td>18</td>
</tr>
<tr>
<td>Figure 7</td>
<td>Photograph of Sheridan Street area - ca. early 1900s - view ewa (B.P. Bishop Museum Archives)</td>
<td>19</td>
</tr>
<tr>
<td>Figure 8</td>
<td>Portion of 1910 map by Walter E. Wall</td>
<td>20</td>
</tr>
<tr>
<td>Figure 9</td>
<td>Portion of 1922 Fire Control Map by U.S. Army Corps of Engineers</td>
<td>22</td>
</tr>
<tr>
<td>Figure 10</td>
<td>1931 aerial photograph (Hawaii State Archives)</td>
<td>23</td>
</tr>
<tr>
<td>Figure 11</td>
<td>Photograph - ca. 1933 - by Ray Jerome Baker showing Pensacola Street, about one block mauka of Kapiolani Boulevard (Bishop Museum Archives)</td>
<td>24</td>
</tr>
<tr>
<td>Figure 12</td>
<td>1952 aerial photograph of Honolulu</td>
<td>26</td>
</tr>
</tbody>
</table>
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 ‘eua-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'uanu 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 wrestling 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 Puaaliili, makai of the old road, and
extended as far as the west side of the sands of Apuakehau. Within it was Helumoa where Kaahumanu mo 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'ii'lli 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: 1, 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 cocoanut 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 luxuriance 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'uanu 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 Kamehameha... 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 Kau... 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 Whytetee, 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 Rurich, who had visited O'ahu the previous year. The map shows taro lo'i (the rectangles) massed around the streams descending from Nu'uanu 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 Kewslo 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 Kawaiaha'o 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 Honolulu" (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 Piliokai, 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 "Kalua", 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 Konchikis 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 Puua is recorded as consisting of three fish ponds and a houseslot.
LCA 1604 to Pahiha (Pahika on the 1884 map) comprised a houseslot, pond and salt
bed.

Testimony for LCA 1903 to Lolohi (Lolopi on the 1884 map) explicitly defines the
general area:

Peka W.[wohine] 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, Kuniae and others own them. Makai - Gov't road. Honolulu - Peka
Kaula, Lilea, Bolabola, Pue.

Claimant rec'd this land from his father who died last year and held it
a long time back in Kinua's time. (Foreign Testimony, Vol.3: 220)

LCA 9549 to Kaholomoku comprised "three ponds, a salt mo' o" (Native Register,
Vol.4: 477).

LCA 10483 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'.

13
It consists of some kalo patches mauka and some Lokos makai.

The kalo patches are bounded mauka by Kealoha; bound Waikiki side by Kualipaka'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 'awa 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 1885. 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 Lihikona School. The school building and grounds are presently the site of
HONOLULU
HAWAIIAN ISLANDS

Scale 1000. Feet = 1. Inch
M.D. Monsarrat Surveyor
1897

Figure 5  Portion of 1897 map by M.D. Monsarrat
Figure 6  Photograph of Kewalo - ca. 1890 - view toward Punchbowl (B.P. Bishop Museum Archives)
Figure 7  Photograph of Sheridan Street area - ca. early 1900s - view eua (B.P. Bishop Museum Archives)
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 'awa 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.
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 Piikoi 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'akaukukui 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 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 Ti, 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 Liliuokalani 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 Liliuokalani 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:d)

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


<table>
<thead>
<tr>
<th>Author</th>
<th>Title</th>
<th>Publisher/Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>I'i, John Papa</td>
<td>Fragments of Hawaiian History as Recorded by John Papa I'i.</td>
<td>Honolulu: Bishop Museum Press.</td>
</tr>
<tr>
<td>Indices</td>
<td>1929</td>
<td>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.</td>
</tr>
<tr>
<td>Kotzebue, Otto von</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Menzies, Archibald</td>
<td>1920</td>
<td>Hawaii Nei 128 Years Ago. Honolulu.</td>
</tr>
<tr>
<td>Vancouver, George</td>
<td>1798</td>
<td>A Voyage of Discovery to the North Pacific Ocean, and Round the World...Performed in the years 1790-1795. London: Robinson and Edwards.</td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>SECTION</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1-1</td>
</tr>
<tr>
<td>INTRODUCTION</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>2-1</td>
</tr>
<tr>
<td>EXISTING CONDITIONS</td>
<td></td>
</tr>
<tr>
<td>Roadway System</td>
<td>2-1</td>
</tr>
<tr>
<td>Traffic Conditions</td>
<td>2-1</td>
</tr>
<tr>
<td>Traffic Counts</td>
<td>2-1</td>
</tr>
<tr>
<td>Level of Service Concept</td>
<td>2-2</td>
</tr>
<tr>
<td>Existing Levels of Service</td>
<td>2-2</td>
</tr>
<tr>
<td>3</td>
<td>3-1</td>
</tr>
<tr>
<td>PROPOSED PROJECT</td>
<td></td>
</tr>
<tr>
<td>Trip Generation</td>
<td>3-1</td>
</tr>
<tr>
<td>Trip Distribution and Assignment</td>
<td>3-2</td>
</tr>
<tr>
<td>4</td>
<td>4-1</td>
</tr>
<tr>
<td>FUTURE CONDITIONS</td>
<td></td>
</tr>
<tr>
<td>Anticipated 1994 Conditions Without The Project</td>
<td>4-1</td>
</tr>
<tr>
<td>Anticipated 1994 Conditions With The Project</td>
<td>4-2</td>
</tr>
<tr>
<td>Impact of Reversal of One-Way Street Operation</td>
<td>4-3</td>
</tr>
<tr>
<td>5</td>
<td>5-1</td>
</tr>
<tr>
<td>CONCLUSIONS AND RECOMMENDATIONS</td>
<td></td>
</tr>
<tr>
<td>Project Mitigation Measures</td>
<td>5-1</td>
</tr>
<tr>
<td>Other Potential Improvements</td>
<td>5-1</td>
</tr>
</tbody>
</table>

Table of Contents
ILLUSTRATIONS

FIGURE

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

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.
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 assessed 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**
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

<table>
<thead>
<tr>
<th>INTERSECTION</th>
<th>AM PEAK HOUR</th>
<th>PM PEAK HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Delay</td>
<td>V/C</td>
</tr>
<tr>
<td>Kapiolani/Pensacola</td>
<td>12</td>
<td>.61</td>
</tr>
<tr>
<td>Kapiolani/Piikoi</td>
<td>11</td>
<td>.63</td>
</tr>
</tbody>
</table>

(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.*


**Figure 2-4**

LEVEL OF SERVICE CONCEPT DIAGRAM
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

<table>
<thead>
<tr>
<th>PROJECT COMPONENT</th>
<th>TYPE OF UNIT</th>
<th>NUMBER OF UNITS</th>
<th>RATES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>AM PEAK</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>TO</td>
</tr>
<tr>
<td>Apartment Complex</td>
<td>Apartments</td>
<td>529</td>
<td>0.08</td>
</tr>
<tr>
<td>Vocational School</td>
<td>Parking Space</td>
<td>52</td>
<td>0.58</td>
</tr>
<tr>
<td>Remaining Building</td>
<td>Parking Space</td>
<td>86</td>
<td>0.58</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>PROJECT COMPONENT</th>
<th>AM PEAK HOUR</th>
<th></th>
<th>PM PEAK HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>TO SITE</td>
<td>FROM SITE</td>
<td>TOTAL TRIPS</td>
</tr>
<tr>
<td>Apartment Complex</td>
<td>40</td>
<td>120</td>
<td>160</td>
</tr>
<tr>
<td>Vocational School</td>
<td>30</td>
<td>5</td>
<td>35</td>
</tr>
<tr>
<td>Remaining Building</td>
<td>50</td>
<td>5</td>
<td>55</td>
</tr>
<tr>
<td>TOTAL PROJECT</td>
<td>120</td>
<td>130</td>
<td>250</td>
</tr>
</tbody>
</table>

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 Hall 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

<table>
<thead>
<tr>
<th>DIRECTION/STREET</th>
<th>AM PEAK HOUR</th>
<th></th>
<th>PM PEAK HOUR</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>TO SITE %</td>
<td>FROM SITE %</td>
<td>TO SITE %</td>
<td>FROM SITE %</td>
</tr>
<tr>
<td></td>
<td>No.</td>
<td>No.</td>
<td>No.</td>
<td>No.</td>
</tr>
<tr>
<td>Ewa: Kapiolani Blvd</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>40</td>
<td>52</td>
<td>34</td>
<td>51</td>
</tr>
<tr>
<td>King St</td>
<td>25</td>
<td>30</td>
<td>25</td>
<td>31</td>
</tr>
<tr>
<td>Mauka: Piikoi St</td>
<td>9</td>
<td>12</td>
<td>9</td>
<td>14</td>
</tr>
<tr>
<td>Pensacola St</td>
<td>30</td>
<td>36</td>
<td>36</td>
<td>45</td>
</tr>
<tr>
<td>Kokohead: Kapiolani Blvd</td>
<td>19</td>
<td>23</td>
<td>12</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>22</td>
<td>29</td>
<td>12</td>
<td>15</td>
</tr>
<tr>
<td>King St/Local</td>
<td>6</td>
<td>7</td>
<td>8</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>14</td>
<td>8</td>
<td>10</td>
</tr>
<tr>
<td>Makai: Piikoi St</td>
<td>17</td>
<td>20</td>
<td>16</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>18</td>
<td>23</td>
<td>16</td>
<td>20</td>
</tr>
<tr>
<td>TOTAL TRAFFIC</td>
<td>100</td>
<td>120</td>
<td>100</td>
<td>125</td>
</tr>
<tr>
<td></td>
<td>100</td>
<td>130</td>
<td>100</td>
<td>125</td>
</tr>
</tbody>
</table>
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 Naura 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
Table 4-1
FUTURE ANTICIPATED LEVEL OF SERVICE CONDITIONS WITHOUT THE PROJECT

<table>
<thead>
<tr>
<th>INTERSECTION</th>
<th>AM PEAK HOUR</th>
<th></th>
<th>PM PEAK HOUR</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Delay</td>
<td>V/C</td>
<td>LOS</td>
<td>Delay</td>
</tr>
<tr>
<td>Kapiolani/Pensacola</td>
<td>13</td>
<td>.65</td>
<td>B</td>
<td>24</td>
</tr>
<tr>
<td>Kapiolani/Pikoi</td>
<td>12</td>
<td>.68</td>
<td>B</td>
<td>23</td>
</tr>
</tbody>
</table>

(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

<table>
<thead>
<tr>
<th>PROJECT COMPONENT</th>
<th>WITHOUT PROPOSED PROJECT</th>
<th>WITH PROPOSED PROJECT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM Peak Hour</td>
<td>PM Peak Hour</td>
</tr>
<tr>
<td></td>
<td>To</td>
<td>From</td>
</tr>
<tr>
<td>Apartments</td>
<td>40</td>
<td>120</td>
</tr>
<tr>
<td>Vocational School</td>
<td>30</td>
<td>5</td>
</tr>
<tr>
<td>Existing Building to Remain</td>
<td>50</td>
<td>10</td>
</tr>
<tr>
<td>Buildings to be Removed</td>
<td>85</td>
<td>20</td>
</tr>
<tr>
<td>TOTAL TRAFFIC</td>
<td>135</td>
<td>25</td>
</tr>
<tr>
<td>CHANGE IN TRAFFIC</td>
<td>-15</td>
<td>105</td>
</tr>
</tbody>
</table>
Figure 4-4
FUTURE TRAFFIC VOLUMES WITH PROJECT
P.M. PEAK HOUR

000 Total Traffic
(000) Project Traffic
Included in totals
FUTURE CONDTIONS

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 Kapilani 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

<table>
<thead>
<tr>
<th>INTERSECTION</th>
<th>AM PEAK HOUR</th>
<th></th>
<th>PM PEAK HOUR</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Delay</td>
<td>V/C</td>
<td>LOS</td>
<td>Delay</td>
</tr>
<tr>
<td>Kapilani/Pensacola</td>
<td>15</td>
<td>.68</td>
<td>C</td>
<td>26</td>
</tr>
<tr>
<td>Kapilani/Pilikoi</td>
<td>12</td>
<td>.69</td>
<td>B</td>
<td>24</td>
</tr>
</tbody>
</table>

(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 makua 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/Pilikoi 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.
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 Kamaili Street should be eliminated to improve the sight distance for vehicles exiting Kamaili 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 Kamaili 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

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th></th>
<th>Westbound</th>
<th></th>
<th>Northbound</th>
<th></th>
<th>Southbound</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>2&lt;</td>
<td></td>
<td>&gt; 4</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Volumes</td>
<td>565</td>
<td>150</td>
<td>45</td>
<td>2000</td>
<td>10.0</td>
<td>11.0</td>
<td>14</td>
<td>10.0</td>
</tr>
<tr>
<td>Lane Width</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RTOR Vols</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signal Operations

Phase combination 1  2  3  4  5  6  7  8
EB  Left  Thru  Right  Peds
    *      *      *      *
WB  Left  Thru  Right  Peds
    *      *      *      *
NB  Left  Thru  Right  Peds
    *      *      *      *
SB  Right  Thru  Right  Peds
    *      *      *      *

Green  65P  25P  3.0  5
Yellow/A-R  5
Lost Time  3.0
Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

<table>
<thead>
<tr>
<th>Lane</th>
<th>Group</th>
<th>Mvmts</th>
<th>Cap</th>
<th>Adj Sat</th>
<th>Flow</th>
<th>v/c</th>
<th>Ratio</th>
<th>g/c</th>
<th>Ratio</th>
<th>Delay</th>
<th>LOS</th>
<th>Delay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB</td>
<td>TR</td>
<td>3130</td>
<td>2097</td>
<td>0.38</td>
<td>0.67</td>
<td>5.6</td>
<td>B</td>
<td>5.6</td>
<td>B</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB</td>
<td>LT</td>
<td>6433</td>
<td>4310</td>
<td>0.55</td>
<td>0.67</td>
<td>6.7</td>
<td>B</td>
<td>6.7</td>
<td>B</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB</td>
<td>L</td>
<td>1439</td>
<td>389</td>
<td>0.58</td>
<td>0.27</td>
<td>25.6</td>
<td>D</td>
<td>28.3</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>T</td>
<td>3315</td>
<td>895</td>
<td>0.74</td>
<td>0.27</td>
<td>27.7</td>
<td>D</td>
<td>28.3</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>R</td>
<td>1297</td>
<td>350</td>
<td>0.77</td>
<td>0.27</td>
<td>32.1</td>
<td>D</td>
<td>32.1</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Intersection Delay = 12.3 (sec/veh)  Intersection LOS = B
Intersection: KAPIOLANI BLVD. and PENSACOLA ST
Time period:

PENSACOLA ST

SB TOTAL
1100

285 600 215

[D][D][D]

2000 WB TOTAL

45

KAPIOLANI BLVD.

0^ 0 0

EB TOTAL
715

150

1

1 ———> [B]

1 ———> [B]

LOS

[B]

[0] ———> 1

[0] ———> 3

NB TOTAL
**HCM: SIGNALIZED INTERSECTION SUMMARY**

**Center For Microcomputers In Transportation**

---

**Streets:** (E-W) KAPIOLANI BLVD.  
(N-S) PIIKOI STREET

**Analyst:** VIJAY SINHA  
**File Name:** KAPIAMEX.HC9

**Area Type:** Other  
**Comment:** EXISTING CONDITIONS

---

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th></th>
<th>Westbound</th>
<th></th>
<th>Northbound</th>
<th></th>
<th>Southbound</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>2</td>
<td>&lt;</td>
<td></td>
<td>&gt; 4</td>
<td>&lt;</td>
<td></td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Volumes</td>
<td>740</td>
<td>40</td>
<td></td>
<td>65</td>
<td>1920</td>
<td>225</td>
<td></td>
<td>125</td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td></td>
<td></td>
<td>10.0</td>
<td></td>
<td></td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td>RTOR Vols</td>
<td>0</td>
<td></td>
<td></td>
<td>0</td>
<td></td>
<td></td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

---

**Phase combination 1**

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Signal Operations**

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Intersection Performance Summary**

<table>
<thead>
<tr>
<th>Lane</th>
<th>Group</th>
<th>Mvmts</th>
<th>Cap</th>
<th>Adj Sat Flow</th>
<th>V/C</th>
<th>g/c</th>
<th>Ratio</th>
<th>Delay</th>
<th>LOS</th>
<th>Approach: Delay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB</td>
<td>TR</td>
<td>3290</td>
<td>2138</td>
<td>0.40</td>
<td>0.65</td>
<td>0.65</td>
<td>6.4</td>
<td>B</td>
<td>6.4</td>
<td>B</td>
<td></td>
</tr>
<tr>
<td>WB</td>
<td>LTR</td>
<td>5954</td>
<td>3870</td>
<td>0.66</td>
<td>0.65</td>
<td>0.65</td>
<td>8.5</td>
<td>B</td>
<td>8.5</td>
<td>B</td>
<td></td>
</tr>
<tr>
<td>NB</td>
<td>L</td>
<td>1409</td>
<td>409</td>
<td>0.32</td>
<td>0.29</td>
<td>0.29</td>
<td>21.3</td>
<td>C</td>
<td>22.7</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>T</td>
<td></td>
<td>4972</td>
<td>1442</td>
<td>0.55</td>
<td>0.29</td>
<td>0.29</td>
<td>23.1</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R</td>
<td></td>
<td>1515</td>
<td>439</td>
<td>0.11</td>
<td>0.29</td>
<td>0.29</td>
<td>19.8</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Intersection LOS = B**

---

**Cycle Length:** 100 secs  
**Phase combination order:** #1 #5
INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PIKIOI STREET
Time period:

PIKIOI STREET

SB TOTAL
0

< 0
<< 0


225

1920 WB TOTAL

65

< 2
< 1

[B]

KAPIOLANI BLVD.

EB TOTAL
780  740

< 40
<< 40

125 680 45

1 3 1

850 NB TOTAL
HCM: SIGNALIZED INTERSECTION SUMMARY
Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST
Analyst: VIJAY SINGH File Name: FMEX.HC9
Area Type: Other 4-3-92 PM
Comment: EXISTING CONDITIONS

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th>Westbound</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L  T  R</td>
<td>L  T  R</td>
<td>L  T  R</td>
<td>L  T  R</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>4    &lt;</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Volumes</td>
<td>2150 265</td>
<td>1000</td>
<td>275 745 210</td>
<td></td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>11.0</td>
<td>14.0 10.0 14.0</td>
<td></td>
</tr>
<tr>
<td>RTOR Vols</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>30</td>
</tr>
</tbody>
</table>

Signal Operations

Phase combination 1  2  3  4  5  6  7  8
EB Left
Thru *           NB Left
Right
Peds *

WB Left
Thru *           SB Left *
Right *
Peds *

NB Right
EB Right

SB Right
WB Right

Green 65P
Yellow/A-R 5
Lost Time 3.0

Cycle Length: 100 secs Phase combination order: #1 #5

Intersection Performance Summary

<table>
<thead>
<tr>
<th>Lane Group</th>
<th>Adj Sat</th>
<th>v/c Ratio</th>
<th>g/c Ratio</th>
<th>Delay</th>
<th>LOS</th>
<th>Approach Delay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mvmts</td>
<td>Cap</td>
<td>Flow</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EB TR</td>
<td>6437</td>
<td>4313</td>
<td>0.65</td>
<td>0.67</td>
<td>7.6</td>
<td>B</td>
<td>7.6 B</td>
</tr>
<tr>
<td>WB T</td>
<td>3374</td>
<td>2261</td>
<td>0.49</td>
<td>0.67</td>
<td>6.3</td>
<td>B</td>
<td>6.3 B</td>
</tr>
<tr>
<td>SB L</td>
<td>1439</td>
<td>389</td>
<td>0.74</td>
<td>0.27</td>
<td>30.5</td>
<td>D</td>
<td>34.0 D</td>
</tr>
<tr>
<td>T</td>
<td>3315</td>
<td>895</td>
<td>0.92</td>
<td>0.27</td>
<td>37.3</td>
<td>D</td>
<td></td>
</tr>
<tr>
<td>R</td>
<td>1297</td>
<td>350</td>
<td>0.54</td>
<td>0.27</td>
<td>25</td>
<td>D</td>
<td></td>
</tr>
</tbody>
</table>

Intersection Delay = 13.9 (sec/veh) Intersection LOS = B
INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PENSACOLA ST
Time period:

SB TOTAL 1230
< 210 745 275

PENSACOLA ST

1 2 1
< < <
[D][D][D]

1000 WB TOTAL
< 0

1000
0

[B] ← 2

-----------------------------
LOS
[B]

-----------------------------
KAPIOLANI BLVD.

EB TOTAL 2415
< 2150

265

0

0

NB TOTAL
### 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  
**Comment:** EXISTING CONDITIONS

---

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th>Westbound</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>&gt;4</td>
<td>&lt;</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Volumes</td>
<td>130</td>
<td>2230</td>
<td>65</td>
<td>735</td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>10.0</td>
<td></td>
<td>10.0</td>
</tr>
<tr>
<td>RTOR Vols</td>
<td>0</td>
<td>0</td>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>

---

**Signal Operations**

<table>
<thead>
<tr>
<th>Phase combination</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB Left</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green</td>
<td>55P</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yellow/A-R</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost Time</td>
<td>3.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Cycle Length:** 100 secs  
**Phase combination order:** #1 #5

---

**Intersection Performance Summary**

<table>
<thead>
<tr>
<th>Lane</th>
<th>Group:</th>
<th>Cap</th>
<th>Adj Sat</th>
<th>Flow</th>
<th>V/c</th>
<th>Ratio</th>
<th>g/c</th>
<th>Ratio</th>
<th>Delay</th>
<th>LOS</th>
<th>Approach:</th>
<th>Delay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB</td>
<td>LTR</td>
<td>5486</td>
<td>3127</td>
<td>0.90</td>
<td>0.57</td>
<td>17.2</td>
<td>C</td>
<td>17.2</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB</td>
<td>TR</td>
<td>3220</td>
<td>1835</td>
<td>0.55</td>
<td>0.57</td>
<td>10.5</td>
<td>B</td>
<td>10.5</td>
<td>B</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB</td>
<td>L</td>
<td>1409</td>
<td>521</td>
<td>0.54</td>
<td>0.37</td>
<td>19.7</td>
<td>C</td>
<td>24.2</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>T</td>
<td></td>
<td>4972</td>
<td>1840</td>
<td>0.87</td>
<td>0.37</td>
<td>25.8</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R</td>
<td></td>
<td>1515</td>
<td>561</td>
<td>0.38</td>
<td>0.37</td>
<td>17.7</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Intersection Delay = 18.5 (sec/veh)**  
**Intersection LOS = C**
INTERSECTION DIAGRAM

Intersection: KAPIOLANI BLVD. and PIKOI STREET
Time period:

PIKOI STREET

SB TOTAL
0

0 0 0

LOST
[C]

1
2
1 [C]

KAPIOLANI BLVD.

EB TOTAL
2425

2230

65

130^
BCM: SIGNALIZED INTERSECTION SUMMARY
Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST
Analyst: VIJAY SHERA File Name: COLAWOUT.BCD
Area Type: Other
4-3-92 AM
Condition: CONVENTIONAL WITHOUT PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th>Westbound</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L  T  R</td>
<td>L  T  R</td>
<td>L  T  R</td>
<td>L  T  R</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>2 &lt; 4</td>
<td></td>
<td>1 2 1</td>
<td></td>
</tr>
<tr>
<td>Volumes</td>
<td>587 170</td>
<td>51 2092</td>
<td>226 667 300</td>
<td></td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>11.0</td>
<td>14.0 10.0 14.0</td>
<td></td>
</tr>
<tr>
<td>FTPG Vols.</td>
<td>0</td>
<td></td>
<td>0</td>
<td>30</td>
</tr>
</tbody>
</table>

Signal Operations

<table>
<thead>
<tr>
<th>Phase combination</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green</td>
<td>65P</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yellow/L-R</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost Time</td>
<td>3.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Cycle Length: 100 secs Phase combination order: 1 5 6 7 8

Intersection Performance Summary

<table>
<thead>
<tr>
<th>Lane Group</th>
<th>Adj Sat</th>
<th>v/c</th>
<th>g/c</th>
<th>Ratio Ratio Delay</th>
<th>LOS</th>
<th>Delay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>L</td>
<td>3124</td>
<td>2093</td>
<td>0.40</td>
<td>0.67</td>
<td>5.7</td>
<td>B</td>
<td>5.7</td>
</tr>
<tr>
<td>LT</td>
<td>6247</td>
<td>4249</td>
<td>0.58</td>
<td>0.67</td>
<td>7.0</td>
<td>B</td>
<td>7.0</td>
</tr>
<tr>
<td>L</td>
<td>1439</td>
<td>389</td>
<td>0.61</td>
<td>0.27</td>
<td>26.3</td>
<td>D</td>
<td>30.7</td>
</tr>
<tr>
<td>T</td>
<td>3315</td>
<td>895</td>
<td>0.82</td>
<td>0.27</td>
<td>30.5</td>
<td>D</td>
<td></td>
</tr>
<tr>
<td>R</td>
<td>1297</td>
<td>350</td>
<td>0.61</td>
<td>0.27</td>
<td>35.1</td>
<td>D</td>
<td></td>
</tr>
</tbody>
</table>

Intersection Delay = 13.3 (sec/veh) Intersection LOS = B
BCM: SIGNALIZED INTERSECTION SUMMARY
Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD.  (N-S) PIIKOI STREET
Analyst: VIJAY SINGH  File Name: KAHALOOU.B09
Area Type: Other  4-3-92 AM
Comment: CUMULATIVE WITHOUT PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th>Westbound</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>2</td>
<td>&lt;</td>
<td>4</td>
<td>&lt;</td>
</tr>
<tr>
<td>Volumes</td>
<td>771</td>
<td>42</td>
<td>68</td>
<td>1998</td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td></td>
<td>10.0</td>
<td></td>
</tr>
<tr>
<td>Peds Vol</td>
<td>0</td>
<td></td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

Phase combination 1  2  3  4  5  6  7  8
EB Left  Thru  *  NB Left  *  Thru  *
Right  *  Right  *  Peds  *
Peds  *  Peds  *
WB Left  *  SB Left  *
Thru  *  Thru  *
Right  *  Right  *
Peds  *  Peds  *
NB Right  Thru  *
SB 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: F1 F5

Intersection Performance Summary

<table>
<thead>
<tr>
<th>Lane</th>
<th>Group</th>
<th>Adj Sat</th>
<th>V/c</th>
<th>%/c</th>
<th>Approach:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Norms</td>
</tr>
<tr>
<td>EB</td>
<td>TR</td>
<td>3290</td>
<td>2138</td>
<td>0.42</td>
<td>0.65</td>
</tr>
<tr>
<td>WB</td>
<td>LTR</td>
<td>5882</td>
<td>3823</td>
<td>0.70</td>
<td>0.65</td>
</tr>
<tr>
<td>NB</td>
<td>L</td>
<td>1409</td>
<td>409</td>
<td>0.37</td>
<td>0.29</td>
</tr>
<tr>
<td>T</td>
<td>4972</td>
<td>1442</td>
<td>0.65</td>
<td>0.29</td>
<td>24.3</td>
</tr>
<tr>
<td>R</td>
<td>1515</td>
<td>439</td>
<td>0.11</td>
<td>0.29</td>
<td>19.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Intersection Delay = 12.1 (sec/veh)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Intersection LOS = B</td>
</tr>
</tbody>
</table>
**BCM: SIGNALIZED INTERSECTION SUMMARY**

Center For Microcomputers In Transportation

Streets: (E-W) KAPILANI BLVD.  (N-S) PENSACOLA ST

Analyst: VIJAY SENHA  File Name: COLPWR099.BC9

Area Type: Other  4-3-92 PM

Comment: CUMULATIVE WITHOUT PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th>Westbound</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>4 &lt;</td>
<td>2</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Volumes</td>
<td>2236</td>
<td>330</td>
<td>234</td>
<td>897</td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>11.0</td>
<td>14.0</td>
<td>14.0</td>
</tr>
<tr>
<td>RTOR Vols</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>30</td>
</tr>
</tbody>
</table>

**Signal Operations**

<table>
<thead>
<tr>
<th>Phase combination</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Intersection Performance Summary**

<table>
<thead>
<tr>
<th>Lane Group</th>
<th>Adj Sat</th>
<th>v/c</th>
<th>g/c</th>
<th>Approach</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Wvts</td>
<td>Cap</td>
<td>Flow</td>
<td>Ratio</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EB TR</td>
<td>6414</td>
<td>4297</td>
<td>0.69</td>
<td>0.67</td>
</tr>
<tr>
<td>WB T</td>
<td>3374</td>
<td>2261</td>
<td>0.51</td>
<td>0.67</td>
</tr>
<tr>
<td>SB L</td>
<td>1439</td>
<td>389</td>
<td>0.63</td>
<td>0.27</td>
</tr>
<tr>
<td>T</td>
<td>3354</td>
<td>895</td>
<td>1.11</td>
<td>0.27</td>
</tr>
<tr>
<td>R</td>
<td>1297</td>
<td>350</td>
<td>0.82</td>
<td>0.27</td>
</tr>
</tbody>
</table>

Intersection Delay = 24.2 (sec/veh)  Intersection LOS = C
BCOM: SIGNALIZED INTERSECTION SUMMARY
Center For Microcomputers In Transportation

Streets: (E-W) KAPIOLANI BLVD. (N-S) PEELO STREET
Analyst: VIJAY SIMHA    File Name: KOIPWOUT.BC9
Area Type: Other    4-3-92 PM
Condition: CUMULATIVE WITHOUT PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th></th>
<th>Westbound</th>
<th></th>
<th>Northbound</th>
<th></th>
<th>Southbound</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>&gt; 4 &lt;</td>
<td>2 &lt;</td>
<td>1 3 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volumes</td>
<td>141 2333</td>
<td>67 764 192</td>
<td>250 1522 222</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>10.0</td>
<td>10.0 10.0 12.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PTOR Vols</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signal Operations

<table>
<thead>
<tr>
<th></th>
<th>EB</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase combination L</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
<td>7</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>EB Left</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ped</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ped</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green</td>
<td>55P</td>
<td>55P</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yellow/A-R</td>
<td>5</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost Time</td>
<td>3.0</td>
<td>3.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Cycle Length: 100 secs  Phase combination order: 2 3 4

Intersection Performance Summary

<table>
<thead>
<tr>
<th>Lane Group</th>
<th>Adj Sat</th>
<th>v/c</th>
<th>g/c</th>
<th>Approach</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EB LTR</td>
<td>5402</td>
<td>3079</td>
<td>0.96</td>
<td>0.57</td>
</tr>
<tr>
<td>WB TR</td>
<td>3215</td>
<td>1833</td>
<td>0.58</td>
<td>0.57</td>
</tr>
<tr>
<td>WB L</td>
<td>1409</td>
<td>521</td>
<td>0.59</td>
<td>0.37</td>
</tr>
<tr>
<td>T</td>
<td>4972</td>
<td>1840</td>
<td>0.96</td>
<td>0.37</td>
</tr>
<tr>
<td>R</td>
<td>1515</td>
<td>561</td>
<td>0.42</td>
<td>0.37</td>
</tr>
</tbody>
</table>

Intersection Delay = 22.7 (sec/veh)  Intersection LOS = C

.457
**HCM: SIGNALIZED INTERSECTION SUMMARY**

Center For Microcomputers In Transportation

**Streets:** (E-W) KAPIOLANI BLVD. (N-S) PENSACOLA ST

**Analyst:** VIJAY SINHA

**Area Type:** Other

**Comment:** CUMULATIVE WITH PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th></th>
<th>Westbound</th>
<th></th>
<th>Northbound</th>
<th></th>
<th>Southbound</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>2</td>
<td>&lt;</td>
<td>4</td>
<td>5</td>
<td>50</td>
<td>2090</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Volumes</td>
<td>585</td>
<td>170</td>
<td>50</td>
<td>2090</td>
<td>11.0</td>
<td>30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>0</td>
<td>11.0</td>
<td>30</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Signal Operations**

<table>
<thead>
<tr>
<th>Phase combination</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green</td>
<td>65P</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yellow/A-R</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost Time</td>
<td>3.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Cycle Length:** 100 secs  Phase combination order: #1 #5

**Intersection Performance Summary**

<table>
<thead>
<tr>
<th>Lane Mvmts</th>
<th>Lane Group</th>
<th>Adj Sat</th>
<th>v/c</th>
<th>g/c</th>
<th>Ratio</th>
<th>g/c</th>
<th>Ratio</th>
<th>Delay</th>
<th>LOS</th>
<th>Delay</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB TR</td>
<td>3118</td>
<td>2089</td>
<td>0.40</td>
<td>0.67</td>
<td>5.7</td>
<td>B</td>
<td>5.7</td>
<td>B</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB LT</td>
<td>6351</td>
<td>4255</td>
<td>0.58</td>
<td>0.67</td>
<td>6.9</td>
<td>B</td>
<td>6.9</td>
<td>B</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB L</td>
<td>1439</td>
<td>389</td>
<td>0.68</td>
<td>0.27</td>
<td>28.0</td>
<td>D</td>
<td>36.0</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>T</td>
<td>3115</td>
<td>895</td>
<td>0.87</td>
<td>0.27</td>
<td>33.1</td>
<td>D</td>
<td>36.0</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>R</td>
<td>1297</td>
<td>350</td>
<td>0.93</td>
<td>0.27</td>
<td>49.3</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Intersection Delay = 15.2 (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  
**Area Type:** Other  
**File Name:** KOIAMWIT, HC9  
**Date:** 4-3-92 AM

**Comment:** CUMULATIVE WITH PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th></th>
<th>Westbound</th>
<th></th>
<th>Northbound</th>
<th></th>
<th>Southbound</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td><strong>No. Lanes</strong></td>
<td>2</td>
<td>&lt;</td>
<td>&gt; 4</td>
<td>&lt;</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td><strong>Volumes</strong></td>
<td>795</td>
<td>40</td>
<td>70</td>
<td>1995</td>
<td>240</td>
<td></td>
<td>145</td>
<td>820</td>
</tr>
<tr>
<td><strong>Lane Width</strong></td>
<td>10.0</td>
<td>0</td>
<td>0</td>
<td>10.0</td>
<td>0</td>
<td></td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td><strong>RTOR Vols</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

|                  |           |          |           |           |            |          |            |          |          |
| **Signal Operations** |           |          |           |           |            |          |            |          |          |
| **Phase combination** | 1         | 2        | 3         | 4         |            |          | 5          | 6        | 7        | 8        |
| EB Left          |           | Thru     | Right     | Peds      | SB Left    | Thru     | Right      | Peds     |           |           |
| Thru            | *         | *        | *         | *         |            | *        | *          | *        |           |           |
| Right           | *         | *        | *         | *         |            | *        | *          | *        |           |           |
| Peds            | *         | *        | *         | *         |            | *        | *          | *        |           |           |
| WB Left         |           | Thru     | Right     | Peds      | EB Right   | WB Right |           |          |           |           |
| Thru            | *         | *        | *         | *         |            |           | *          | *        |           |           |
| Right           | *         | *        | *         | *         |            | *        | *          | *        |           |           |
| Peds            | *         | *        | *         | *         |            | *        | *          | *        |           |           |
| NB Right        |           |          |           |           |            |          | Green      | 27P      |           |           |
| SB Right        |           |          |           |           |            |          | Yellow/A-R | 5        |           |           |
| Green           | 63P       |          |           |           |            |          |            |          |           |           |
| Yellow/A-R      | 5         |          |           |           |            |          |            |          |           |           |
| Lost Time       | 3.0       |          |           |           |            |          | Lost Time  | 3.0      |           |           |
| Cycle Length    | 100 secs  |          |           |           |            |          |            |          |           |           |
| Phase combination order: | #1 #5     |          |           |           |            |          |            |          |           |           |

---

### Intersection Performance Summary

<table>
<thead>
<tr>
<th>Lane</th>
<th>Mvmts Cap</th>
<th>Adj Sat Flow</th>
<th>v/c Ratio</th>
<th>g/c Ratio Delay</th>
<th>Approach Delay</th>
<th>Approach LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB TR</td>
<td>3290</td>
<td>2138</td>
<td>0.43</td>
<td>0.65</td>
<td>6.6</td>
<td>B</td>
</tr>
<tr>
<td>WB LTR</td>
<td>5839</td>
<td>3795</td>
<td>0.70</td>
<td>0.65</td>
<td>9.0</td>
<td>B</td>
</tr>
<tr>
<td>NB L</td>
<td>1409</td>
<td>409</td>
<td>0.37</td>
<td>0.29</td>
<td>21.8</td>
<td>C</td>
</tr>
<tr>
<td>T</td>
<td>4972</td>
<td>1442</td>
<td>0.66</td>
<td>0.29</td>
<td>24.5</td>
<td>C</td>
</tr>
<tr>
<td>R</td>
<td>1515</td>
<td>439</td>
<td>0.13</td>
<td>0.29</td>
<td>19.9</td>
<td>C</td>
</tr>
</tbody>
</table>

**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: COLPWIT.HC9

Area Type: Other  4-3-92 PM

Comment: CUMULATIVE WITH PROJECT CONDITION

---

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th>Westbound</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>R</td>
<td>L</td>
</tr>
<tr>
<td>No. Lanes</td>
<td>4</td>
<td>2</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Volumes</td>
<td>2240</td>
<td>330</td>
<td></td>
<td>325</td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>11.0</td>
<td></td>
<td>14.0</td>
</tr>
<tr>
<td>RTOR Vols</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**Signal Operations**

<table>
<thead>
<tr>
<th>Phase combination</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>EB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Right</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td>*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB Left</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thru</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green</td>
<td>65P</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yellow/A-R</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost Time</td>
<td>3.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Cycle Length: 100 secs  Phase combination order: #1 #5

---

**Intersection Performance Summary**

<table>
<thead>
<tr>
<th>Lane</th>
<th>Group:</th>
<th>Cap</th>
<th>Flow</th>
<th>Ratio</th>
<th>v/c</th>
<th>g/c</th>
<th>Ratio</th>
<th>Delay</th>
<th>LOS</th>
<th>Approach:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mvnts</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EB</td>
<td>TR</td>
<td>6414</td>
<td>4297</td>
<td>0.69</td>
<td>0.67</td>
<td>8.1</td>
<td>B</td>
<td>8.1</td>
<td>B</td>
<td></td>
</tr>
<tr>
<td>WB</td>
<td>T</td>
<td>3374</td>
<td>2261</td>
<td>0.52</td>
<td>0.67</td>
<td>6.5</td>
<td>B</td>
<td>6.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB</td>
<td>L</td>
<td>1439</td>
<td>389</td>
<td>0.88</td>
<td>0.27</td>
<td>40.7</td>
<td>E</td>
<td>73.0</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>T</td>
<td>3315</td>
<td>895</td>
<td>1.12</td>
<td>0.27</td>
<td>94.5</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>R</td>
<td>1297</td>
<td>350</td>
<td>0.66</td>
<td>0.27</td>
<td>27.8</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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) PIKOI STREET
Analyst: VIJAY SINHA  File Name: KOIPMWT.HC9
Area Type: Other  4-3-92 PM
Comment: CUMULATIVE WITH PROJECT CONDITION

<table>
<thead>
<tr>
<th></th>
<th>Eastbound</th>
<th></th>
<th>Westbound</th>
<th></th>
<th>Northbound</th>
<th></th>
<th>Southbound</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L  T  R</td>
<td>L  T  R</td>
<td>L  T  R</td>
<td>L  T  R</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No. Lanes</td>
<td>&gt; 4 &lt;</td>
<td>2 &lt;</td>
<td>1  3  1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volumes</td>
<td>150 2350 65</td>
<td>765 205</td>
<td>290 1540 220</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lane Width</td>
<td>10.0</td>
<td>10.0</td>
<td>10.0 10.0 12.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RTOR Vols</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Signal Operations**

- EB Left *
- EB Thru *
- EB Right *
- EB Peds *
- WB Left
- WB Thru *
- WB Right *
- WB Peds *
- NB Left *
- NB Thru *
- NB Right *
- NB Peds *
- SB Left
- SB Thru
- SB Right
- SB Peds

**Intersection Performance Summary**

- **Lane Movts Group:**
  - EB LTR 5365
  - WB TR 3210
  - NB L 4972
  - R 1515

- **Adj Sat Flow:***
  - EB 3058
  - WB 1810
  - NB 1840
  - R 561

- **v/c Ratio:**
  - EB 0.97
  - WB 0.59
  - NB 0.97
  - R 0.41

- **g/c Ratio:**
  - EB 0.57
  - WB 0.57
  - NB 0.37
  - R 0.37

- **Approach Delay:**
  - EB 23.6
  - WB 10.9
  - NB 20.5
  - R 34.2

- **LOS:**
  - EB C
  - WB B
  - NB C
  - R D

**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) 733-6534

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 $L_{max}$) 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 ($L_{50}$, 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, occurs 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:

- 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.
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.

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,

[Signature]

Yoshi Ebisu, P.E.

encl.
TABLE 1
AVAILABLE WORK HOURS UNDER DOH PERMIT PROCEDURES FOR CONSTRUCTION NOISE.

a. DOH PERMIT FOR NOISE EMISSIONS ≤95 dBA.

<table>
<thead>
<tr>
<th>Normal Permit</th>
<th>Wk dys</th>
<th>Sat/Sun</th>
<th>Weekly</th>
</tr>
</thead>
<tbody>
<tr>
<td>55.0</td>
<td>11/0</td>
<td>66.0 hrs</td>
<td></td>
</tr>
</tbody>
</table>

b. DOH PERMIT FOR NOISE EMISSIONS ≥95 dBA.

<table>
<thead>
<tr>
<th>Normal Permit</th>
<th>Wk dys</th>
<th>Sat/Sun</th>
<th>Weekly</th>
</tr>
</thead>
<tbody>
<tr>
<td>42.5</td>
<td>0/0</td>
<td>42.5 hrs</td>
<td></td>
</tr>
</tbody>
</table>
TABLE 2
SUMMARY OF BUILDING DAMAGE CRITERIA

<table>
<thead>
<tr>
<th>PEAK GROUND VELOCITY (mm/sec)</th>
<th>PEAK GROUND VELOCITY (in/sec)</th>
<th>COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>193.04</td>
<td>7.6</td>
<td>Major damage to buildings (mean of data).</td>
</tr>
<tr>
<td>137.72</td>
<td>5.4</td>
<td>Minor damage to buildings (mean of data).</td>
</tr>
<tr>
<td>101.16</td>
<td>4.0</td>
<td>'Engineer structures' safe from damage.</td>
</tr>
<tr>
<td>50.8</td>
<td>2.0</td>
<td>Safe from damage limit (probability of damage &lt;5%).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No structural damage.</td>
</tr>
<tr>
<td>33.02</td>
<td>1.3</td>
<td>Threshold of risk of 'architectural' damage for houses.</td>
</tr>
<tr>
<td>25.4</td>
<td>1.0</td>
<td>No data showing damage to structures for vibration &lt;1 in/sec.</td>
</tr>
<tr>
<td>15.24</td>
<td>0.6</td>
<td>No risk of 'architectural' damage to normal buildings.</td>
</tr>
<tr>
<td>10.16</td>
<td>0.4</td>
<td>Threshold of damage in older homes.</td>
</tr>
<tr>
<td>5.08</td>
<td>0.2</td>
<td>Statistically significant percentage of structures may experience minor damage (including earthquake, nuclear event, and blast data for old and new structures).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No 'architectural' damage.</td>
</tr>
<tr>
<td>3.81</td>
<td>0.5 to 0.15</td>
<td>Upper limits for ruins and ancient monuments.</td>
</tr>
<tr>
<td>1.0</td>
<td>0.04</td>
<td>Vertical vibration clearly perceptible to humans.</td>
</tr>
<tr>
<td>0.32</td>
<td>0.01</td>
<td>Vertical vibration just perceptible to humans.</td>
</tr>
</tbody>
</table>

VIBRATION INTENSITY VERSUS SCALED ENERGY

Particle Velocity - In/sec

√Energy - Ft Lb
Distance - Ft

Plaster Cracks (Residences)
Recommended Safe Level (Residences)

Objectionable
Disturbing
Unpleasant
Well Noticeable
Perceptible
Imperceptible

MAXIMUM VIBRATION INTENSITIES EXPECTED FROM PILE DRIVING

FIGURE 2
August 28, 1992
16274-012-011

Walter Leong & Associates
600 Kapiolani Boulevard, Suite 210
Honolulu, Hawaii 96813

Attention: Mr. Curtis Miyamura

Fax: (808) 531-7057

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:

<table>
<thead>
<tr>
<th>Class</th>
<th>Description</th>
<th>Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class I</td>
<td>Structures of substantial construction</td>
<td>4.0 ips</td>
</tr>
<tr>
<td>Class II</td>
<td>Relatively new residential structures in sound condition</td>
<td>2.0 ips</td>
</tr>
<tr>
<td>Class III</td>
<td>Relatively old residential structures in poor condition</td>
<td>1.0 ips</td>
</tr>
<tr>
<td>Class IV</td>
<td>Old residential structures in very poor condition</td>
<td>0.5 ips</td>
</tr>
</tbody>
</table>

(NUO:16274-012)
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  

---

Page II
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
Hale Kewalo Social Impact Assessment
Prepared by Earthplan

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
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. Denise 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
Hale Kewalo Social Impact Assessment
Prepared by Earthplan

- 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. 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 35 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**

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>Rental Amount</th>
<th>Maximum Rental Subsidy</th>
<th>Minimum Net Rental</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>$600</td>
<td>$175</td>
<td>$425</td>
</tr>
<tr>
<td>One-Bedroom</td>
<td>$750</td>
<td>$175</td>
<td>$575</td>
</tr>
<tr>
<td>Two-Bedroom</td>
<td>$1,000</td>
<td>$175</td>
<td>$825</td>
</tr>
</tbody>
</table>

*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. 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'eauumoku Street on the 'ewa side. It runs mauka-makai from King Street to Kapilolani 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'eauumoku, King and Pensacola Streets and Kapilolani 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, Kapilolani 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 206 people resided in this area in 1990. Information comparable to that used in our study was not available at this “Block Group” level.
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>
<thead>
<tr>
<th></th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1s</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>836,231</td>
<td>10,657</td>
<td>5,151</td>
<td>2,474</td>
<td>2,342</td>
<td>690</td>
</tr>
<tr>
<td>Ethnicity</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Caucasian</td>
<td>31.6%</td>
<td>29.2%</td>
<td>25.0%</td>
<td>16.0%</td>
<td>51.1%</td>
<td>33.6%</td>
</tr>
<tr>
<td>Chinese</td>
<td>7.6%</td>
<td>9.5%</td>
<td>11.1%</td>
<td>11.5%</td>
<td>3.1%</td>
<td>11.9%</td>
</tr>
<tr>
<td>Filipino</td>
<td>14.4%</td>
<td>5.0%</td>
<td>4.3%</td>
<td>5.4%</td>
<td>6.7%</td>
<td>3.3%</td>
</tr>
<tr>
<td>Japanese</td>
<td>23.3%</td>
<td>32.8%</td>
<td>32.2%</td>
<td>47.5%</td>
<td>17.8%</td>
<td>35.5%</td>
</tr>
<tr>
<td>Korean</td>
<td>2.7%</td>
<td>11.2%</td>
<td>16.4%</td>
<td>6.3%</td>
<td>7.1%</td>
<td>3.8%</td>
</tr>
<tr>
<td>Hawaiian</td>
<td>11.0%</td>
<td>5.5%</td>
<td>4.5%</td>
<td>8.0%</td>
<td>5.5%</td>
<td>3.6%</td>
</tr>
<tr>
<td>Other</td>
<td>9.4%</td>
<td>6.7%</td>
<td>6.4%</td>
<td>5.3%</td>
<td>8.7%</td>
<td>8.3%</td>
</tr>
<tr>
<td>Age</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Less than 5</td>
<td>7.4%</td>
<td>3.0%</td>
<td>2.7%</td>
<td>3.4%</td>
<td>3.4%</td>
<td>3.0%</td>
</tr>
<tr>
<td>5 to 17 years</td>
<td>17.1%</td>
<td>5.8%</td>
<td>5.1%</td>
<td>9.6%</td>
<td>5.0%</td>
<td>0.7%</td>
</tr>
<tr>
<td>18 to 44 years</td>
<td>46.2%</td>
<td>46.4%</td>
<td>42.4%</td>
<td>52.7%</td>
<td>44.1%</td>
<td>62.6%</td>
</tr>
<tr>
<td>45 to 64 years</td>
<td>18.3%</td>
<td>21.6%</td>
<td>23.5%</td>
<td>18.1%</td>
<td>22.2%</td>
<td>18.6%</td>
</tr>
<tr>
<td>65 or older</td>
<td>11.0%</td>
<td>23.1%</td>
<td>26.4%</td>
<td>16.3%</td>
<td>25.4%</td>
<td>15.1%</td>
</tr>
<tr>
<td>Median Age</td>
<td>32.2</td>
<td>n/a</td>
<td>43.7</td>
<td>38.8</td>
<td>46.7</td>
<td>36.7</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Place of Birth</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hawai'i-born</td>
<td>54.2%</td>
<td>44.5%</td>
<td>43.8%</td>
<td>69.4%</td>
<td>19.3%</td>
<td>44.3%</td>
</tr>
<tr>
<td>Other U.S.</td>
<td>30.1%</td>
<td>25.7%</td>
<td>20.4%</td>
<td>12.7%</td>
<td>49.5%</td>
<td>31.0%</td>
</tr>
<tr>
<td>Abroad</td>
<td>15.7%</td>
<td>29.8%</td>
<td>35.7%</td>
<td>17.8%</td>
<td>31.1%</td>
<td>24.6%</td>
</tr>
</tbody>
</table>

Table 3: Place of Birth and Previous Residence, 1990

<table>
<thead>
<tr>
<th>Residence 5 Years Earlier (Persons 5 Years and older)</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Same house</td>
<td>50.3%</td>
<td>48.5%</td>
<td>50.7%</td>
<td>56.3%</td>
<td>45.2%</td>
<td>16.3%</td>
</tr>
<tr>
<td>Same Island</td>
<td>25.9%</td>
<td>29.4%</td>
<td>28.5%</td>
<td>32.9%</td>
<td>18.0%</td>
<td>62.3%</td>
</tr>
<tr>
<td>Other Island</td>
<td>1.1%</td>
<td>0.8%</td>
<td>0.8%</td>
<td>0.8%</td>
<td>0.8%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other State</td>
<td>17.3%</td>
<td>13.1%</td>
<td>10.6%</td>
<td>6.8%</td>
<td>24.3%</td>
<td>15.7%</td>
</tr>
<tr>
<td>Abroad</td>
<td>5.3%</td>
<td>8.2%</td>
<td>9.3%</td>
<td>3.3%</td>
<td>11.6%</td>
<td>5.7%</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th></th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Educational Attainment (aged 25+)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Less than high school</td>
<td>18.8%</td>
<td>21.3%</td>
<td>26.9%</td>
<td>22.6%</td>
<td>12.3%</td>
<td>7.8%</td>
</tr>
<tr>
<td>High school graduate</td>
<td>28.4%</td>
<td>25.1%</td>
<td>26.8%</td>
<td>30.4%</td>
<td>20.9%</td>
<td>11.1%</td>
</tr>
<tr>
<td>Some College</td>
<td>28.2%</td>
<td>27.4%</td>
<td>25.7%</td>
<td>31.2%</td>
<td>28.4%</td>
<td>24.4%</td>
</tr>
<tr>
<td>College 4 Years+</td>
<td>24.6%</td>
<td>26.3%</td>
<td>20.6%</td>
<td>15.8%</td>
<td>38.5%</td>
<td>56.8%</td>
</tr>
<tr>
<td><strong>Labor force (aged 16+)</strong></td>
<td>651,920</td>
<td>9,841</td>
<td>4,822</td>
<td>3,190</td>
<td>2,165</td>
<td>664</td>
</tr>
<tr>
<td>Civilian Labor Force</td>
<td>62.9%</td>
<td>61.6%</td>
<td>57.2%</td>
<td>71.7%</td>
<td>57.8%</td>
<td>73.1%</td>
</tr>
<tr>
<td>Armed Forces</td>
<td>8.2%</td>
<td>1.0%</td>
<td>0.8%</td>
<td>0.5%</td>
<td>2.0%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Not in Labor Force</td>
<td>28.9%</td>
<td>37.4%</td>
<td>42.0%</td>
<td>27.8%</td>
<td>40.2%</td>
<td>26.8%</td>
</tr>
<tr>
<td>Unemployed Civilian Labor Force</td>
<td>3.5%</td>
<td>2.5%</td>
<td>2.2%</td>
<td>1.2%</td>
<td>4.2%</td>
<td>3.7%</td>
</tr>
<tr>
<td><strong>Occupation (aged 16+)(1)</strong></td>
<td>27.7%</td>
<td>28.6%</td>
<td>24.9%</td>
<td>19.1%</td>
<td>38.7%</td>
<td>56.0%</td>
</tr>
<tr>
<td>Managerial/Prof.</td>
<td>34.6%</td>
<td>34.7%</td>
<td>37.2%</td>
<td>34.2%</td>
<td>30.8%</td>
<td>31.6%</td>
</tr>
<tr>
<td>Technical/Sales</td>
<td>16.8%</td>
<td>17.7%</td>
<td>21.3%</td>
<td>15.8%</td>
<td>16.0%</td>
<td>7.1%</td>
</tr>
<tr>
<td>Service</td>
<td>1.5%</td>
<td>0.7%</td>
<td>0.6%</td>
<td>1.2%</td>
<td>0.6%</td>
<td>0.0%</td>
</tr>
<tr>
<td>Farm/Fishing</td>
<td>9.5%</td>
<td>10.3%</td>
<td>8.3%</td>
<td>16.4%</td>
<td>9.9%</td>
<td>3.2%</td>
</tr>
<tr>
<td>Precision/Craft</td>
<td>9.5%</td>
<td>8.0%</td>
<td>7.7%</td>
<td>13.4%</td>
<td>4.0%</td>
<td>2.1%</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th></th>
<th>O‘ahu Area</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of Persons in Families</td>
<td>82.5%</td>
<td>57.4%</td>
<td>52.6%</td>
<td>65.4%</td>
<td>57.5%</td>
<td>64.9%</td>
</tr>
<tr>
<td>Persons per Family</td>
<td>3.5</td>
<td>N/A</td>
<td>2.52</td>
<td>2.76</td>
<td>2.34</td>
<td>2.49</td>
</tr>
<tr>
<td>Family House-Married Couples</td>
<td>199,597</td>
<td>2,500</td>
<td>1,102</td>
<td>570</td>
<td>638</td>
<td>190</td>
</tr>
<tr>
<td>W/ Children Under 18</td>
<td>81.5%</td>
<td>76.0%</td>
<td>73.8%</td>
<td>73.7%</td>
<td>81.3%</td>
<td>78.4%</td>
</tr>
<tr>
<td>Male Householder W/ Children Under 18</td>
<td>39.4%</td>
<td>57.6%</td>
<td>57.9%</td>
<td>49.1%</td>
<td>63.1%</td>
<td>65.8%</td>
</tr>
<tr>
<td>Female House-W/ Children Under 18</td>
<td>5.4%</td>
<td>7.6%</td>
<td>6.0%</td>
<td>8.6%</td>
<td>7.4%</td>
<td>14.7%</td>
</tr>
<tr>
<td>Median Family Income</td>
<td>$45,313</td>
<td>N/A</td>
<td>$28,391</td>
<td>$31,061</td>
<td>$47,833</td>
<td>$55,000</td>
</tr>
<tr>
<td>Families Below Poverty Level (1)</td>
<td>5.4%</td>
<td>7.4%</td>
<td>8.9%</td>
<td>4.7%</td>
<td>6.7%</td>
<td>8.4%</td>
</tr>
</tbody>
</table>


(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

<table>
<thead>
<tr>
<th>Housing Units</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner Occupied</td>
<td>281,683</td>
<td>6,655</td>
<td>3,346</td>
<td>1,250</td>
<td>1,622</td>
<td>437</td>
</tr>
<tr>
<td>Renter Occupied</td>
<td>49.0%</td>
<td>28.5%</td>
<td>27.5%</td>
<td>17.7%</td>
<td>34.0%</td>
<td>47.1%</td>
</tr>
<tr>
<td>Vacant</td>
<td>45.2%</td>
<td>62.9%</td>
<td>68.7%</td>
<td>77.9%</td>
<td>46.4%</td>
<td>37.1%</td>
</tr>
</tbody>
</table>

### Units per Structure

<table>
<thead>
<tr>
<th>Structure</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Detached</td>
<td>44.9%</td>
<td>2.0%</td>
<td>0.3%</td>
<td>8.8%</td>
<td>0.4%</td>
<td>1.4%</td>
</tr>
<tr>
<td>1 Attached</td>
<td>10.3%</td>
<td>0.7%</td>
<td>0.3%</td>
<td>2.5%</td>
<td>0.2%</td>
<td>0.0%</td>
</tr>
<tr>
<td>2 to 9 Units</td>
<td>13.4%</td>
<td>10.2%</td>
<td>1.9%</td>
<td>42.9%</td>
<td>4.0%</td>
<td>4.1%</td>
</tr>
<tr>
<td>10 to 50 Units</td>
<td>12.3%</td>
<td>15.4%</td>
<td>12.7%</td>
<td>35.0%</td>
<td>8.5%</td>
<td>5.0%</td>
</tr>
<tr>
<td>More Than 50</td>
<td>17.8%</td>
<td>70.3%</td>
<td>83.2%</td>
<td>9.8%</td>
<td>85.7%</td>
<td>87.6%</td>
</tr>
<tr>
<td>Other</td>
<td>1.3%</td>
<td>1.4%</td>
<td>1.6%</td>
<td>1.1%</td>
<td>1.2%</td>
<td>1.8%</td>
</tr>
</tbody>
</table>

### Occupied Housing Units

<table>
<thead>
<tr>
<th>Household Size</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.02</td>
<td>6,088</td>
<td>3,220</td>
<td>1,195</td>
<td>1,395</td>
<td>368</td>
<td></td>
</tr>
</tbody>
</table>

### Median Value of owner-occupied units

<table>
<thead>
<tr>
<th>Median</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>$283,600</td>
<td>N/A</td>
<td>$450,000</td>
<td>$306,300</td>
<td>$87,500</td>
<td>$162,500</td>
<td></td>
</tr>
</tbody>
</table>

### Median Rent of renter-occupied units

<table>
<thead>
<tr>
<th>Median</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>$615</td>
<td>N/A</td>
<td>$574</td>
<td>$482</td>
<td>$765</td>
<td>$1,001</td>
<td></td>
</tr>
</tbody>
</table>

### Persons / room

<table>
<thead>
<tr>
<th>Persons / room</th>
<th>O'ahu</th>
<th>Study Area</th>
<th>Sub-Area 1</th>
<th>Sub-Area 2</th>
<th>Sub-Area 3</th>
<th>Sub-Area 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.00 to 1.50(1)</td>
<td>8.2%</td>
<td>3.9%</td>
<td>2.9%</td>
<td>7.6%</td>
<td>3.1%</td>
<td>4.1%</td>
</tr>
<tr>
<td>1.51 or more(2)</td>
<td>8.2%</td>
<td>12.5%</td>
<td>15.7%</td>
<td>11.0%</td>
<td>8.0%</td>
<td>4.1%</td>
</tr>
</tbody>
</table>

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 Pilikoi 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.*
Hale Kewalo Social Impact Assessment

Prepared by Earthplan

- 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 unserviced 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. 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'alea-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 Kapilani 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**

<table>
<thead>
<tr>
<th>Proposed Project</th>
<th>Number of Residential Units</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>One Waterfront Plaza and Towers</td>
<td>307</td>
<td>Completed</td>
</tr>
<tr>
<td>The Pacific Park Plaza (including Royal Capitol Plaza)</td>
<td>297</td>
<td>Completed</td>
</tr>
<tr>
<td>404 Pi‘ikoi</td>
<td>1,400</td>
<td>Partially completed</td>
</tr>
<tr>
<td>Waterpark towers</td>
<td>560</td>
<td>Sitework activity</td>
</tr>
<tr>
<td>Imperial Plaza</td>
<td>221</td>
<td>Completed</td>
</tr>
<tr>
<td>Kamakee Vista</td>
<td>227</td>
<td>Completed</td>
</tr>
<tr>
<td>Pohulani</td>
<td>263</td>
<td>Completed</td>
</tr>
<tr>
<td>1230 Kapiolani</td>
<td>348</td>
<td>Litigation pending</td>
</tr>
<tr>
<td>Queen Emmalani</td>
<td>268</td>
<td>Sitework activity</td>
</tr>
<tr>
<td>Majestic Plaza</td>
<td>335</td>
<td>Not started</td>
</tr>
<tr>
<td>Kauhale Kakasko</td>
<td>268</td>
<td>Completion scheduled for 8/93</td>
</tr>
<tr>
<td>Na Lei Hulu Kupuna</td>
<td>76</td>
<td>Completed</td>
</tr>
<tr>
<td>Symphony Park</td>
<td>301</td>
<td>Sitework Activity</td>
</tr>
<tr>
<td>King Street Place</td>
<td>284</td>
<td>Concurrent with previous project</td>
</tr>
</tbody>
</table>

*a. Does not include the remaining portion of the Study Area*

*Sources: Information from HCDA dated 2/1/93 and related news articles.*
In addition to the developments in Kaka'ako, there are two other major developments proposed:

- **Keeau-moku Superblock**

  The Keeau-moku Superblock is being proposed by developer Keeau-moku Partners. The project site is bounded by Ke‘eau-moku, Rycroft, Sheridan and Makalau 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

- **Pawa‘a 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‘eau-moku 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

---

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'ilikoi Street, Penasco 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'ilikoi 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.
Hale Kewalo Social Impact Assessment

Prepared by Earthplan

- 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.\(^\text{12}\)

- 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.\(^\text{13}\)

\(^{12}\) 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

<table>
<thead>
<tr>
<th></th>
<th>Current Number of Units</th>
<th>Potential Residential Population (1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Projects in Kakasko Community Development District (2)</td>
<td>5,155</td>
<td>9,022 to 11,341</td>
</tr>
<tr>
<td>Keeauomoku Superblock</td>
<td>200</td>
<td>350 to 440</td>
</tr>
<tr>
<td>Total</td>
<td>7,503</td>
<td>9,372 to 11,781</td>
</tr>
</tbody>
</table>

(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.
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. Hori, Jr. Vice President for Finance and Operations to Mike McElnay, 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

<table>
<thead>
<tr>
<th>Estimated population of Hale Kewalo (1)</th>
<th>927</th>
<th>to</th>
<th>1,166</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated 2010 Population for PUC DP area (2)</td>
<td>469,600</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project’s share of 2010 PUC population</td>
<td>0.1%</td>
<td>to</td>
<td>0.2%</td>
</tr>
<tr>
<td>Estimated 1990 Study Area population (3)</td>
<td>10,657</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Estimated Study Area population with Hale Kewalo redevelopment</td>
<td>11,584</td>
<td>to</td>
<td>11,823</td>
</tr>
<tr>
<td>% increase in Study Area population due to project</td>
<td>8.7%</td>
<td>to</td>
<td>10.9%</td>
</tr>
</tbody>
</table>

(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.  
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.

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 workforce. Institutions in a high-cost housing environment are often at a further disadvantage in recruiting qualified personnel.

In the UH Faculty Housing Assistance Master Plan\textsuperscript{17} 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 areas. This program has six categories as follows:

\textsuperscript{17} KPMP Peat Marwick, 1991.
Hale Kewalo Social Impact Assessment

Prepared by Earthplan

- 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, Wahiwila 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 Noeana 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. Wahiwila 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 Social Impact Assessment

Prepared by Earthplan

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 bus lines and thoroughfares, so faculty will be able to easily commute to the UH-Manoa, Kapolei 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. 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.

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 Kapl ‘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 - Kapl ‘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 Kapl ‘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 Kapl ‘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 1250 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’ilani 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 Kap‘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 Kap‘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, Kapiolani 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 Kapilolani 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, barbecue 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 the 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, 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 fair 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. 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 Kailani, Kauluwela, Likelike, Lanakila, Royal, Ala Wai, Kaahumanu and Lunahilo 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. 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.

Table 10: Historic Enrollment at McKinley High School

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>1975</td>
<td>2,500</td>
</tr>
<tr>
<td>1976</td>
<td>2,401</td>
</tr>
<tr>
<td>1977</td>
<td>2,388</td>
</tr>
<tr>
<td>1978</td>
<td>2,383</td>
</tr>
<tr>
<td>1979</td>
<td>2,339</td>
</tr>
<tr>
<td>1980</td>
<td>2,245</td>
</tr>
</tbody>
</table>

*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 that 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 Kapalolani Boulevard. It runs east from Ward Avenue to Piikoi 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.
Hale Kewalo Social Impact Assessment

Prepared by Earthplan

- Most of the existing crime problems in this area 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 Pauaa Fire Station, which has an engine and ladder company, responds to a first alarm at the project site; the Pauaa 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

<table>
<thead>
<tr>
<th>School (Grades)</th>
<th>1993-1994 Enrollmen (1)</th>
<th>Facility Capacity (2)</th>
<th>Remaining Capacity</th>
<th>Estimated Project Increase (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kaahumanu Elementary</td>
<td>704</td>
<td>745</td>
<td>41</td>
<td>72 students</td>
</tr>
<tr>
<td>(K through 5)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Central Intermediate</td>
<td>522</td>
<td>915</td>
<td>393</td>
<td>9 students</td>
</tr>
<tr>
<td>(6 through 8)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>McKinley High</td>
<td>1,972</td>
<td>2,094</td>
<td>122</td>
<td>27 students</td>
</tr>
<tr>
<td>(9 through 12)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sources:
(1) Telephone communication with Tom Saka, Demographics Specialist, State Department of Education, March 8, 1993.
(2) Telephone communication with Alan Honna, Facilities Branch, DOE, March 15, 1993.
(3) Based on per housing unit factors of .016 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 Pau'ia's 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.” Given the major growth anticipated in Kaka’ako, as well as in the nearby Ke‘auumoku 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.

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

---

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 Kakaskko 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 flyers 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 the 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 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. 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.

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 Puy, 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 EISP, the DOH 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

1. 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.
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

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 EISP.

The Makiki/Lower Punchbowl/Tantalus Neighborhood Board No. 10 recently responded to the EISP. 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 supersede 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*. 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. DOB 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


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.


Earthplan. Pawa‘a Redevelopment Social Impact Assessment. Prepared for the City Department of Housing and Community Development.


Hale Kewalo Social Impact Assessment

Prepared by Earthplan


Appendix A: List of Correspondence Reviewed for the Issues Analysis

Community Correspondence

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Date of Correspondence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cayetano, Avis</td>
<td>McKinley Student</td>
<td>February 19, 1993</td>
</tr>
<tr>
<td>Cheong, Corrinn</td>
<td>McKinley Student</td>
<td>February 16, 1993</td>
</tr>
<tr>
<td>Dilayo, Renee</td>
<td>McKinley Student</td>
<td>February 12, 1993</td>
</tr>
<tr>
<td>Gamata, Erlindo</td>
<td>McKinley Student</td>
<td>February 20, 1993</td>
</tr>
<tr>
<td>Gay, Rory M.</td>
<td>Archaeologist</td>
<td>September 20, 1992</td>
</tr>
<tr>
<td>Higino, David M.</td>
<td>State Representative</td>
<td>September 22, 1992</td>
</tr>
<tr>
<td>Hiraki, Kenneth</td>
<td>State Representative</td>
<td>September 22, 1992</td>
</tr>
<tr>
<td>Hirono, Mazie</td>
<td>State Representative</td>
<td>September 22, 1992</td>
</tr>
<tr>
<td>Ishikawa, Joy</td>
<td>McKinley Student</td>
<td>February 17, 1993</td>
</tr>
<tr>
<td>Kadooka, Paul</td>
<td>President, McKinley PTSA</td>
<td>September 22, 1992</td>
</tr>
<tr>
<td>Hammamoto, Patricia, et al.</td>
<td>Principal, McKinley</td>
<td>February 22, 1993</td>
</tr>
<tr>
<td>Kimura, Amy</td>
<td>McKinley Student</td>
<td>February 22, 1993</td>
</tr>
<tr>
<td>Lee, Vanessa</td>
<td>1st Vice President, McKinley Student Council</td>
<td>February 19, 1993</td>
</tr>
<tr>
<td>Palakiko - Hinch, Dan-regis</td>
<td>McKinley Student</td>
<td>February 22, 1993</td>
</tr>
<tr>
<td>Save McKinley Coalition (flier)</td>
<td>McKinley High School Faculty and Staff</td>
<td>No Date</td>
</tr>
<tr>
<td></td>
<td>McKinley High School PTSA</td>
<td></td>
</tr>
<tr>
<td></td>
<td>McKinley High School</td>
<td></td>
</tr>
<tr>
<td></td>
<td>McKinley High School</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Hawaii State PTSA</td>
<td></td>
</tr>
<tr>
<td></td>
<td>And Other Individual Supporters</td>
<td></td>
</tr>
<tr>
<td>Steelquist, John</td>
<td>Chair, Neighborhood Board # 10</td>
<td>February 10, 1993</td>
</tr>
</tbody>
</table>
Community Correspondence

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Date of Correspondence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Syles, Gaille A.</td>
<td>Save McKinley Coalition</td>
<td>September 21, 1992</td>
</tr>
<tr>
<td>Sykes, Gaille A.</td>
<td>McKinley Teacher, Coach</td>
<td>October 27, 1992</td>
</tr>
<tr>
<td>Tam, Rod</td>
<td>State Representative</td>
<td>September 22, 1992</td>
</tr>
<tr>
<td>Twenty-two Teachers</td>
<td>Teachers of McKinley High School</td>
<td>February 19, 1993</td>
</tr>
<tr>
<td>Theilen, Cynthia</td>
<td>State Representative</td>
<td>September 21, 1992</td>
</tr>
<tr>
<td>Yamashita, Chantal</td>
<td>McKinley Student</td>
<td>February 21, 1993</td>
</tr>
</tbody>
</table>

State of Hawai‘i Agencies

<table>
<thead>
<tr>
<th>Agency Name</th>
<th>Date of Correspondence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Accounting and General Services</td>
<td>September 15, 1992</td>
</tr>
<tr>
<td>Department of Business &amp; Economic Development &amp; Tourism</td>
<td>September 23, 1992</td>
</tr>
<tr>
<td>Department of Education</td>
<td>June 5, 1992</td>
</tr>
<tr>
<td></td>
<td>September 4, 1992</td>
</tr>
<tr>
<td></td>
<td>February 10, 1993</td>
</tr>
<tr>
<td>Board of Education</td>
<td>July 8, 1991</td>
</tr>
<tr>
<td></td>
<td>May 22, 1992</td>
</tr>
<tr>
<td>Department of Health</td>
<td>October 22, 1992</td>
</tr>
<tr>
<td>Department of Land and Natural Resources</td>
<td>September 18, 1992</td>
</tr>
<tr>
<td>Board of Land and Natural Resources</td>
<td>September 23, 1992</td>
</tr>
<tr>
<td>Department of Transportation</td>
<td>September 22, 1992</td>
</tr>
</tbody>
</table>
## State of Hawai‘i Agencies

<table>
<thead>
<tr>
<th>Agency Name</th>
<th>Date of Correspondence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office of Environmental Quality Control</td>
<td>August 25, 1992</td>
</tr>
</tbody>
</table>

## City and County of Honolulu Agencies

<table>
<thead>
<tr>
<th>Agency Name</th>
<th>Date of Correspondence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board of Water Supply</td>
<td>September 30, 1992</td>
</tr>
<tr>
<td>Department of General Planning</td>
<td>October 2, 1992</td>
</tr>
<tr>
<td>Department of Housing and Community</td>
<td>September 18, 1992</td>
</tr>
<tr>
<td>Development</td>
<td></td>
</tr>
<tr>
<td>Department of Land Utilization</td>
<td>September 25, 1992</td>
</tr>
<tr>
<td>Department of Parks and Recreation</td>
<td>October 27, 1992</td>
</tr>
<tr>
<td>Department of Public Works</td>
<td>September 16, 1992</td>
</tr>
<tr>
<td>Department of Transportation Services</td>
<td>September 25, 1992</td>
</tr>
<tr>
<td>Police Department</td>
<td>September 14, 1992</td>
</tr>
</tbody>
</table>