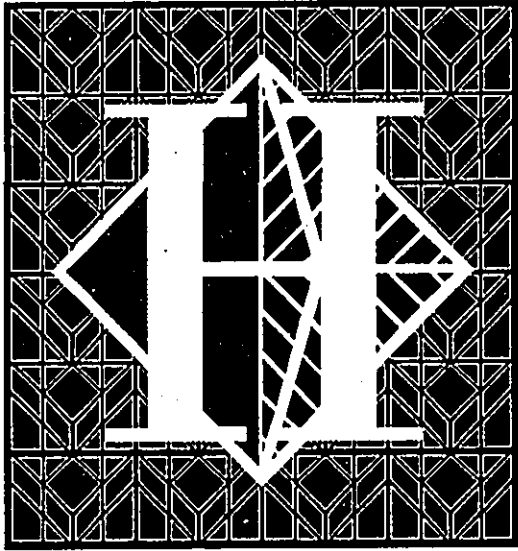


1995 - Oahu - FEIS -
Convention Center III

FILE COPY



Hawai'i Convention Center
Honolulu, Hawaii

FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME III
THE CONVENTION CENTER AUTHORITY, STATE OF HAWAII
JULY 1995

Hawai'i Convention Center
Honolulu, Hawaii

FINAL ENVIRONMENTAL IMPACT STATEMENT

VOLUME III

PREPARED FOR:

CONVENTION CENTER AUTHORITY
State of Hawaii

PREPARED BY:

NORDIC/PCL
WILSON OKAMOTO & ASSOCIATES, INC.

JULY 1995

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DRAFT EIS COMMENT AND RESPONSE LETTERS:

- Draft EIS Distribution List and Respondents
- Final Environmental Impact Statement Distribution List
- Draft EIS Consultation Issues Matrix

1. FEDERAL AGENCIES
2. STATE OF HAWAII
3. STATE LEGISLATURE
4. CITY AND COUNTY OF HONOLULU
5. CITY COUNCIL
6. UTILITIES
7. OTHER ORGANIZATIONS
8. COMMUNITY ORGANIZATIONS
9. CONDOMINIUM ASSOCIATION BOARDS
10. INDIVIDUALS

signal generator and power amplifier in an existing building at Barking Sands.

The project is also funding an extensive Marine Mammal Research Program (MMRP) to study the effect of long-term underwater low frequency acoustic transmissions on marine animals. Available information from the limited research carried out to date on the potential effect of low frequency sound on marine animals, either indicate minimal impact should be expected from the proposed sound transmissions or that the measured data are so sparse that the possible effect must be stated as uncertain. Project operations dedicated to climate-based studies will be preceded by an approximate 6-10 month MMRP Pilot Study, which will allow marine biologists to utilize the source for research studies into the potential effects of low frequency sound on marine animals. Acoustic thermometry transmissions would only begin if the system is determined to be safe for marine animals.

OAHU

EAST KAPOLEI PROJECT

District: Ewa
TMK: 9-1-17:por. 04

Accepting Authority:
City and County of Honolulu
Planning Department
650 South King Street
Honolulu, Hawaii 96813
Attention: Brian Suzuki (527-6073)

Proposing Agency:
Schuler Homes, Inc.
828 Fort Street Mall, 4th Floor
Honolulu, Hawaii 96813
Attention: Michael Angotti (521-5661)

Consultant:
Helber Hastert & Fee, Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Attention: Leslie Kurisaki (545-2055)
Deadline: March 9, 1995

The applicant, Schuler Homes, Inc., is seeking an amendment to the City and County of Honolulu's Development Plan Land Use Map for Ewa for the proposed East Kapolei project. The amendment request is proposing to redesignate approximately 1,104 acres from Agriculture to Low Density Apartment, Parks and Recreation, Public and Quasi-Public and Commercial. In addition, proposed text changes to the Ewa Development Plan Special Provisions are being requested.

The proposed site is located in the Ewa-Kapolei area and is surrounded by Farrington Highway to the north, cultivated agricultural lands to the east, the Ewa Villages residential area to the south, and by the approximate alignment of the proposed North-South Roadway and proposed University of Hawaii West Oahu campus to the west.

The proposed project will consist of approximately 10,000 residential units to be developed over a 15-year period in two phases. Phase 1 will be developed by a joint venture of Schuler

Homes, Inc. and Hawaiian Trust Company, Ltd., and will commence in 1997. Phase 2 will be developed by Schuler Homes, Inc. Approximately 30 percent of the new homes will be affordable to families earning below 120 percent of median income; with 60 percent of the homes affordable to families earning below 140 percent of median income.

The preliminary concept plan also includes two eight-acre elementary school sites, two ten-acre neighborhood parks, a 25-acre district park and three commercial shopping areas.

HAWAII CONVENTION CENTER

District: Honolulu
TMK: 2-3-35:01
Accepting Authority:
Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Suite 400
Honolulu, Hawaii 96813

Proposing Agency:
Convention Center Authority
841 Bishop Street, Suite 2222
Honolulu, Hawaii 96813
Attention: Alan Hayashi (586-2340)

Consultant:
Wilson Okamoto and Associates, Inc.
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Attention: Earl Matsukawa
Deadline: March 25, 1995

The State of Hawaii Convention Center Authority ("Authority") has selected Nordic/PCL to complete the design and construction of a "world-class" convention center facility on a 9.66-acre site located on the former Aloha Motors property, at 1777 Kapiolani Boulevard, Honolulu, adjacent to the intersection of Kapiolani Boulevard and Kalakaua Avenue. It is also bounded by Atkinson Drive to the northwest, Kahakai Drive to the west, and the Ala Wai Canal to the south.

The convention center is to be a four level, stand-alone facility, without additional private development on-site. The facility's gross building area will be approximately 1,106,670 square feet, including 200,000 gross square feet of exhibit space on a single level, meeting room space of 100,000 square feet, and multi-purpose ballroom area of 35,000 square feet. Approximately 800 parking spaces will be provided on-site. Future expansion space will be accommodated in the design for an additional 100,000 square feet of exhibit hall and 50,000 square feet for meeting rooms. The facility will feature many open-air gathering areas, abundant landscaping, design themes and artwork establishing a unique "Hawaiian Sense of Place."

In addition to the convention center facility, the proposed project will include road widening to mitigate traffic concerns and installation of a new sewer line to accommodate increased wastewater flows.

Although all known hazardous materials have previously been removed from the site, Nordic/PCL will prepare a contingency plan complying with all State and federal regulations to be implemented

in the event that unanticipated hazardous materials are encountered during construction.

Short-term impacts associated with construction of the project include those on air quality, noise, water quality, and botanical resources. Long-term impacts associated with construction of the project include those on traffic, utilities, socio-economy, scenic views, noise and air quality.

FINAL ENVIRONMENTAL IMPACT STATEMENTS

This section provides notice of EISs that have been submitted for acceptance. All substantive comments received by the applicant or proposing agency, and corresponding responses, should be contained within the Final EIS. This section also provides notice of acceptance determinations. Aggrieved parties who wish to contest the acceptance of an EIS have a sixty-day period in which to initiate litigation. The sixty-day litigation period starts from the date of publication of the notice of acceptance in the OEQC Bulletin.

HAWAII

HOOKENA ELEMENTARY SCHOOL EXPANSION

District: South Kona
TMK: 8-6-10:09 and 12 and 8-6-11:por. 2
Accepting Authority: Governor, State of Hawaii
c/o Office of Environmental Quality Control
Proposing Agency: Department of Accounting and General Services
Contact: Brian Isa (586-0484)
Consultant: Gima, Yoshimori, Miyabara, Deguchi Architects, Inc.
Contact: Benjamin Woo (955-3009)
Status: Currently being reviewed by the Office of Environmental Quality Control.

The Department of Accounting and General Services is proposing to expand the existing 4.033 acre Hookena Elementary School site to approximately 9 acres and improve existing facilities to meet the projected increases in the student population. Currently, Hookena Elementary School has 4 substandard permanent classrooms, 10 portable classrooms, and substandard open play area, library, cafeteria and administration building. In order to accommodate the projected 310 students for Grades K-5 by the year 2010, 16 permanent and 4 portable classrooms will be needed, along with upgraded library, cafeteria, administration and open play area facilities. With the additional land, a master plan will be developed for the school.

The site selection study addresses the reason for expanding the Hookena Elementary School site, the project objectives, the broadscale analysis used to identify the three suitable sites for expansion, and the detailed evaluation of each potential site. Because Mamalahoa Highway forms the east boundary, the three sites are located north, south and west of the school's property.

The three sites are vacant but still used by McCandless Ranch for grazing. Archaeological surveys were conducted to determine the location of historical and cultural significant sites.

KONA CIVIC CENTER

District: North Kona
TMK: 7-4-08:12 (Lot 1 and 2), 7-4-08:3 and 7-3-09:5
Accepting Authority: Governor, State of Hawaii
c/o Office of Environmental Quality Control
Proposing Agency: Department of Accounting and General Services
Contact: Ralph Yukumoto (586-0488)
Consultant: Design, Planning and Development, Inc.
Contact: Louis Fung (955-6088)
Status: Currently being reviewed by the Office of Environmental Quality Control.

The Department of Accounting and General Services (DAGS) proposes to locate a new civic center in the North Kona District. Establishment of the civic center will facilitate public business with state government agencies by consolidating them in one civic center.

The proposed civic center will be located on an approximately 30 acre site and is planned to include a Judiciary complex, State Office building, correctional facility, senior center, and a library. A moderate extension of necessary water, sewer, power and roadway facilities will be required for the development. Some potential impacts to existing fauna, flora and archaeological sites as well as a contribution to an increase of population and employment opportunities may be anticipated.

Based on established criteria, the following five candidate sites have been selected for consideration:

- Site 1 - Keahuolu Site-Palani Road (TMK 7-4-08:012 Lot 1) is located near the intersection of Palani Road and Queen Kaahumanu Highway.
- Site 2 - Keahuolu Site-Adjacent to the proposed Queen Liliuokalani Blvd. (TMK 7-4-08:012 Lot 2) is located south of the Kealakehe Police Station.
- Site 3 - Keahuolu Site-Adjacent to the Kealakehe Police Station (TMK 7-4-08:012 Lot 2) is located adjacent to the Kealakehe Police Station and Kailua Landfill.
- Site 4 - Honokohau Harbor Site (TMK 7-4-08:003) is located at the intersection of Queen Kaahumanu Highway and Kealakehe Drive adjacent to the new sewage treatment plant.
- Site 5 - Ooma Site (TMK 7-3-09:005) is located south of the existing State Keahole Agricultural Park on Queen Kaahumanu Highway.

OEQC BULLETIN PUBLICATION FORM

Title of Project: Hawaii Convention Center
Location: Island Oahu District Honolulu
Tax Map Key: 2-3-35-01

PLEASE CHECK THE FOLLOWING CATEGORIES:

TYPE OF ACTION: AGENCY [X] APPLICANT

Applicable State or Federal Statute:

[X] Chapter 343, HRS Chapter 205A, HRS NEPA (Federal Actions Only)

Type of Document:

Draft Environmental Assessment (Negative Declaration anticipated) [X] Draft EIS NEPA NOP
Final Environmental Assessment (Negative Declaration) Final EIS NEPA Draft EIS
Final Environmental Assessment (EIS Preparation Notice) NEPA FONSI NEPA Final EIS

Type of Revision (if applicable):

Revised Supplemental Addendum Other (please explain)

Prior to general distribution, please submit to OEQC: 4 copies of the Draft EA, Final EA (Negative Declaration or EIS Preparation Notice), 4 copies of the Draft EIS or Final EIS(For Draft and Final EISs an additional copy is mailed to OEQC.)

PROPOSING AGENCY OR APPLICANT SHOULD SUBMIT COPIES OF THE DOCUMENTS TO THE APPROVING AGENCY OR ACCEPTING AUTHORITY PRIOR TO SUBMITTING COPIES TO OEQC.

APPROVING AGENCY OR ACCEPTING AUTHORITY:

Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Suite 400
Honolulu, Hawaii 96813

CONTACT: PHONE:

PROPOSING AGENCY OR APPLICANT:

Convention Center Authority
841 Bishop Street, Suite 2222
Honolulu, Hawaii 96813

CONTACT: Alan Hayashi PHONE: 586-2340

CONSULTANT: Wilson Okamoto & Associates, Inc.
ADDRESS: 1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

CONTACT: Earl Matsukawa PHONE: 946-2277

COMMENT PERIOD END DATE: March 25, 1995

CONDITIONS WHICH TRIGGERED THE EIS LAW: PLEASE CHECK ALL THAT APPLY TO THE PROPOSED ACTION.

- | | |
|--|---|
| <input checked="" type="checkbox"/> Use of State or County lands or funds
HRS 343-5(a)(1) | <input type="checkbox"/> Use of lands in the Waikiki Special District
HRS 343-5(a)(5) |
| <input type="checkbox"/> Use of Conservation District Lands
HRS 343-5(a)(2) | <input type="checkbox"/> Amendment to a County General Plan
HRS 343-5(a)(6) |
| <input type="checkbox"/> Use of Shoreline Setback Area
HRS 343-5(a)(3) | <input type="checkbox"/> Reclassification of Conservation Lands
HRS 343-5(a)(7) |
| <input type="checkbox"/> Use of Historic Site or District
HRS 343-5(a)(4) | <input type="checkbox"/> Construction or modification of helicopter facilities
HRS 343-5(a)(8) |

OTHER CONDITIONS:

Use of Special Management Area (City & County of Honolulu)

Other* _____

**If the project does not trigger HRS 343, please explain why document is being submitted to OEQC.*

SUMMARY of the proposed action or project to be published in the OEQC Bulletin. Please submit it as a summary ready for publication. The description should be brief (330 words or less), yet provide sufficient detail to convey the full impact of the proposed action.

The State of Hawaii Convention Center Authority ("Authority") has selected Nordic/PCL to complete the design and construction of a "world-class" convention center facility on a 9.65-acre site located on the former Aloha Motors property, at 1777 Kapiolani Boulevard, Honolulu, adjacent to the intersection of Kapiolani Boulevard and Kalakaua Avenue. It is also bounded by Atkinson Drive to the northwest, Kahakai Drive to the west, and the Ala Wai Canal to the south.

The convention center is to be a four level, stand-alone facility, without additional private development on-site. The facility's gross building area will be approximately 1,106,670 square feet, including 200,000 gross square feet of exhibit space on a single level, meeting room space of 100,000 square feet, and multi-purpose ballroom area of 35,000 square feet. Approximately 800 parking spaces will be provided on-site. Future expansion space will be accommodated in the design for an additional 100,000 square feet of exhibit hall and 50,000 square feet for meeting rooms. The facility will feature many open-air gathering areas, abundant landscaping, design themes and artwork establishing a unique "Hawaiian Sense of Place."

In addition to the convention center facility, the proposed project will include road widening to mitigate traffic concerns and installation of a new sewer line to accommodate increased wastewater flows. Although all known hazardous materials have previously been removed from the site, Nordic/PCL will prepare a contingency plan complying with all State and federal regulations to be implemented in the event that unanticipated hazardous materials are encountered during construction.

Short-term impacts associated with construction of the project include those on air quality, noise, water quality, and botanical resources. Long-term impacts associated with construction of the project include those on traffic, utilities, socio-economy, scenic views, noise and air quality.

NOTE: Since the deadline for EIS submittal is so close to the publication date for the OEQC Bulletin, please assist us by bringing the Department for Publication Form and a computer disk with the project description (size 3 1/2" or 5 1/4" disk are acceptable; preferably WordPerfect 5.1 or ASCII text format) to the Office of Environmental Quality Control as early as possible. Thank you.

PUBLIC INFORMATION MEETING

**Hawai'i Convention Center Draft Environmental Impact Statement
Wednesday, February 22, 1995
7:00 p.m. to 9:30 p.m.
Washington Intermediate School Cafeteria**

AGENDA

- I. Welcome and Introduction of CCA Board Members and Guests.
Don Takaki
- II. Agenda and Format of the Meeting; Role of Facilitator and Recorder.
Leland Chang
- III. Description of the EIS and Development Process.
Mark Hastert
- IV. Introduction of Presenters and Resource Persons; Draft EIS Presentation and Computer Simulation.
Earl Matsukawa
- V. Format and Groundrules for Questions and Comments.
Leland Chang
- VI. Public Participation.
- VII. Mahalo and Goodnight.
Don Takaki

PUBLIC PARTICIPATION

Question:

There is a concern as to the direction of shuttle traffic on Kona Street. Why is Kona Street not made one-way?

Answer:

Kona Street is a private street, and the City and State have no authority to make changes.

Question:

What will happen on Kona Street during Center events?

Answer:

It will not be impacted by Convention Center traffic.

Comment:

There is a concern that there is insufficient planning for ingress and egress of emergency vehicles on Kahakai Drive. There is a concern that planning is only being done to meet the needs of the Center, not of the community.

Answer:

The residents of Kahakai Drive will benefit from a new traffic signal being located at Atkinson/Kahakai. Traffic access will be improved by this signal, and emergency vehicles will be able to get in and out.

Question:

An individual who lives on Kahakai Drive is concerned about possible toxic chemicals still remaining in the soil of the site. Will the construction cause toxic chemicals to be blown into his apartment, or will the air contain other toxic particles? Also, are there plans to mitigate the noxious fumes from the buses?

Answer:

A study of site contamination was done by the previous landowner, using historic site maps showing potential location of sources of contamination. Those locations were then excavated, and remediation performed as appropriate to the type of contamination. The site received a clean bill of health from the Department of Health and the EPA. However, if more contamination is found during the construction, the contractor is responsible for cleanup, and will have contingency plans to take care of it.

Question:

How will they know they've found something? Can there be preventive measures in place beforehand?

Answer:

They're only likely to find things like gasoline contamination, not gasses that will get into the air. If the site is still contaminated, it would be by petrochemicals, such as gasoline.

Question:

How about truck and bus fumes?

Answer:

Buses run on diesel, and don't generate much carbon monoxide. They generate another gas, nitrogen oxide, which is of concern in areas susceptible to smog, because it reacts in sunlight with other chemicals in the air. At the levels produced by Convention Center bus and truck traffic, it is not a health concern.

Question:

Can we have some emission standard for buses put in place prior to the Center opening?

Answer:

The only standards in place are related to the creation of smog.

Question:

How many buses per hour will arrive during the peak times?

Answer:

During the morning peak hours: for a convention of 10,000 people, about 60 buses during a 60 minute period; for a convention of 14,000 people, about 120 buses during a 60 minute period.

Question:

How long will it take to unload a bus? The questioner calculates that a 14,000 person convention will require 128 buses, which means that each would have 4 minutes to unload. Is that possible?

Answer:

All the buses don't arrive at the same time. We expect buses to arrive at 30 second headways. Based on our calculations, you need about 2 seconds per passenger, so 100 seconds per bus. There will be six bus berths used. Also, each bus will make several trips, so the total number of buses used will be lower.

Question:

The questioner still doubts the arrival/departure times.

Answer:

Conventions will utilize the services of professional transportation managers. The time available to drive in, unload, and leave, is 3 minutes 45 seconds, which will be enough time. Example cited: National Conference on Education, held recently in New Orleans, where street environment is similar to Waikiki. There were 25,000 attendees, and only 12 buses were needed. New Orleans, like Honolulu, is a very "walkable" city. Many attendees here are expected to walk.

Question:

The questioner is a member of the taxi industry, and comments that in 15 years they believe that the largest convention has been 8,000 people. In all cases, taxis and buses were able to cope with getting conventioners to the locations. However, the questioner would like to know where the larger conventions of 10,000 or 14,000 will come from, if we've never had one here that large?

Answer:

The larger conventions are not coming now, because we don't have the facility to handle them. When we build it, they will come. Market studies have been done, indicating that Honolulu will be able to compete with other cities for the larger conventions.

Honolulu has hosted larger conventions already, with attendees of 20,000 or more, such as the American Dental Association, the American Bankers Association, and the National Association of Realtors, over the last eight years. But they have indicated that they won't come back unless an adequate facility is built.

Question:

The surrounding area contains sites that may be developed into hotels. Has the planning taken into account the impact of future hotels, particularly in regard to traffic planning?

Answer:

Planning has looked at general development, not specific hotel sites. New hotel development will require new zoning. The traffic study has a factor for growth built into it. However, growth in the area will be substantial, with or without the Convention Center.

Comment:

A concern was raised that traffic on Kuhio Avenue should be addressed. There should be coordination among TheBus and private transportation businesses to mitigate the rush hour problems. We should consider traffic alerts to the residents, in the case of large events. The #2 Buses are already over-full at rush hours.

Answer:

The City is doing a regional traffic study to address exactly these issues. The CCA is providing input to the study, as to how Center events will impact the traffic in the area.

Comment:

For people staying in the vacation condos in Waikiki, the #2 Bus is very convenient. If there are increased visitors, we need to take into account the increased usage on these buses. Maybe we should consider adding more buses to the route during the peak hours, when there are events at the Center.

Question:

Have the people who've done the EIS actually walked in the neighborhood? Without actually walking there, you can't understand the impact of the increase in buses, trucks, and cars. How exactly will the trucks get in and out of Kahakai? The residents of Kahakai Drive understand that there will be a light at Atkinson, but how will they get out of their loop to the traffic light, if trucks and cars are lined up on the street?

Answer:

The truck bays are expected to be enclosed, so the noise will be lessened. As to getting out of the loop, maybe what's needed is a traffic control officer on event days, to assist the residents in getting in and out of the loop road. Convention Center traffic is not expected to block the street access.

Question:

Will there still be parking on Kahakai?

Answer:

Parking on the project side of Kahakai Drive will be prohibited. Parking on the makai side of Kahakai Drive may be restricted during the morning peak hours on convention days.

Question:

What about our sidewalks? They look like they're being removed, but the residents of the area do a lot of walking.

Answer:

We are currently working with the City on the sidewalk requirements along our frontage on Kahakai Drive. The City will probably require the project to construct sidewalks on our side of Kahakai Drive.

Comment:

The impact of the removal of the parking stalls will be substantial, since not every building has guest parking stalls.

Question:

What will be done to mitigate the queuing of cars on Atkinson Drive? The Atkinson Plaza driveway is on Atkinson, not on Kahakai.

Also, please add the Atkinson Plaza to the mailing list for notices related to the Center. They are not presently on the list.

Answer:

Our preliminary design shows the stop line on the makai side of the Atkinson Plaza driveway.

Question:

The questioner wonders whether there should be any parking allowed on Kahakai at all, as it might block the ingress/egress ability.

Also, has any consideration been given to covering the truck dock?

Answer:

Parking on Kahakai Drive between Atkinson Drive and the parking garage entrance will be restricted or prohibited. The architects are considering covering the dock.

Question:

Was the weekend traffic deluge figured in to the plans? From Friday at noon, through Sunday, it's worse than rush hour.

Answer:

Early Friday evening is the worst weekend peak period of traffic. The EIS analyzed two Friday night events: a national convention, and a local event.

Question:

Can you estimate how long it will take the buses to move all the people from Waikiki to the Center?

Answer:

80% will be delivered within one hour.

Question:

Will it take longer for a 14,000 person convention?

Answer:

No, there will be more buses arriving during the same one hour time period.

Comment:

A comment was made earlier that new zoning would be required for hotel development in the area. However, the City Council has already approved hotel zoning for the area.

There appears to be a conflict between the morning bus and truck arrivals, and residents trying to get out of the area to go to work. Vehicles trying to get out of Kahakai will be trying to make a left. This has been a concern from the very beginning of this process.

Answer:

A traffic control officer will be used to control the process if necessary. The planners will look more closely at the situation, to see if additional mitigation is needed.

Traffic on Kahakai will be primarily trucks, which will have a different schedule from the buses. They will not be arriving during the peak hours.

Question:

Can we mitigate the noise from the buses? Are better mufflers available?

Answer:

Fuel additives are being used for the black smoke.

Question:

But what about the noise?

Answer:

The traffic planners are not aware of any special mufflers that may lessen the noise. Usually, the loudest noise from buses is from the air conditioning units. Buses are built to Federal decibel requirements. They will try to keep the buses from sitting, with the air conditioning running, in sites where they will be heard.

Question:

The questioner comments that they have heard that there is a special muffler available that can lessen the noise level, at a cost of about \$250. Why can't it be used? Can the use of this muffler be made a requirement for any bus being used to transport attendees to an event at the Center?

Answer:

The requirement for such a device would have to be State-wide, not just for the Center.

Most transportation companies are going through major fleet upgrades at this time. In particular, brake systems used on buses with hilly routes, which are very noisy, are being upgraded. The industry is not familiar with the special muffler device mentioned. However, by the time the Center opens, the bus fleets are expected to be modernized, which will reduce the noise concerns.

Question:

The Honolulu Police Department has commented that there will be an impact from the Center on crime and traffic issues. How is this being addressed? Will a new State-funded police sub-station be planned?

Answer:

The study looked at both increased revenues to the government, and increased costs. There should be sufficient revenues generated to cover the increased costs, should it be spent in that manner.

Question:

What do we know about other convention centers and crime?

Answer:

There will be additional private security required in the Center.

Question:

What about crime in the surrounding neighborhood?

Answer:

Don't know.

Question:

Who's responsible if a neighboring building incurs damage resulting from the construction of the Center?

Answer:

The contractor will be responsible. Prior to construction, the contractor will be photographing all the surrounding buildings, and taking an inventory and assessment. If there is a damage claim, the photographs and inventory will be used to compare.

Question:

What if the damage can't be fixed?

Answer:

They have to fix it.

Question:

The EIS says that the noise level may exceed 90 decibels during events at the Center. Can anything be done to alleviate this?

Answer:

Activity noise levels will be subject to all State and City standards. Rooftop activities will have limitations.

Comment:

The residents of Yacht Harbor Tower request that the study look at ingress/egress to their building. Their driveways are on Atkinson Drive. Also, please consider such issues as a possible new parking deck at Ala Moana Center, the redevelopment of the YMCA site, and other redevelopment in the area.

Answer:

The impact of growth is being looked at. Also, the City's regional traffic study is looking at these issues.

Question:

Please explain the process from here. What happens to all the comments and questions being made at this meeting, and in writing?

Answer:

The State law regarding the filing of the EIS doesn't speak to what happens to the comments. However, the Group Memory of this meeting could be included in the EIS.

Question:

Will the Group Memory, or comments, impact the EIS?

Answer:

There will be responses in the EIS to the Group Memory and the written comments.

Comment:

The commenter reiterates that the planners responsible should actually walk in the neighborhood, and think as though they were residents of the surrounding apartments. Try to understand the impact of the noise, both of the construction, and of the Center events.

Answer:

Good point.

HAWAII CONVENTION CENTER PUBLIC INFORMATIONAL MEETING

Project: DRAFT ENVIRONMENTAL IMPACT STATEMENT

Date: February 22, 1995 Time: 7:00 p.m. to 9:30 p.m.

Location: WASHINGTON INTERMEDIATE SCHOOL CAFETERIA

S I G N U P S H E E T

NAME	ORGANIZATION (if any)	MAILING ADDRESS	Check if you'd like a copy of tonight's "group memory"
1 LARRY YASUBUCHI REF YOSHINAGA	REF. YOSHINAGA	STATE CAPITOL, Rm 962 96813	✓
2 Georgia Miller	Waikiki Residents Assoc	Suite B4c 1720 Ala Moana	✓
3 BARRY TOYOTA	None		
4 MARK GUILLERMO		60 N. BEKETANIA # 1203 96817	✓
5 DUKE BIRNHAM	City Council	Honolulu Hotel 96813	✓
6 CAROL FUKUNAGA	STATE SENATE	RM. 302, STATE OFC. TOWER	✓
7			
8			

Wilson Okamoto & Associates, Inc.

HAWAII CONVENTION CENTER PUBLIC INFORMATIONAL MEETING

Project: DRAFT ENVIRONMENTAL IMPACT STATEMENT

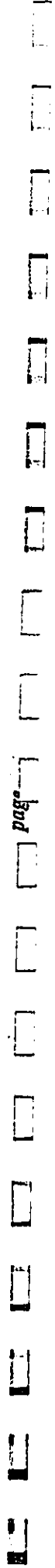
Date: February 22, 1995 Time: 7:00 p.m. to 9:30 p.m.

Location: WASHINGTON INTERMEDIATE SCHOOL CAFETERIA

S I G N - U P S H E E T

NAME	ORGANIZATION (if any)	MAILING ADDRESS	Check if you'd like a copy of tonight's "group memory"
1 Scott Kunioaka	Wilson Okamoto		
2 Jay Hara	Rep Scott Sasaki		
3 Cheryl Soren	CTC Planning Dept.		
4 Gaudi Schneideman	Atkinson Plaza	475 Atkinson Dr #1009 Hon, HI 96814	
5 RALPH UKISHIMA	PLANNING DEPT.	City & County of Hon. Hon. HI 96813 <HMB	
6 Ruyone Chong	CBS, Inc	825 Kalamokey St Suite 300 Honolulu, HI	✓
7 Henry W. Robinson	President / Board of Directors Summer Palace Association	#1503 - 1848 Kaha Kai Dr. Honolulu, HI 96814	✓
8 Sharon Young	40 Rep. Mary Jane McMurdo	State Capitol, Room 807 235 S. Beretany St. Honolulu, HI 96813	✓

Wilson Okamoto & Associates, Inc.



HAWAII CONVENTION CENTER PUBLIC INFORMATIONAL MEETING

Project: DRAFT ENVIRONMENTAL IMPACT STATEMENT
Date: February 22, 1995 Time: 7:00 p.m. to 9:30 p.m.
Location: WASHINGTON INTERMEDIATE SCHOOL CAFETERIA

S I G N - U P S H E E T			Check if you'd like a copy of tonight's "group memory"
NAME	ORGANIZATION (if any)	MAILING ADDRESS	
1 Charles Delaney		475 Atkinson Dr. #1106 Honolulu HI 96814	
2 DALE RHEE	M&E Pacific	1001 Bishop St. Suite 500 Honolulu HI 96813	
3 Harold Morse	Hon Fun-Bulletin	P.O. Box 3080 Honolulu, HI 96802	Yes
4 Ann Bouslog	KPMG Peat Marwick	POB 4150 Honolulu HI 96812	Yes
5 Robin E. Smith	Kol Senata w. I. Anderson	2005 Kalia Rd Honolulu, HI 96815	Yes.
6 JASON WYETA	HILTON HAWAIIAN VILL.	218 KUPUNA STREET KALUA HI 96734	YES.
7 ROBERT CRANE		469 E. MA RD Honolulu, HI 96815	yes
8 Frances Delaney	WNB #9		

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NAME	ORGANIZATION (if any)	MAILING ADDRESS	Check if you'd like a copy of tonight's "group memory"
1 <i>Dabacore</i>	<i>City Planning Comm. member</i>	<i>P.O. Box 90159 Hon HI 96835</i>	
2 <i>Lloyd Fujiz</i>	<i>Deloitte 2 Touche</i>	<i>1132 Bishop St Suite 1200 Honolulu 96813</i>	
3 <i>Mrs. Katoshina</i>	<i>Aerobic Club</i>	<i>685 Ardena St Hon HI 96819</i>	
4 <i>PATRICK KLEIN</i>	<i> </i>	<i> </i>	
5 <i>Ben Matsubara</i>	<i>Matsubara, Lee & Kotake</i>	<i>888 Millers St. 8th Fl Honolulu, HI 96813</i>	
6 <i>Thomas Bartus</i>		<i>475 ATKINSON DR 205 Honolulu HI 96814</i>	✓
7 <i>MARVIN CHAB</i>	<i>DTS</i>	<i>711 KAPOLANI BLVD Hon HI 96827</i>	✓
8 <i>Frank Silva</i>		<i>475 ATKINSON Dr. 1106</i>	✓

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1 HERMAN A. BING		770 Kakaia #1107 Honolulu 96814	✓
2 Anita Benfatti	WMB	430 Kaiolu St #409 Honolulu HI 96815	✓
3 D. Smith		AEA-MOANA Hobel	
4 Myron Okubo		1907 S. Beretania St #200 Honolulu 96822	
5 A. Tai	Pacific United Ltd	2423 Penn. Ave NW Wash DC 20037-1724	
6 Reenie Desilva	GRAY LINE HAWAII	435 KALEWA ST. HONOLULU, HI 96816	✓
7 JEB P BROWN	CHAIR MCCULLY/MOILILI NEIGHBORHOOD BD. 9	509 UNIVERSITY AVE., #804 Ho, HI 96826-5008	✓
8 Rodger Snow	Ala Wai Gateway Tenants Association	1819 Kipapaee St #M Honolulu, 96815	✓

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1 W.A. Kirby AIA(NE)	Self	2726-A Manoa Rd. Honolulu 96822	<input checked="" type="checkbox"/>
2 WILSON OKAMOTO	WILSON OKAMOTO & ASSOC.	1907 S. Beretania	
3 Skip Killam	Ala Moana Ctn.	1450 Ala Moana #3200	<input checked="" type="checkbox"/>
4 Ken Yantler	Inter. Assoc. of Eppo. Mgmt IAEH	1103 Lunalani St. Kailua, HI 96734	
5 Vici Higgins	HCPC	2255 Kuhio Ave #1800 Hul HI 96815	<input checked="" type="checkbox"/>
6 Allison Trifts	wilson Okamoto & ASSOC.	1125 S. King St. #203 Hon. HI 96814	
7 FAITH MIYAMOTO	DTCS	711 KAPOLANI BLVD. #300 Honolulu, HI 96813	<input checked="" type="checkbox"/>
8 HOWARD TAKARA	HPZA	711 KAPOLANI. #275 Hon, HI 96813	<input checked="" type="checkbox"/>

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NAME	ORGANIZATION (if any)	MAILING ADDRESS	Check if you'd like a copy of tonight's "group memory"
1 DUKE STURGEON	WAIKIKI NEIGHBORHOOD BOARD #7	444 MANAMA ST, #2-C HONOLULU, HI 96815	<input checked="" type="checkbox"/>
2 JULIANA WOODROSTON	HOPKINSON PLACE President PDD	475 Adkins Dr #601 96814	<input checked="" type="checkbox"/>
3 NADINE GRACE K.S. CHOW	CBI, Inc.	98-210 Pales Way Aiea, HI 96701	<input checked="" type="checkbox"/>
4 JAM BREEN	WAIKIKI NEIGHBORHOOD BOARD NEIGHBORS OF THE AREA WAI	1717 Aiea Way 96815	<input checked="" type="checkbox"/>
5 CHARLES BAREM	C+C PLANNING DEPT.	P.O. BOX 95342 96836	<input checked="" type="checkbox"/>
6 TIM HAGA		650 S. KING ST. 2TH FLOOR HONOLULU HI 96813	<input type="checkbox"/>
7 ALTON KUWOKA	CCA		<input type="checkbox"/>
8 LORI KUMIOKA	COMMITTEEMAN JOHN DESOTO	520 S. King Street, RM 202 Honolulu, HI 96803	<input checked="" type="checkbox"/>

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NAME	ORGANIZATION (if any)	MAILING ADDRESS	Check if you'd like a copy of tonight's "group memory"
1 Doug Meller	State DOT Highway Planning Branch	600 Kapiolani Blvd. Room 504 Hon. HI 96813	
2 Frank Nalbach	Metro Pacific Inc (OTOA)	PO B 29921 Hon 96820	✓
3 JACK LEVIN	CCCN CONV. CTR. COMM. NET	555 UNN. AVE. #3402 96826	✓
4 CONNIE CONRAD	planning consultant	1660 Ala Moana Blvd APT 3701	
5 Ernest Nishizaki	Royal Hawaiian Hotel	2259 Kalia Ave Honolulu, HI 96815	
6 Naomi Muraoka	The Iikui	1777 Ala Moana Blvd Honolulu, HI 96815	
7 Brenda	Star Bulletin		
8 Amelia Fritto		1125 S. King St. #203 Honolulu, HI 96814	✓

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1 BRUCE HULLRIK	MANHATTAN RESIDENT 1662	2532 KANANIWA AVE Honolulu 96815	✓
2 MIKE CARA	HCPC		
3 Dean Iverson	Liberty house	P.O. Box 2670 Hon 96845	✓
4 Marie Poyner	Summer Palace	1848 KAHAKAI RD #1801 Honolulu HI 96814	✓
5 Mrs R P BOONE	Summer Palace	1848 KAHAKAI RD #1805 Honolulu HI 96814	✓
6 Dorothy Colby		4948-4 Kilanea Ave. Hon. HI 96816	✓
7 STEVEN TERNOKA		833 HAHOLO ST	
8 TERRY WELLS	Washington Improvement Association	2270 Koloheua Honolulu 96815	✓

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1	KAY KIBBY		2726 MANDA RD, # A HONOLULU HI 96822	
2	Les Ihara, Jr.	State Senate	235 S. Beretani St. #401 96813	✓
3	Bryana Kilon	Waikiki Tenants Assoc.	2446 Cleghorn Pl Honolulu HI 96815	✓
4	<i>[Signature]</i>	WAT#6	2222 KALAKAUA	✓
5	<i>[Signature]</i>	OKA	1585 KAPIOLANI	
6	SEWARD PERKINS		2007 FERN ST.	✓
7	David muelin		912 Kaahua St.	✓
8	Leslie Kurisaki	Helber Hastert & Fee	733 Bishop St. Suite 2590 Honolulu 96813	✓

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NAME	ORGANIZATION (if any)	MAILING ADDRESS	Check if you'd like a copy of tonight's "group memory"
1 Tina Yamada	H Hotel Assoc	2270 Kalakaua Ave #1103 96815	X
2 CHRISTINA KEMMER	Office of Waikuku Dev	650 S. King St	X
3 Murray Towill	Hawaii Hotel Assoc		✓
4 Roy Tai	Impact Marketing	2938 Ualena St Honolulu HI 96819	
5 Charri Tomomuki	Tomomuki & Co.	P.O. Box 61273 Honolulu HI 96839	✓
6 Kapehu Poliaeth	WIFA	2459 Aha Kina Pl. Honolulu HI 96821 PO Box 2351	✓
7 Lorraine Kaha	DBEST	Hon 96804	✓
8 Gig Gil Senwood	C.A.C.	PO Box 22898 Honolulu 96823	✓

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1	DR. DWAN TAI	Award International Inc.	2423 Penn. Ave. NW Wash DC 20037-1724	yes
2	Alfred Liu RE: PUL	A&P Architects Engineers P.C.	2421 Penn. Ave. NW Wash DC 20037-1718	yes
3	Roy Tai	Impact Marketing 2938 Ualena St	2938 Ualena St, Honolulu, HI 96819	yes
4				
5				
6				
7				
8				

Wilson Okamoto & Associates, Inc.

PUBLIC INFORMATION MEETING

Hawai'i Convention Center Draft Environmental Impact Statement
Thursday, June 15, 1995
7:00 p.m. to 9:30 p.m.
Washington Intermediate School Cafeteria

AGENDA

- I. Opening and Welcome--Leland Chang
- II. Introductions--Mark Hastert
- III. Review of Development Process--Mark Hastert
- IV. Purpose of Meeting--Mark Hastert
- V. Review of Design Changes--Ty Sutton
 - A. Promenade Stairs.
 - B. Truck Entry Drive
 - C. Kahakai Sidewalk and Crosswalk.
- VI. Review of EIS Issues--Mark Hastert
 - A. Traffic.
 - B. Economic/Fiscal Issues.
 - C. Social Impacts.
 - D. Construction Mitigation.
 - E. Analysis of Secondary (Indirect) Impacts.
 - F. Unresolved Issues.
 - G. Alternative Convention Center Sites.
 - H. Conclusion.
- VII. Public Participation
- VIII. Wrap-Up

PUBLIC PARTICIPATION

Comment:

Regarding the Promenade and the banyan trees there: we support the current configuration of the trees, and the design improvements; especially the irrigation systems, the hardscape pathways, the walkways, and the lighting. We commend the designers and the efforts they are making to accommodate the requested and suggested changes. However, we want the configuration of the current tree plan preserved due to the historic and cultural nature of the area, and the existing banyan trees should stay where they are, and not be moved.

Response:

The Design/Build Team is meeting with the City Exceptional Tree Committee and the State Department of Historic Preservation, to discuss how to protect the trees. The Committee will make the decision on which trees can be moved. The Historic Preservation Officer wants minimal hardscape in the area. They are currently looking at moving a few trees, and if they are moved, they would go into the existing gaps where trees used to be.

Comment:

No trees should be moved. Existing gaps should be filled with new trees.

Question:

Is the Center handicap accessible from the Promenade and the Grand Stairway area? Also, where will the exhibitors and their families and workers stay while they are here for conventions? Where will they park, during the convention? Where will local attendees park?

Response:

The Promenade is handicap accessible, and there is handicap access throughout the building. An elevator is pointed out.

Exhibitors are expected to come from outside the state. Local events are not emphasized, and it is acknowledged that 800 parking stalls would not be enough. There would have to be alternative parking sites.

Question:

These are the concerns of Neighborhood Board #9. There are toxic wastes still on the site--benzine in the ground, and oil and petroleum products. What will the State do to clean this up? Also, the Board has a concern for people swimming in the ocean off the Convention Center site--will wastes wash into the ocean? What assurances do residents have for clean-up of future pollutants?

Response:

During the clean-up, the existing maps and records were examined, to determine where the contaminants might be. The clean-up team then went to those sites and removed or cleaned up the contaminants. The contaminants were mostly petrochemical, with some PCBs. The Convention Center site has received a clean bill of health from the State Department of Health. However, there is a possibility that there are other storage tanks, not identified on the maps. If any additional sites of contamination are found during construction, they will be cleaned up as they are found. The contractor is obligated to clean up contamination, according to EPA standards.

Regarding ocean water impacts: during the original investigation, holes were drilled on the downgradient to determine the impact of runoff. Based on that testing, the DOH determined how much clean-up was needed, and the clean-up met goals.

Comment:

It's still hard to accept the assumptions behind the traffic projections. Specifically, the estimate that 200-300 vehicles per hour will be going into the Center during the peak morning hours. Will that accommodate all the people trying to make a 9:00 A.M. starting time?

Response:

The traffic assumptions used in this study assume more trips than comparable studies done for mainland convention centers. There will be 700 trips in and out, distributed among all the routes. The vehicle count on the main access route is mostly shuttle buses; cars will be distributed on other routes. Four sets of traffic engineers have had input to the traffic assumptions and projections. Each traffic engineer has examined the assumptions critically.

Question:

How did you come up with the number of 700 vehicle trips during the morning peak? How many people in each type of vehicle? For a group of 10,000, my calculation comes out to approximately 1,500 trips to accommodate 6,000 people in cars and taxis, not including another 4,000 people that will come in buses.

Response:

There will be a report coming out soon, with additional detail on the traffic assumptions. At that time, the consultants offer to sit down and go over the assumptions with people who have questions. As a comment, remember that not every conventioneer will be trying to get into the Center at the exact same time--the estimate is that 65% of the attendees will be trying to get to the Center during the peak hour.

Comment:

Ala Wai Boulevard is a "shortcut" to downtown, and gets a lot of through-traffic, most of it going fast. We should alter this pattern, maybe by putting in more lights to discourage drivers from taking that route.

Question:

For the traffic engineers: have there been any follow-up studies at other projects, to see how close the pre-project projections came to actual traffic patterns, after the project was in operation?

Response:

There has not been a follow-up study at a convention center, but there have been follow-ups to other projects. The other projects were shopping centers or other commercial projects, such as office buildings, in cities such as Chicago and Los Angeles.

Question:

To enclose the truck access to the Center, don't you need the approval/consent of the adjoining property owners? That will take time.

Hawai'i Convention Center Draft EIS

6/15/95

Page 5

Response:

Yes, we do need the approvals if more than a six foot wall is built. The service road could be built with only a six foot wall, but an enclosure would be a better way to mitigate the noise. It is hoped that the neighbors will provide the necessary approvals.

Comment:

It will take a long time to get the approval of 65% of the owners of Summer Palace.

Question:

Are there now three entrances to the Center on Kahakai?

Response:

Yes--the truck access driveway, and the two ramps for cars, one entrance, one exit.

Comment:

There's only a five foot setback on Kahakai, and it looks like the Center is taking that away for the truck access.

Response:

The Center is set back five feet from the property line at the street and at the ramps. It is set back 20 feet where it is adjacent to the Summer Palace.

Comment:

Traffic flow design in Honolulu is generally illogical, due to one-way street plans.

The immediate effect of the traffic will be to make prisoners of people in their own homes, due to an inability to get out of driveways and streets. Gridlock is expected, which will have a negative impact on visitors. This is the wrong site, there's too much concrete.

Comment:

It's good that the issue of more hotel rooms has been addressed, and the figures revised. Perhaps the reference to possible need for hotel rooms should be eliminated entirely from the Draft EIS. After all, the rationale behind building the Center was to help the existing hotel plant fill its existing 20% vacancy, and we should stick to that purpose. The discussion in the Draft EIS also begs the question of where to put the proposed new hotels, and this might require rezoning.

Response:

The original Draft EIS number of 7,700 was picked up wrong in the media, as all new rooms needed. That figure has now been clarified as meaning additional room-nights. Also, we have gotten additional data on how visitors spend their time during a Hawaii trip, thanks to HVB. The peak months for conventions will be November and March, which are Hawaii's low months for visitors. There have been concerns expressed regarding the displacement of Japanese visitors from their preferred hotels. However, the larger tour operators do not seem concerned. The smaller operators do have concerns. Also, the trend with Japanese visitors is to spend more time on the neighbor islands. As to new construction, the Draft EIS estimates that the need for new hotels will range from none to three hotels. There is immense zoned capacity at other sites on Oahu. There are two sites already zoned in the Convention Center area for new hotels: at the Hilton Hawaiian Village, and at Aloha Tower.

Question:

Will the conventions fill all the existing hotel rooms, so that new hotels will be needed?

Response:

No, expect to fill 90%.

Question:

Will there be an opportunity for the public to comment on the new studies?

Response:

Not directly, as there is no formal comment period. But you can look at them and comment if you want to.

Comment:

Please look at the State law requiring a carrying capacity study of the entire state, to determine how many visitors the State can comfortably hold.

Question:

We understand that there are new hotels planned, specifically at the corner of Kona/Atkinson/Kapiolani/Kalakaua with an entrance at Kahakai; also that other buildings in the area are already planned to be razed for additional hotels and parking structures; and that a footbridge will be built. The impact of this construction is not in the Draft EIS.

Response:

The maps in the Draft EIS show the parcels that are the most likely to be developed. These were determined by looking at the existing zoning and ownership. It doesn't mean that these parcels will be developed, or that the owners have said that they will develop. The Atkinson/Mahukona/Kapiolani block is designated in the primary urban development plan for resort use. The consultants are suggesting that this parcel be removed from the master plan for resort development, because of the impact that development will have on the community.

Comment:

We agree that November is a slow month for tourism in Hawaii. However, March is usually the month for spring break, and is busy, with hotels full. So accommodating conventions during March may cause displacement problems.

Response:

Yes, we are looking at March as a month in which there may be displacement problems.

Question:

The Convention Center Newsletter says that there will be new jobs created. But you're talking about three conventions of 10,000. So, will the new jobs be permanent?

Response:

The average convention group will range from 6,200 to 7,500, when looked at on a year-round basis. Hopefully, the Center will be busy all year, with approximately 60 events per year. So there will be permanent jobs--a core group to operate the Center, as well as additional jobs for food service and business services throughout the community.

Question:

Regarding the traffic diagram with the colors: What change do you expect in the year 2000 in the blue and orange lines?

Response:

This morning, the Waikiki Regional Traffic Study discussed growth in the area, estimating 3.8% growth over the period 1995-2005.

The blue band will stay the same, because that represents traffic generated by conventions, and the number of conventions is not going to change. The big change will occur in the orange lines, which is the background (local) growth. The CCA's study uses 8.0% growth over the period 1995-2005, which is more conservative than the Waikiki Regional Traffic Study; but that means that the orange band will increase. It also included 12 identified development projects in the area, as well as other growth data from the City.

Question:

Does the 8% increase in the orange band include the areas which have been identified as likely to be developed?

Response:

No, that would be above the 8%. But the 8% growth rate is on the high side.

Question:

So, in 2005, there will be an 8% increase in background traffic, plus some additional growth from related not-yet-planned projects? Can you quantify the growth from these related projects?

Response:

We don't know where the new hotels or projects will go, or what they will be, so we can't quantify. But the City Traffic Study includes 900 new rooms by the year 2005 in Waikiki, and that's included in the projections of background growth.

Question:

There are seven new project sites on the plan, commercial or hotel, which will generate traffic. Will you be quantifying the impact of these possible projects on traffic? If you do, can you distinguish the traffic generated by the Center versus the traffic generated by these projects, which will happen regardless of whether a Center gets built?

Response:

There are no specifications or actual plans for these possible projects, so the traffic planning cannot estimate the impact; but that's why the plan uses a conservative 8% growth rate for background growth. There are 12 other projects, currently planned for the area, that do have plans and specifications, and the impact of these projects has been included. The traffic consultants feel that they have erred on the conservative side, and have anticipated high growth. But they agree that more mitigation at certain sites is necessary. A report will be out shortly.

Comment:

Can you get a possible high/low usage estimate for these seven potential sites, and include those numbers in your traffic estimates?

Response:

Using ranges would make the study confusing, but the comment is noted.

Question:

The Outdoor Circle has been working with the Committee on Exceptional Trees and the Design/Build Team regarding the banyan trees on the Promenade. They are concerned about the availability of the Promenade space for dissection in the future. The Circle and the Committee have the responsibility to preserve the space. There is no decision yet on whether to move any trees, but they prefer that no trees be moved.

Question:

The Draft EIS says that the State will see a net positive revenue from the Center of \$130 million, and that the County will see a net loss of \$3.4 million. Please clarify the numbers. If the Center generates development in the area, how will that effect the numbers?

Response:

There are changes, but the major direction is the same. The State revenue/expense ratio will approach approximately 3. The County is expected to take in less in revenues than what it will cost to provide the services to support the increased number of visitors.

Question:

Do just the expenses go up?

Response:

No, revenues and expenses go up and down together. The ratio doesn't change, just the dollar amounts.

Question:

Will the Developer make the owners whole if damages to property occur during the construction period? And when will the owners be made whole, if damage occurs? During the construction time, or after, or when?

Response:

Yes, the developer will make the owners whole. If there's documented proof that construction is causing damage, they will stop construction and fix the problem.

Comment:

I have operated taxi and tour operations. When the industry has run a shuttle system in the past, it moves with the existing flow of traffic, and there have not been problems. I urge the audience to realize that the Center will bring back jobs and business to Hawaii. Without a Center, the future of your children will be hurt.

Comment:

Thank you for holding these Public Information Meetings. The same concerns keep surfacing, which emphasizes that there must be tremendous City/State cooperation on the project for it to be successful.

Question:

Your prior response regarding handicap access from the Promenade does not address the need of people in braces, as opposed to people with wheels. Will there be sufficient access? Also, it looks like handicap access competes with vendor access. Handicap access should not be an afterthought.

Response:

Yes, there should be more than enough access for everyone. Additional access areas are pointed out. The requirements are constantly being reviewed.

Question:

The presentation mentioned that some condo rooms would be used to accommodate conventioners. Aren't there restrictions on converting residential condos to vacation usage? Have you looked at the impact on residential units in the area, if these part-time residential units convert to entirely vacation use?

Response:

The City Planning Department has informed the consultants that there are already 600 condo units in the approved vacation pool, that are presently being used partly for residential purposes. The plan anticipates that if demand for vacation rental is generated by the Center, that these units will be used more for vacation rental than residential. And we are looking at the impact on short-term residential units in the area.

PLEASE SIGN IN

Check if you'd like a copy of tonight's "Group Memory"

Name	Address	Check if you'd like a copy of tonight's "Group Memory"
Carol Fuemaga	Rm. 302, State ofc. Tower	<input checked="" type="checkbox"/>
Nora Boone	1848 Kalahehi Dr. #1805	<input checked="" type="checkbox"/>
DAN BEONE	" " " "	<input checked="" type="checkbox"/>
Leslie C. Kalahehi	1848 Kalahehi Dr. #1604 Summer Palace	<input checked="" type="checkbox"/>
Kidley T. King	1848 Kalahehi Dr. #1701 "	<input checked="" type="checkbox"/>
Letty J. Takagi	1848 Kalahehi Dr. #1701 "	<input checked="" type="checkbox"/>
Mama Ferguson	" " " # 2408 "	<input checked="" type="checkbox"/>
Roger A. Ferguson	" " " # 2408 "	<input checked="" type="checkbox"/>
Carroll George	" " " # 2108 "	<input checked="" type="checkbox"/>
George George	" " " # 2108 "	<input checked="" type="checkbox"/>
Francis R. Newett	1778 Ala Moana Blvd #1809 Honolulu, HI 96815	<input checked="" type="checkbox"/>
Murray Towill	2270 Kalahehi Ave. #1103 Honolulu, HI 96815	<input checked="" type="checkbox"/>
Bruce Y. Yamane	989 19th Ave, 807 1208	<input checked="" type="checkbox"/>
Louise Ak	2270 Kalahehi Ave 96815	<input checked="" type="checkbox"/>
PHIL WIL	1750 Kalahehi 5757 Honolulu HI 96826	<input checked="" type="checkbox"/>
TOM HEINRICH	3159 OAHU AVE. HONOLULU, HI 96822-1247	<input checked="" type="checkbox"/>
Wes Yokoyama	2671 Pomoa Rd Honolulu, HI 96822	<input checked="" type="checkbox"/>

PLEASE SIGN IN

Name	Address	IN	Check if you'd like a copy of tonight's "Group Memory"
Alfredo Trujillo	1645 AIA WAI ROAD #605 HAWAII 96815		-
Joseph E. Stangle	"		
Scott D. Hamilton	Waikiki P.O. Box 96815	0	yes
Bob Webb	1527 Young St Apt B-308 Honolulu HI 96826	0	yes
Linda W. Sparks	PO Box 240910 Honolulu HI 96824-0310	0	YES
Cecile Sullivan	1570 KANALUI ST, HONOLULU, HI 96816	0	YES
Duke Surgeon	444 MAHAHAHA ST, #2-C HONOLULU, HI 96811	0	YES
Jim McIntosh	1848 KOHAKAI DRIVE #2106 HON HI 96814	0	YES
D. Brunner	344 Dune Cir - Kailua HI 96734	0	no
J. LeVine	1720 Ala Moana Blvd Honolulu 96815	0	no
Patricia Carol	1848 Kapiolani Dr. #607 Hon. HI 96814	0	yes
Ernest J. Howe	425 Ewa Rd #601B	0	no
Edward Ammerman	44-3131B Kaneohe Bay Dr. Kaneohe HI 96744	0	yes
Marvin Chan	111 Kapiolani Blvd, Suite 1200 Hon HI 96818	0	yes
Faith Miyamoto	711 Kapiolani Blvd. Suite 300 Hon HI 96813	0	yes
Jelani Thiruganaran	220 S. King Street, 4th Floor Honolulu HI 96813	0	yes
John Harrison	EQUILIBRIUM CENTER, 2500 CAMPBELL HWY, HONOLULU HI 96822	0	yes

PLEASE SIGN IN

Check if you'd
like a copy of
tonight's "Group
Memory"

Name	Address	Memory
Anita Bentatti	430 Kaiela St. #469 Honolulu 96815	✓
Charles McClure	1212 Nuuanu Ave., Apt. 1201 96817	✓
Les Ihara, Jr.	235 S. Beretania St. #401 #96813	✓
Jason Esuna	888 Mililani Sts, Hon HI 96813	✓
Danya Yamaguchi	591 Ala Moana Blvd. #136 Hon HI 96813	✓
DOLORES SIKYIA	475 ATKINSON BLVD. #1106 HON. HI 96814	✓
Geri Ung	650 S. King St. #8th Fl-Planning Dept.	✓
RAY LILLY	1650 KAUUKU ST HONO 96814	✓
JOE MAGARDI	2101 LUUANU #2305 - 96817	
ANGELA KEEN	KIMB9 NEWS 1534 KAPIOLANI HONO HAWAII ✓	✓
HOWARD TAKARA	HON. PUBLIC TRANSIT AUTHORITY	
Pat Guerin	1142 Avahi St. Hon. HI 96814	
ALEXANDER MATSUNAGA	2251 N. School St. MASON UNION	✓
JAN BAPPE	2957 KALAKAUA AVE HON. 96815	
Charles M. Oka	28-1394 Kulawai St Aiea HI 96701	
Georgia Miller	2415 Ala Wai #1603 Hon 96815	✓
Jim Crisafulli	Business Development + Marketing Division DEPT	✓

PLEASE SIGN IN

Check if you'd like a copy of tonight's "Group Memory"

Name	Address	Memory
Brian Taniyuchi	2140 Armstrong St. Honolulu HI 96822	✓
Rep. Jim Shan	235 S. Beretania St, Rm. 1010 Honolulu 96813	✓
Yusula M. P. O. ST	1860 Ala Moana (-1302) Honolulu HI: 96815	✓
Bill Sharpe	2333 KAPPALEA BLVD, #305, HONOLULU HI 96815	
RUDY BILLY	70 COUNCIL ANDY MIRIKI TRAIL, HONOLULU HI 96815	

***DRAFT EIS
COMMENT AND RESPONSE LETTERS***



Hawai'i Convention Center

**LIST OF AGENCIES/ORGANIZATIONS/INDIVIDUALS
WHO RESPONDED TO THE DRAFT EIS**

1995-99 CITY COUNCIL

Councilmember Andy Mirikitani

OTHER ORGANIZATIONS

Convention Center Community Network
Historic Hawaii Foundation
Int'l Assoc of Exposition Mgmt, Hawaii Chptr
The League of Women Voters
The Outdoor Circle
State Independent Drivers Assn. (SIDA) Taxi

COMMUNITY ORGANIZATIONS

Ala Wai Gateway Tenants Association
Neighbors of the Ala Wai
Kapiolani Park Preservation Society
NB No. 5 - Diamond Head/Kapahulu/St. Louis Hts.
NB No. 8 - McCully/Moiliili
Marker, Nancy
NB No. 11 - Ala Moana/Kakaako
Waikiki Improvement Association
Waikiki Tenants Association

CONDOMINIUM ASSOCIATION BOARDS

1717 Ala Wai Condominium BOD
Atkinson Plaza
Discovery Bay Condos
Summer Palace Condominium BOD
Yacht Harbor Towers
Neeley & Anderson, Attorneys at Law

INDIVIDUALS

Benfatti, Anita
Boone, Nora
Brown, Jeb
Card, Patricia & Leister, Janet
Chan, David
Conrad, Connie
Delany, Frances
Diercks, John
Douglas, Geoffrey
Gelfo, E.R. Sr.
Haveman, Jeffrey
Hayward, C. Sumner & Frances E.
Hewett, Joy
Lau, Eileen

McClure, Charles
Nakagawa, Togo
Nalbach, Francis A.
Poyner, Muriel
Rodman, Robert
Silvia, Dolores
Starr, Linda W.L.
Sturgeon, Duke
Tanaka, Kay
Truesdell, Larry
Wallace, Allan
Weimer, Richard
Whiteway, Lori E.
Zivalich, Christ P., Jr.

**LIST OF AGENCIES/ORGANIZATIONS/INDIVIDUALS
WHO RESPONDED TO THE DRAFT EIS**

FEDERAL AGENCIES

Dept of the Interior, Fish and Wildlife Service
Dept of Agriculture, U.S. Soil Conserv Service

STATE OF HAWAII

Dept of Accounting and General Svcs
DB&F Housing Finance and Development Corp
DBEDT Energy Division
Dept of Education
DOH Director
DOH Clean Air Branch
DOH Environ Health Admin
DOH Office of Solid Waste Management
Dept of Labor and Industrial Relations
Dept of Land and Natural Rscs (Chair)
DLNR Historic Preservation
Dept of Transportation
Office of Environmental Quality Control
Office of Hawaiian Affairs
Office of State Planning
UH Environmental Center
UH School of Travel Industry Mgmt

EIGHTEENTH STATE LEGISLATURE

Senator Carol Fukunaga
Senator Les Ihara, Jr.
Senator Brian Taniguchi
Rep Kenneth Hiraki
Rep Mary-Jane McMurdo
Rep Scott Saiki
Rep Brian Yamane
Rep Terry Nui Yoshinaga

CITY AND COUNTY OF HONOLULU

Board of Water Supply
Building Dept.
Dept of Housing and Community Dvlpmt
Dept of Human Resources
Dept of Parks and Recreation
Dept of Public Works
Dept of Transportation Services
Dept of Wastewater Management
Fire Dept
Planning Dept
Police Dept

**HAWAI'I CONVENTION CENTER
FINAL ENVIRONMENTAL IMPACT STATEMENT DISTRIBUTION LIST**

Federal Agencies

- U.S. Department of the Interior

State Agencies

- The Honorable Benjamin Cayetano, Governor
- Department of Accounting and General Services
- Department of Budget and Finance Housing Finance and Development Corporation
- Department of Business, Economic Development and Tourism
- Department of Business, Economic Development and Tourism Library
- Department of Education
- Department of Health
- Department of Human Services
- Department of Labor and Industrial Relations
- Department of Land and Natural Resources
- Department of Land and Natural Resources State Historic Preservation Division
- Department of Transportation
- Oahu Metropolitan Planning Organization
- Office of Environmental Quality Control
- Office of Hawaiian Affairs
- Office of State Planning
- State Foundation on Culture and the Arts
- State Archives
- Legislative Reference Bureau
- University of Hawaii Environmental Center
- University of Hawaii Hamilton Library Hawaiian Collection

State Legislature

- Senator Carol Fukunaga
- Senator Les Ihara, Jr.
- Senator Brian Taniguchi
- Representative Kenneth T. Hiraki
- Representative Mary-Jane McMurdo
- Representative Scott K. Saiki
- Representative Brian Y. Yamane
- Representative Terry Nui Yoshinaga

**HAWAI'I CONVENTION CENTER
FINAL ENVIRONMENTAL IMPACT STATEMENT DISTRIBUTION LIST**

City & County of Honolulu Agencies

- The Honorable Jeremy Harris, Mayor
- Board of Water Supply
- Building Department
- Department of Housing and Community Development
- Department of Human Resources
- Department of Land Utilization
- Department of Parks and Recreation
- Department of Public Works
- Department of Transportation Services
- Department of Wastewater Management
- Fire Department
- Honolulu Public Transit Authority
- Office of Waikiki Development
- Planning Department
- Police Department
- Municipal Reference and Records Center

City Council

- Councilmember Andy Mirikitani

Utilities

- Hawaiian Electric Company
- GTE Hawaiian Tel

Other Organizations

- Hawaii Convention Park Council
- Hawaii Visitors Bureau
- International Association for Exposition Management
- Convention Center Community Network
- The Outdoor Circle

Community Organizations

- Neighborhood Board, No. 8 - McCully/Moiliili
- Neighborhood Board, No. 9 - Waikiki
- Neighborhood Board, No. 11 - Ala Moana/Kakaako

Convention Center Authority

**HAWAI'I CONVENTION CENTER
FINAL ENVIRONMENTAL IMPACT STATEMENT DISTRIBUTION LIST**

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- Kaneohe Regional Library
- Hilo Regional Library
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- Kahului Regional Library
- Manoa Library
- McCully-Moilili Library
- Waikiki-Kapahulu Library
- Liliha Library
- Kalihi-Palama Library
- Aina Haina Library
- Hawaii Kai Library

News Media

- Honolulu Star Bulletin
- Honolulu Advertiser

Individuals

- Mr. Charles Baum
- Mr. Sam Bren
- Mr. Wright Hiatt
- Ms. Robin Smith

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FINAL ENVIRONMENTAL IMPACT STATEMENT DISTRIBUTION LIST**

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- Department of Labor and Industrial Relations
- Department of Land and Natural Resources
- Department of Land and Natural Resources State Historic Preservation Division
- Department of Transportation
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- University of Hawaii Environmental Center
- University of Hawaii Hamilton Library Hawaiian Collection

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- Senator Les Ihara, Jr.
- Senator Brian Taniguchi
- Representative Kenneth T. Hiraki
- Representative Mary-Jane McMurdo
- Representative Scott K. Saiki
- Representative Brian Y. Yamane
- Representative Terry Nui Yoshinaga

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- Fire Department
- Honolulu Public Transit Authority
- Office of Waikiki Development
- Planning Department
- Police Department
- Municipal Reference and Records Center

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- Councilmember Andy Mirikitani

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- Waikiki-Kapahulu Library

News Media

- Honolulu Star Bulletin
- Honolulu Advertiser

Individuals

- Mr. Wright Hiatt
- Ms. Robin Smith

Summary of DEIS Consultation Comments

Respondents	Issues																								
	Physical				Social Economics				Public Facilities																
	Flood	Soll	Air Qual.	Noise	G. Wa. Quality	Vis.	Wal. Qd.	Reo.	Ala. Wa.	Prom.	Ream.	Surr. Nibsch.	Devel.	Employ.	Coastal.	Park.	Em. Veh.	Pod. Acc.	Pub. Tr.	Util.	Recycl.	Old. Was.	Oper. Issues	Design Issues	Econ.

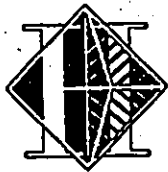
Discovery Bay Coaches			X	X									X			X								X			Legislative
Summer Palace Condominium BOD											X						X										Security
Yacht Harbor Towers																											Legislative
Nesley & Anderson, Attorneys at Law																											Legislative

INDIVIDUALS

Benfani, Anita																												
Boose, Nora			X	X																					X			
Brown, Job							X										X							X				
Card, Patricia & Leister, Janet			X				X																					
Chan, David																												no comment
Coward, Connie				X									X											X				X
Delany, Frances							X						X															X
Diercks, John																												education/childcare
Douglas, Geoffrey			X	X	X								X															
Gelfo, E.R. Sr.													X												X			
Haveman, Jeffrey																												
Hayward, C. Sumner & Frances E.																												
Hewett, Joy																												
Lau, Eileen			X	X																						X		X
McClure, Charles									X																			
Niikawa, Togo			X	X																						X		X
Niibsch, Francis A.				X																								
Poyner, Muriel																											X	
Rodman, Robert																												
Silvia, Dolores																												
Surr, Linda W.L.																												
Sturgeon, Duke				X																								
Trunka, Kay			X	X																						X		
Truesdell, Larry			X	X																								
Wallace, Allan																											X	
Weimer, Richard																												
Whiteway, Lori E.																												
Zivalich, Christ P., Jr.																										X	X	

CHAPTER ONE

FEDERAL AGENCIES
Comments Received and Responses



Hawai'i Convention Center



FISH AND WILDLIFE SERVICE

Pacific Islands Ecoregion
300 Ala Moana Blvd., Room 6307
Honolulu, Hawaii 96850

Tel: (808) 541-3441 Fax: (808) 541-3470

In Reply Refer To: AAP

FEB 13 1995

Mr. Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
FEB 16 1995

WILSON OKAMOTO & ASSOCIATES INC

Re: January 1995 Draft Environmental Impact Statement (DEIS) for the Hawai'i Convention Center in Honolulu, Oahu, Hawaii

Dear Mr. Hayashi:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced project to construct a convention center facility at the former Aloha Motors property in Honolulu, Oahu, Hawaii. The proposed convention center will be a four level, stand-alone facility consisting of an exhibit space, a meeting room, a multi-purpose ballroom area, and 800 on-site parking spaces. The center's design also provides adequate space to accommodate an exhibit hall and additional meeting rooms for future expansion of the facility. The 3.9 ha (9.65 acre) property is presently vacant and contains concrete building slabs, foundations, and asphalt pavement. The DEIS was prepared by Wilson Okamoto and Associates and the selected design/build team for the project was Nordic / PCL. The Service offers the following comments for your consideration.

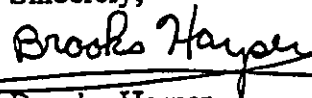
The DEIS adequately describes the existing conditions and mitigation measures for those project-related impacts generated by the construction and operation of the convention center. Measures considered to maintain the State of Hawaii's water quality include: 1) scheduled phases of construction activities that use available open land areas to contain runoff and to minimize the discharge of the dewatering effluent into the Ala Wai Canal; 2) the preparation of an acceptable erosion control plan by Nordic / PCL to the City and County of Honolulu; 3) implementation of a Best Management Practices Plan that uses siltation basins to detain sediment runoff from the project; 4) use of the existing City and County storm water drainage system to accommodate runoff from the project site; and 5) the

January 1995 DEIS
Hawaii Convention Center
Honolulu, Oahu, Hawaii

acquisition of a Department of Health National Pollutant Discharge Eliminating System (NPDES) permit if dewatered effluent from the excavated sites or storm water runoff from the project site are discharged into the Ala Wai canal.

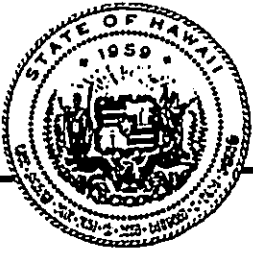
Based on the above information, no significant adverse impacts to fish and wildlife resources are expected to result from the proposed action. The Service appreciates the opportunity to provide these comments. If you have any questions regarding our comments, please do not hesitate to contact Fish and Wildlife Biologist Arlene Pangelinan at 808/541-3441.

Sincerely,



Brooks Harper
Field Supervisor
Ecological Services

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Brooks Harper
Field Supervisor, Ecological Services
Fish and Wildlife Service
300 Ala Moana Boulevard, Room 6307
Honolulu, Hawaii 96850

Dear Ms. Harper:

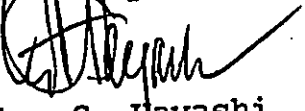
Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 13, 1995
commenting on the subject Draft EIS.

We appreciate your review and finding of no significant
adverse impacts to fish and wildlife resources from the
Convention Center development. Full compliance will be sought
relative to State water quality standards of the Department of
Health and erosion control requirements of the City and County
of Honolulu.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



United States
Department of
Agriculture

Natural
Resources
Conservation
Service

P. O. Box 50004
Honolulu, HI
96850-0001

March 17, 1995

~~Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813~~

MAR 21 1995

Subject: Comments on Volumes 1 and II of the Hawaii Convention Center Draft Environmental Impact Statement

Dear Mr. Hayashi:

We have reviewed the draft Environmental Impact Statement for the Hawaii Convention Center, and have the following comments. Due to the current effort by the State of Hawaii to improve water quality in the Ala Wai Canal, long-term management of storm water runoff should be taken into consideration:

1. Install and maintain structures to filter litter and other debris from storm water runoff Center entering the Ala Wai Canal from the Convention Center.
2. Develop a storm water runoff management system for parking areas and roadways that prevents oil and other toxic contaminants produced on the site from entering the Ala Wai Canal. Possible practices include storm water containment and filtering, filter strips, and containment of wash water when parking structure is cleaned.

Thank you for the opportunity to comment on this document.

Sincerely,

KENNETH M. KANESHIRO
State Conservationist

cc: Gary L. Gill, Office of Environmental Quality Control
Earl K. Matsukawa, Wilson Okamoto & Associates, Inc.

The Natural Resources Conservation Service
formerly the Soil Conservation Service,
is an agency of the
United States Department of Agriculture

AN EQUAL OPPORTUNITY EMPLOYER



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Kenneth M. Kaneshiro
State Conservationist
U.S. Department of Agriculture
P.O. Box 50004
Honolulu, Hawaii 96850-0001

Dear Mr. Kaneshiro:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 17, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

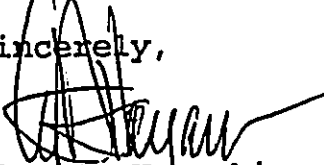
The design/builder has obtained approval by the State Department of Health of a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction. The permit requires compliance with a Best Management Practices (BMP) plan. The plan requires compliance with City ordinances pertaining to grading, grubbing, stockpiling, soil erosion and sedimentation. Structural erosion and sediment control measures include constructing berms to contain runoff and installing silt fences to trap sediment. Building and site drainage facilities and landscaping will control soil runoff after completion of the convention center.

The ongoing maintenance of a litter-free and enhanced water quality environment along the Ala Wai Canal are in the best long-term interests of the operation of the Convention Center given its proximity and visual amenity to visitors. Interior spaces including truck docks and parking areas will drain to the sanitary sewer system rather than to the Ala Wai Canal. Drainage from the Convention Center will be mostly limited to the exterior roof and planting areas, from which grated inlets and filter traps will be used to screen and prevent debris from entering the canal.

Mr. Kenneth M. Kaneshiro
July 17, 1995
Page 2

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



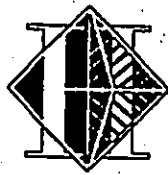
Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



CHAPTER TWO

STATE OF HAWAII
Comments Received and Responses



Hawai'i Convention Center

(P)1114.5

FEB 16 1995

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
FEB 21 1995

Attention: Mr. Alan S. Hayashi

WILSON OKAMOTO


Gentlemen:

Subject: Hawaii Convention Center
TMK 2-3-35:01
Honolulu, Hawaii
Draft EIS

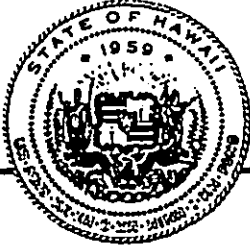
Thank you for the opportunity to review the subject document. The proposed project will have no impact on our facilities. Therefore, we have no comments to offer.

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

Very truly yours,


GORDON MATSUOKA
State Public Works Engineer

RY:jk
cc: ✓Wilson Okamoto and Associates, Inc.
OEQC



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Gordon Matsuoka
State Public Works Engineer
Department of Accounting and General Services
State of Hawaii
P.O. Box 119
Honolulu, Hawaii 96810

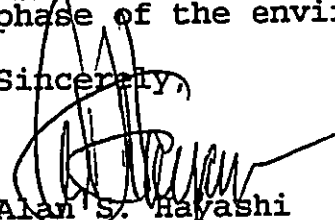
Dear Mr. Matsuoka:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 16, 1995 indicating that you have no comments on the subject Draft EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
GOVERNOR



ROY S. OSHIRO
ACTING EXECUTIVE DIRECTOR


STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE
HOUSING FINANCE AND DEVELOPMENT CORPORATION
677 QUEEN STREET, SUITE 300
HONOLULU, HAWAII 96813
FAX (808) 587-0600

IN REPLY REFER TO:
95:PPE/2316

March 21, 1995

MAR 23 1995

TO: Alan S. Hayashi, Executive Director
Convention Center Authority

FROM: Roy S. Oshiro
Acting Executive Director 

SUBJECT: Draft Environmental Impact Statement for the Proposed
Hawaii Convention Center

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

1. According to the social impact assessment, it is estimated that approximately 30% of total lodging positions, or nearly 1,400 positions, will be drawn from new in-migrants to the County, and approximately 25% of total lodging positions, or about 1,100 new in-migrants, will arrive to the State. Dependents who accompany in-migrants are anticipated to double the in-migrant population to about 2,900 new residents to the County and about 2,400 to the State.

Policy B(3) of the State Housing Functional Plan seeks to ensure that projects which impact housing provide affordable rental opportunities for employees. With the in-migration of about 1,400 new households to the City, it appears that the rental housing market on Oahu will be impacted.

2. The potential redevelopment of parcels in the area is problematic in terms of the possible displacement of existing residents and possible increases in rents. Additionally, the social impact assessment points out that if property values are enhanced, rents could also increase as a result of increases in property taxes. While the draft EIS does not propose any mitigating measures to address these probable impacts, we believe that the public

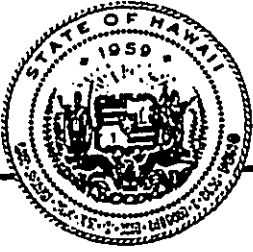


Mr. Alan S. Hayashi
Page 2
March 21, 1995

and private sectors must work together in resolving these
issues as they arise.

Thank you for the opportunity to comment.

c: OEQC
Wilson Okamoto & Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Roy S. Oshiro
Acting Executive Director
Housing Finance and Development Corporation
State of Hawaii
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Oshiro:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 21, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The Economic and Fiscal Assessment study (not the social impact assessment) provided estimates of direct, indirect and induced employment generated by the convention center project and the estimated number of new in-migrants to the County and the State that would fill those positions. The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of projected economic impact estimates, with two sets of assumptions establishing a "lower attendance and spending" scenario and a "higher attendance and spending" scenario. As a result of these revisions, the projections related in-migration to the City and State now differ slightly from those you quoted from the prior assessment. The "2,900 new residents to the County and about 2,400 to the State" is now 1,600 for the County and 2,900 to the State in the "higher attendance and spending scenario" for the year 2008. For the "lower attendance and spending scenario" in the same year, the estimates are 1,400 for the County and 2,400 for the State.

It should be emphasized that the figures refer to total in-migrant population impacts for direct, indirect and induced construction and operation employment in the year

Mr. Roy S. Oshiro
July 17, 1995
Page 2

2008. Therefore, the new in-migrants would not necessarily be Convention Center employees, but additional employees of various hotels, restaurants, shopping centers or other establishments within the County and State which experience increased business because of the convention center, as well as various employees throughout Oahu and the State that work in areas indirectly benefiting from the convention center. The latter areas may range from protea farms on Maui supplying flowers to hotels serving conventioners to a supermarket in Mililani where a hotel worker who serves conventioners may shop. Nonetheless, we acknowledge that some additional impacts would be placed on the rental housing market on Oahu.

2. The social impact assessment in the Final EIS discusses the convention center's impact on the redevelopment of nearby parcels as a secondary impact. It clearly states, however, that this impact on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

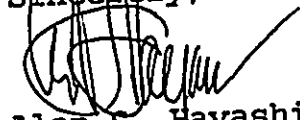
Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to

Mr. Roy S. Oshiro
July 17, 1995
Page 3

displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

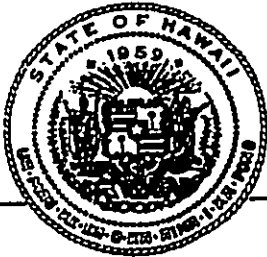
Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



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

BENJAMIN J. CAYETANO
Governor
SEJI F. NAYA
Director
RICK EGGED
Deputy Director

ENERGY DIVISION, 335 MERCHANT ST., RM. 110, HONOLULU, HAWAII 96813 PHONE: (808) 587-3800 FAX: (808) 587-3820

February 7, 1995

RECEIVED
FEB 13 1995

Mr. Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 222
Honolulu, Hawaii 96813

WILSON OKAMOTO & ASSOC. INC.

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement (Draft EIS)
Hawaii Convention Center
Tax Map Key: 2-3-35: 01
Honolulu, Oahu, Hawaii

Thank you for the opportunity to provide comments on the Draft EIS for the Convention Center. We have no further comments to our early consultation letter of April 4, 1994, and our EA comment letter of June 2, 1994.

We note that the proposed Convention Center conforms with the Hawaii Model Energy Code of July 1993 as required by the Request for Proposal. We appreciate your consideration of the project's compliance with the State Environmental Policy and the Hawaii State Planning Act as you proceed.

If you have any questions or need clarification regarding the Model Energy Code or Hawaii State Planning Act as it applies to energy, please contact me at 587-3807.

Sincerely,

Maurice H. Kaya
Energy Program Administrator

ER:

cc: Wilson Okamoto & Associates, Inc.
OEQC



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

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

Dear Mr. Kaya:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 7, 1995 indicating that you have no further comments on the subject Draft EIS. Thank you for acknowledging that the Convention Center conforms with the Hawaii Model Energy Code.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Benjamin J. Cayetano
GOVERNOR

HERMAN M. AIZAWA, Ph.D.
SUPERINTENDENT



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

February 22, 1995

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

ATTN: Alan S. Hayashi

Dear Mr. Hayashi:

SUBJECT: Draft Environmental Impact Statement
Hawai'i Convention Center
Honolulu, Oahu, Hawaii
TMK: 2-3-35: 01

We have reviewed the subject Draft Environmental Impact Statement and have determined that the proposed convention center will have no impact on the public schools in the area.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Herman M. Aizawa".

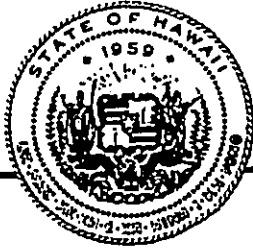
Herman M. Aizawa, Ph.D.
Superintendent

HMA:jml(AH)

cc: A. Suga
J. Sosa, HDO
Office of Environmental Quality Control
✓ Wilson Okamoto & Associates, Inc.

RECEIVED
FEB 22 1995

WILSON OKAMOTO & ASSOCIATES, INC.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Herman M. Aizawa, Ph.D.
Superintendent
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Dr. Aizawa:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 22, 1995, indicating that you have no further comments on the subject Draft EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



LAWRENCE M. MILES
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

March 24, 1995

In reply, please refer to:

HEER OFFICE 95-0

RECEIVED
MAR 28 1995
Convention

Convention Center Authority
The State of Hawaii
841 Bishop Street, room 2222
Honolulu, Hawaii 96813
Attn: Alan S. Hayashi

WILSON OKAMOTO & ASSOC., INC.

Dear Sirs:

Here are the Department of Health's written comments on the Hawai'i Convention Center Draft Environmental Impact Statement, Volumes I and II, dated January, 1995.

Previous sampling for chemically-contaminated soil or water on the Convention Center site did not completely cover the site. Instead, the sampling was only directed at areas where chemical spills were most likely to be found, judging from past records and known activities on the site. Where the sampling found excessively contaminated soil or water, clean-up was then accomplished to the satisfaction of the Department of Health's Solid and Hazardous Waste Branch.

The Branch's "No Further Action" letter stated that no further clean-up actions of that known contamination were required. Also, the site's owner remains liable for additional clean-up actions if warranted.

If construction activities uncover gross contamination of soil or water, which will be indicated by any smell or oily appearance, it would be prudent to stop construction and withdraw until the possible health risk to workers or the public is evaluated. In accordance with the Hawaii Revised Statutes, chapters 128-D and 342-L, the Department of Health must be notified. Please call the Solid and Hazardous Waste Branch (586-4226) and the Hazard Evaluation and Emergency Response Office (HEER, 586-4249) for guidance and assistance.

As discussed previously between the Convention Center Authority and Steve Armann of the HEER Office, the HEER Office should review the contingency plan.

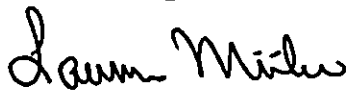
Thank you.

Convention Center Authority

March 24, 1995

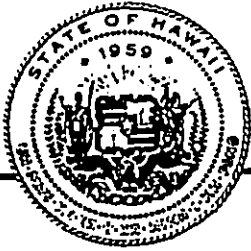
Page 2

Sincerely,



LAWRENCE MIIKE
Director of Health

cc: Office of Environmental Quality Control
Wilson Okamoto and Associates, Inc.
Steve Chang, Chief, SHWB, DOH ----
Steve Armann, Chief, HEER Office, DOH
Charles Baum



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Lawrence Miike, M.D.
Director of Health
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Dr. Miike:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995
commenting on the subject Draft EIS.

We appreciate the cooperation and assistance of the Department
of Health in reviewing our hazardous materials studies,
sampling, and subsequent clean-up efforts. Notwithstanding
your "No Further Action" letter of April 1993, we acknowledge
our continuing responsibility to comply with all State and
Federal requirements for remediation in the event that any
further contamination is discovered during construction.
Toward this end, the design/builder has prepared a contingency
plan to be implemented in the event that hazardous materials
are discovered during construction.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



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

COPY

LAWRENCE MI I KE
DIRECTOR OF HEALTH

In reply, please refer to:
EMD-CAB

March 24, 1995

95-A140

Alan S. Hayashi, Executive Director
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, HI 96813

Dear Mr. Hayashi:

Subject: Comments on Draft Environmental Impact Statement (DEIS)
Hawaii Convention Center
Tax Map Key: 2-3-35:01, Honolulu, Oahu

The Department of Health has the following comments on the DEIS for the subject project:

1. In Appendix E, pp. 20 and 23, the DEIS states "Estimates of eight-hour concentrations (of carbon monoxide) can be derived by applying a 'persistence' factor to the one-hour concentrations....EPA has *in the past* recommended calculation of a persistence factor based on actual 1-hour and 8-hour CO measurements, or in the absence of such data, use of a 0.6 value." Reference [22]

The reference [22] cited is dated 1978. The date of this reference and the curious inclusion of the phrase "in the past" raises a question. Does the Environmental Protection Agency (EPA) still recommend this same procedure?
2. On page 23, Table 4, the EPA recommended "persistence factor" of 0.6 shows the projected levels of carbon monoxide (CO) to exceed the state and federal limits (5 and 10 ug/m³ CO emission concentrations for 8-hour state and federal ambient air quality standards) for both 10,000 and 14,000 events during the a.m. and p.m. peak hours. The DEIS study uses a persistence factor of 0.5. By using a persistence factor other than that recommended by the EPA (questionable validity), estimated levels drop to barely within federal standards and still exceed state standards.
3. The 8-hour CO projections were based on outdated CO data. Data used to input into the air quality model was obtained from 1984 and 1987, respectively. The data from 1990 should have been used. In addition, the methodology employed to derive the 8-hour CO estimates used data collected in Waikiki at 2131 Kalakaua Avenue. The data collected at the Waikiki location appeared to reflect the ambient CO levels at that location, but does not realistically reflect the conditions at Kapiolani and Kalakaua (which is known to have the worst air quality in the state). These results, even after questionable manipulation, still

Mr. Alan S. Hayashi
March 24, 1995
Page 2

indicate that the traffic situation at this site is unacceptable as planned according to state limits for pollution, and reflect an environmental situation not at all conducive to a "Hawaiian Sense of Place."

Please note that the Clean Air Branch of the Department of Health reserves the right to submit additional comments on the DEIS or any future EIS.

If you have any questions, please call Mr. Carl Ibaan of my staff at (808) 586-4200.

Sincerely,

Wilfred K. Nagamine

WILFRED K. NAGAMINE, P.E.
Manager, Clean Air Branch

CI/sk

c: Gary L. Gill, OEQC
Earl K. Matsukawa
Wilson Okamoto & Associates, Inc.
P.O. Box 3530
Honolulu, HI 96811



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Wilfred K. Nagamine, P.E.
Manager
Clean Air Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Nagamine:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The preferred method of computing the persistence factor is still based on the use of Carbon Monoxide (CO) monitoring data in the vicinity of the site (EPS-454/R-92-0005). As indicated in the Air Quality Study (Appendix E, p.23), both this study and previous studies have computed persistence factors based on local CO data and found values in the 0.5 - 0.6 range. EPA default values are only recommended in the absence of local monitoring data.
2. The Air Quality Study did use an EPA-recommended persistence factor. As indicated above, the recommended procedure for developing a persistence factor is by using local CO monitoring data. The default value is only recommended by EPA in the absence of local monitoring data.
3. Data input to the CAL3QHC model included traffic projections, the latest MOBILE-5A emission factors, and "worst case" meteorology. CO Data for 1984 or 1987 were used only to compute persistence factors. Since such factors are in large part a function of local meteorology, no significant year-to-year differences were expected. In response to your comment, however, the latest available CO data for the Waikiki station (1993) was obtained from the State Department of Health. The

Wilfred K. Nagamine, P.E.
July 17, 1995
Page 2

computed persistence factor based on that data set was 0.47, somewhat lower than the 0.5 - 0.6 cited by the Air Quality Impact Report. The revised analysis will be included in the Final EIS air quality study.

The use of CO data from a nearby site to compute a persistence factor is acceptable and appropriate. Rarely will one have a CO monitoring station located at the site of a proposed project. In this instance, we were fortunate to have the Waikiki station so close. The persistence factor is simply a ratio of the highest 8-hour to 1-hour CO concentrations and reflects traffic volume and meteorological conditions throughout the 8-hour period. We would not expect great differences in ratios for sites in heavy traffic areas of urban Honolulu. The 1993 data for the CO station at the DOH building on Punchbowl Street reveals a value of 0.40. The prevalence of trade winds tends to make the ratios lower because the morning calm conditions which produce the maximum 1-hour CO levels do not persist for 8 hours.

As for the Kalakaua - Kapiolani intersection having the "worst air quality in the state", we believe that reference was based on modeling and not actual measurements. Nevertheless, the Center is oriented with its main entrance facing the Atkinson-Kalakaua intersection, removing it somewhat from the direct impacts of the prevailing northern tradewinds at the Kalakaua-Kapiolani intersection.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Benjamin J. Cayetano
GOVERNOR OF HAWAII



Lawrence Milke
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

March 13, 1995

Ms. Frances Yamata
Wilson Okamoto & Associates, Inc.
1907 South Beretania Street
Honolulu, Hawaii 96826

Dear Ms. Yamata:

Subject: Draft Environmental Impact Statement (Draft EIS)
Hawaii Convention Center
Tax Map Key: 2-3-35: 01
Honolulu, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject project. We have the following comments to offer:

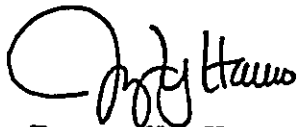
1. The facility should be designed as to minimize the potential noise impacts on the surrounding residences.
2. Potential noise problems may occur in areas designated for commercial activities. Noise associated with commercial activities, such as heavy delivery trucks, refuse collection, vehicular traffic (tour buses), etc. may result in adverse noise impacts to the surrounding residences. Mitigative measures should be implemented toward minimizing noise impacts from such commercial sites.
3. Through facility design, sound levels emanating from stationary equipment such as emergency electrical generators, air conditioning systems, or exhaust fans must be attenuated to comply with the provisions of Administrative Rules, Title 11, Chapter 43, "Community Noise Control for Oahu".
4. Noise from entertainment activities associated with such development, including sound production and reproduction devices (such as amplified sound systems or paging systems), may impact the surrounding residences in terms of annoyances.

Ms. Frances Yamata
Page 2
March 13, 1995

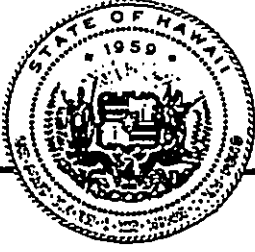
5. Noise associated with parking garages and loading dock area (such as tire squeal, or back-up alarms) may impact the surrounding residences in terms of annoyances.
6. Adverse noise impacts to the surrounding residences may occur from pile driving activities. Mitigative measures should be implemented toward minimizing noise impacts from such activity.
7. Construction activities must comply with the provisions of Administrative Rules, Title 11, Chapter 43, "Community Noise Control for Oahu".
 - a. The contractor must obtain a noise permit if the noise levels from construction activities are expected to exceed the allowable noise 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 pertaining to construction activities as specified in the rules and the conditions issued with the permit.
8. Heavy vehicles travelling to and from the project site should be minimized within residential areas and must comply with the Administrative Rules, Title 11, Chapter 42, "Vehicular Noise Control for Oahu".

Should there be any questions, please call me at 586-4701.

Very truly yours,



Jerry Y. Haruno
Environmental Health Program Manager
Noise and Radiation Branch



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Jerry Y. Haruno
Environmental Health Program Manager
Noise and Radiation Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Haruno:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 13, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

We concur with the comments expressed and have incorporated numerous mitigating measures in the design, construction and operation of the Convention Center.

1. Facility Design. The design of the convention center contributes to minimizing noise impacts from the shuttle bus operations. The three-lane main entry drive fronting the lobby is the primary arrival and departure point for shuttle buses transporting conventioners. This one-way drive should not require reversing movements of buses. Although the main entry drive could accommodate up to six shuttle buses at one time, the total dwell time (total time that the bus is stopped to service passengers) for passenger loading/unloading would average only about 2 minutes 30 seconds per bus. This relatively short idling time would reduce the duration for running air-conditioning units, which is one of the loudest sources of bus noise.
- 2&8. Noise from commercial activities (tour buses, heavy vehicles/trucks, and refuse collection). Your concerns that potential noise problems may occur in areas designated for commercial activities are acknowledged. Please be apprised that the loading dock is fully enclosed and is contained entirely within the convention center site at ground level adjacent to the Ala Wai

Mr. Jerry Y. Haruno
July 17, 1995
Page 2

Promenade. All truck loading/unloading activities, as well as trash removal, will occur within the loading dock area which is designed with provisions for a turnaround area. Also, due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the State Convention Center Authority (CCA) and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State Department of Health (DOH) Administrative Rules, Title 11, Chapter 42, "Vehicular Noise Control for Oahu", with respect to vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

3. Mechanical equipment noise. The Convention Center's mechanical equipment will use sound treatment and appropriately insulated housing to comply with the DOH noise limits and minimize risks of noise impacts on neighboring properties.
4. Entertainment activity noise. The noise study prepared for the EIS identifies mitigation measures with respect to functions which may be held on the convention center's roof terrace assembly area. The study indicates that while amplified music or voice levels of 80 to 90 dB may be required in order to insure the intelligibility of music vocal performances or voice announcements over the entire assembly area, such noise levels could generate adverse impacts at the neighboring properties, and probably exceed the State DOH daytime limit of 60 dB. For these reasons, the study indicates that use of the roof terrace area for large assemblies requiring amplification is not recommended unless special noise mitigation measures are employed, such as the use of portable enclosures to house large assemblies and/or small groups when amplified sound systems are required. The design of these enclosures should allow for a minimum of 30 dB of noise reduction or to limit noise emissions to levels below the applicable State DOH noise limits.
5. Parking garage noise. Within the parking garage, non-slick roadway surfaces and acoustic fire-proofing on the ceiling and structural members will attenuate parking garage noise levels. Also, as part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may be audible at nearby dwelling units along Kahakai Drive.
6. Pile-driving noise. The means of muffling pile drivers are described on pages 36 and 37 of the noise study. As indicated in the noise study, noise impacts during the construction period are unavoidable, but temporary. Likewise, it is indicated that noise levels, especially from pile driving activities, may be degraded to unacceptable levels during construction. Construction operations will adhere to the State DOH noise standards

Mr. Jerry Y. Haruno
July 17, 1995
Page 4

which imposes construction curfew times. Within the project site, pre-drilling through the upper coral layer will be provided for piles to be set in the lower coral layer. This will reduce noise by reducing the number of blows which would otherwise be required to penetrate the upper coral layer.

7. Construction noise. To minimize the potential noise impacts on surrounding residences, construction activities will be required to comply with the State DOH Administrative Rules, Title 11, Chapter 43, "Community Noise Control for Oahu". A noise permit will be obtained if construction noise levels are expected to exceed allowable noise levels, while on-site equipment and vehicles requiring an exhaust of gas or air will be required to have mufflers. Along the project side of Kahakai Drive, the use of construction noise barriers approximately 16 feet high will reduce construction noise by 5 to 20 dB at low and mid-rise receptors.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



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

LAWRENCE MIKE
DIRECTOR OF HEALTH

In reply, please refer to:
EMD/SHW

March 21, 1995

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
MAR 29 1995

WILSON OKAMOTO & ASSOC. INC.

Dear Mr. Alan Hayashi:

Thank you for the opportunity to review and comment on the Hawaii Convention Center Draft EIS. We emphasize that the State's waste reduction goals target 50% waste reduction by the year 2000. We commend the Convention Center Authority for committing to recycling of construction debris, and for incorporating several recycling operation features into the Convention Center design.

Since the Hawaii Convention Center will be a landmark project, we recommend the incorporation of secondary resources into the building project whenever feasible. Plastic lumber, glassphalt, and locally produced compost are examples of building materials made as a result of local recycling efforts. By incorporating these resources into the Convention Center design, you are supporting the development of a local recycling industry, which will benefit both the local economy and the environment. We would be glad to set up a meeting or series of meetings to introduce your architects and landscape architects to these products and local manufacturers.

Should you have any questions, please contact Ms. Carrie McCabe of the Office of Solid Waste Management at 586-4240.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Harder".

John D. Harder, Coordinator
Office of Solid Waste Management

cc: Mr. Gary Gill, OEQC
Mr. Earl K. Matsukawa, Wilson Okamoto & Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. John D. Harder
Coordinator
Office of Solid Waste Management
Department of Health
State of Hawaii
Honolulu, Hawaii 96801

Dear Mr. Harder:

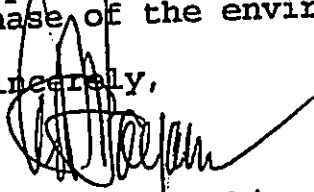
Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 21, 1995
commenting on the subject Draft EIS.

We appreciate your supportive comments on our efforts to
incorporate waste reduction and recycling programs into the
Convention Center's design. Your suggestion and offer of
assistance regarding the potential use of secondary recycled
building materials such as plastic lumber, glassphalt, and
locally produced compost has been referred to the
design/builder for their consideration.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 22, 1995

MAR 21 1995

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

The Hawaii State Department of Labor and Industrial Relations has received the Draft Environmental Impact Statement (EIS) for the Hawaii Convention Center (HCC) on Oahu.

According to the EIS, the project will generate short-term employment during the construction of the facility and long-term employment in the operation and support of the convention center. About 960 direct and 1,510 indirect and induced jobs will be generated during the three-year construction phase. Total direct, indirect, and induced employment from the operation of HCC is estimated to represent about 8,900 full-time equivalent positions per year by the time HCC reaches stabilization (year 2008). Slightly more than one-half of these positions will be in lodging facilities. The project will provide some much-needed employment opportunities in the construction industry and in the other sectors of the state's economy. The department would like to offer its assistance in recruiting job applicants to fill these demands through its various employment and training agencies.

Thank you for the opportunity to review the draft EIS. If there are any questions, please call Naomi Harada, Acting Chief of our Research and Statistics Office, at 586-9030.

Sincerely,

Lorraine H. Akiba
Director

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Lorraine H. Akiba
Director
Department of Labor and Industrial Relations
State of Hawaii
830 Punchbowl Street
Honolulu, Hawaii 96813

Dear Ms. Akiba:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 22, 1995 commenting on the subject Draft EIS.

We appreciate your supportive comments on the positive effects of the Convention Center's construction and operations on expanding employment opportunities and improving the State's economy.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received in the Draft EIS. One of the revisions is the presentation of an estimated range of impacts. The range is defined by one set of assumptions based on a lower attendance and spending rate while the other set assumes a higher attendance and spending rate.

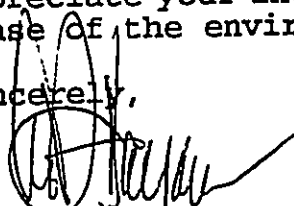
While the direct and induced construction employment estimates remain the same as in the Draft EIS for both set of assumptions, the operational period estimates have been revised. Total direct, indirect, and induced employment from the operation of the convention center, based on the lower and higher assumptions, is estimated to represent between 7,900 and 9,500 positions, respectively, in the stabilized year 2008.

Your kind offer of assistance in recruiting employees through the various employment and training agencies will be communicated to the design/builder and the Convention Center operator.

Ms. Lorraine H. Akiba
July 17, 1995
Page 2

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
Governor of Hawaii



STATE OF HAWAII

REF: OCEA: DKP

DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. Box 621
Honolulu, Hawaii 96809

FILE NO.: 95-367

Mr. Alan S. Hayashi, Executive Director
Hawaii Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

MAR 29 1995

Chairperson
MICHAEL D. WILSON
Board of Land and Natural Resources

Deputy Director
GILBERT COLOMA-AGARAN

Aquaculture Development
Aquatic Resources
Boating and Ocean Recreation
Bureau of Conveyances
Conservation and Environmental Affairs
Conservation and Resources Enforcement
Forestry and Wildlife
Historic Preservation
Land Management
State Parks
Water and Land Development

RECEIVED
MAR 31 1995

Dear Mr. Hayashi:

WILSON GRAMOTO & ASSOC., INC.

SUBJECT: Draft Environmental Impact Statement (DEIS):
Hawaii Convention Center, Honolulu, Oahu;
TMK: 2-3-35: 01

We have reviewed the DEIS information for the subject project transmitted by your memorandum dated January 27, 1995, and have the following comments:

Division of Aquatic Resources

The Division of Aquatic Resources (DAR) comments that their main concern would be in the area of wastewater discharge. Construction discharges, while primarily planned to be underground, could add more sediment to the already heavily silted Ala Wai Canal through above ground flows. To the extent possible, such discharges should be prevented.

Historic Preservation Division

The Historic Preservation Division (HPD) comments that the adverse effect of the terraced landscape park encroaching 26' onto the Ala Wai Canal promenade needs to be addressed in the Environmental Impact Statement. Pre-Assessment consultation in May, 1994, state, "The existing promenade to the canal side of the site should be maintained since it is an important contribution to the canal setting." Therefore, the terraces should be set back 26' from the present design to maintain the width and feel of the existing promenade.

The DEIS includes as an Appendix D, an end-of-fieldwork report for the archaeological inventory survey. HPD looks forward to reviewing the completed inventory survey report when it is available. HPD anticipates that this report will provide the information needed to determine the effect of the project on historic sites. Once the project's effect has been determined, HPD will be in a position to comment on the need for mitigation procedures.

Division of Land Management

The Division of Land Management (DLM) comments that it has no objections to the development of the Convention Center at the subject site so far as it is consistent with the Legislative approval of HB No. 27-93.

DLM finds that the Convention Center has no significant detrimental impact to State owned land managed by DLM which are either near or surrounding the Convention Center site.

Future planned projects by other governmental agencies and private developers may contribute to service congestion within the area of Waikiki, Honolulu, Kakaako (Keeaumoku to South Street and South Street to Waterfront) and the surrounding area.

Division of Water and Land Development

The Division of Water and Land Development (DOWALD) comments that:

1. According the FEMA's FIRM panel No. 15001-0120C (dated Sept. 4, 1987), the project site is located in Zone A (special flood hazard areas inundated by the 100-year flood).
2. Future on-site runoff increase or decrease may be insignificant.
3. The EIS did not address the impact, due to mass filling in the flood hazard area, of the stream water flow to the upstream areas during the Q100 event.

The convention center is not located on the floodway, but still located in the flood inundation (water flow) areas. The massive filling for the convention center development, such as for the berm around the building, vehicle entry/out ramp, landscaped first and second level terraces and stairway, trees in Ala Wai Promenade park may impede the flood flow during the Q100 flood. It is necessary that future stream conveyance capacity after the development were completed should be larger than the existing stream conveyance capacity, to assure no water level rise, no increased flood potential to the upstream Ala Wai canal areas; or it is necessary to conduct the drainage and hydraulic studies to assure no significant increased flood damages due to water level rise for the proposed design (development).

Mr. A. Hayashi

- 3 -

File No.: 95-367

Division of Water and Land Development (continued...)

4. Need to obtain a City's variance approval to build the convention center in the flood hazard area.

The first floor elevation should be higher than the regulated water level.

The proposed lowest first floor level +7 ft. was established by the City Department of Land Utilization (not the FEMA) based on the flood study conducted for the project site in conjunction with a prior convention center complex proposal. The 1987 FIRM (panel 120) shows the site is designated as Zone A, no base flood elevations determined. Since the site is located nearby Ala Wai Canal mouth (Zone AE, El 5 ft), far away from Manoa-Palolo Drainage Channel mouth (Zone AE, slightly less than El 7 ft), it is highly likely the necessary FEMA's regulatory water level would be El 6 ft (or lesser), instead of 7 ft. By selecting 6 ft as a lowest floor elevation, the development cost can be saved some. (Note: It is better to review the previous report of study new hydrology and hydraulics to conform that, if the 7 ft will be selected.)

The last maintenance dredging was conducted in 1978. Since the Canal has not been dredged more than 10 years, the + 7 ft might be a good choice if the anticipated siltation problems, as follows, was taken into consideration.

The estimated sediment deposition rates made by Gonzalez (1971) of 8 to 11 inches/year appear to generally hold true today... Compared with the 1971 canal bed elevations, is it true the canal bed raises about 10 to 14 ft from 1978 to now (1995)?

Cleaning the Ala Wai Canal on schedule should be considered in the future convention maintenance schedules.

We have no further comment to offer at this time. Thank you for the opportunity to comment on this matter.

Please feel free to contact Steve Tagawa of our Office on Conservation and Environmental Affairs, at 587-0377, should you have any questions.

Aloha,

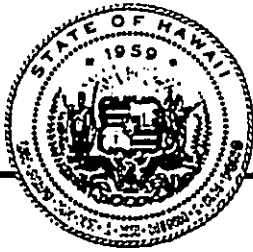
Michael D. Wilson
MICHAEL D. WILSON

Mr. A. Hayashi

- 4 -

File No.: 95-367

c: OEQC
Earl Matsukawa, Wilson Okamoto & Assoc. Inc.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Michael D. Wilson
Director
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Wilson:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 29, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. Division of Aquatic Resources. The design/builder has obtained approval by the State Department of Health of a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction. The permit requires compliance with a Best Management Practices (BMP) plan. The plan requires compliance with City ordinances pertaining to grading, grubbing, stockpiling, soil erosion and sedimentation. Structural erosion and sediment control measures include constructing berms to contain runoff and installing silt fences to trap sediment. Building and site drainage facilities and landscaping will control soil runoff after completion of the convention center.

To control dewatering effluent discharges, the design/builder is required to obtain an NPDES General Permit for Construction Activity Dewatering. The permit application, which has yet to be approved, offers a BMP plan that eliminates the need to discharge dewatering effluent except, possibly, during heavy or prolonged storm events. Hence, the permit is requested only for emergency discharges during such storm events. To avoid discharging the effluent, retention basins, which may include excavations needed for construction, will hold the effluent until it can percolate back into the ground. In the event of a large or prolonged storm, the retention basins will serve as detention basins, holding the

Mr. Michael D. Wilson
July 17, 1995
Page 2

effluent long enough to allow sediments to settle out before it is discharged. Other required sediment reduction methods include lining excavations with filter fabrics to reduce the amount of sediment entering the effluent and using filters on intake lines.

2. Historic Preservation Division. Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

We recognize that the SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

The final archaeological inventory survey report will be submitted to your office for review and approval upon its completion anticipated by mid-July 1995.

3. Division of Land Management. We acknowledge your comment that the Division of Land Management (DLM) has no objections to the development of the convention center at

Mr. Michael D. Wilson
July 17, 1995
Page 3

the subject site so far as it is consistent with the Legislative approval of HB No. 27-93.

We also acknowledge your comment that the convention center has no significant detrimental impact to State-owned land managed by DLM which are either near or surrounding the convention center site.

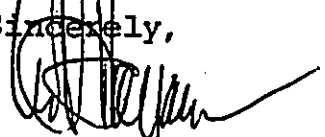
We concur that future planned projects of other governmental agencies and private developers may contribute to service congestion within the area of Waikiki, Honolulu, Kakaako (Keeaumoku to South Street and South Street to Waterfront) and the surrounding area. The developer for each project would be responsible to assess the traffic impacts and provide mitigation measures to reduce the impacts accordingly. Furthermore, the increase of traffic from these projects would be more appropriately addressed through the City's Waikiki Regional Traffic Impact Plan which is currently being prepared and anticipated for completion by August 1995. The study area limits for the City's regional study are the H-1 Freeway, Pensacola Street, Ala Moana Boulevard/Kalakaua Avenue, and Kapahulu Avenue.

4. Division of Water and Land Development. In conformance with the City's Land Use Ordinance requirements, the lowest occupied floor (the Exhibition Hall) will be elevated 7 feet above mean sea level. We disagree with the expressed need for a variance approval from the City and County of Honolulu, as the project will be in compliance with the development requirements for both the AO and A Flood Zones. The building mass for the Convention Center will result in a slight increase in the flood elevation for the area, however, there is no regulatory requirement to ensure that there will be adequate stream conveyance capacity to accommodate the 100-year flood. We concur that the Ala Wai Canal should undergo maintenance dredging to improve the conveyance of storm water flows and improve water quality, however, we do not feel that this should be the sole responsibility of the Hawaii Convention Center.

Mr. Michael D. Wilson
July 17, 1995
Page 4

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



COPY

STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 6TH FLOOR
HONOLULU, HAWAII 96813

MICHAEL D. WILSON, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

DEPUTY
GILBERT COLOMA-AGARAN

AQUACULTURE DEVELOPMENT
PROGRAM

AQUATIC RESOURCES
CONSERVATION AND

ENVIRONMENTAL AFFAIRS
CONSERVATION AND

RESOURCES ENFORCEMENT
CONVEYANCES

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION

DIVISION
LAND MANAGEMENT

STATE PARKS
WATER AND LAND DEVELOPMENT

February 17, 1995

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

ATTN: Alan S. Hayashi

LOG NO: 13862
DOC NO: 9502TD10

RECEIVED
FEB 21 1995

Dear Mr. Hayashi:

WILSON - MARCH

**SUBJECT: Draft Environmental Impact Statement (Draft EIS)
Hawaii Convention Center - Waikiki, Kona, O'ahu
TMK: 2-3-35: 1**

Thank you for the opportunity to review this Draft EIS.

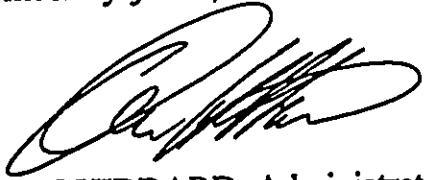
The adverse effect of the terraced landscape park encroaching 26' onto the Ala Wai Canal promenade needs to be addressed in the Environmental Impact Statement. Pre-assessment consultation in May, 1994 stated, "The existing promenade to the canal side of the site should be maintained since it is an important contribution to the canal setting." Therefore, the terraces should be set back 26' from the present design to maintain the width and feel of the existing promenade. If you would like to discuss alternatives, please call Tonia Moy at 587-0005.

The Draft EIS includes as Appendix D an end-of-fieldwork report for the archaeological inventory survey. We look forward to reviewing the completed inventory survey report when it is available. We anticipate that this report will provide the information needed to determine the effect of the project on historic sites. Once the project's effect has been determined we will be in a position to comment on the need for mitigation procedures.

A. Hayashi
Page 2

If you have any questions about the archaeological review please call Tom Dye at 587-0014.

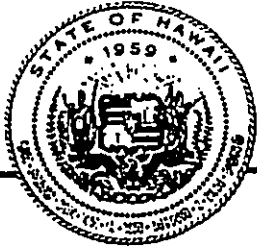
Sincerely yours,



DON HIBBARD, Administrator
State Historic Preservation Division

TD:amk

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Don Hibbard
Administrator
State Historic Preservation Division
State of Hawaii
33 South King Street, 6th Floor
Honolulu, Hawaii 96813

Dear Mr. Hibbard:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 17, 1995 commenting on the subject Draft EIS.

Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawaii'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

We recognize that the SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

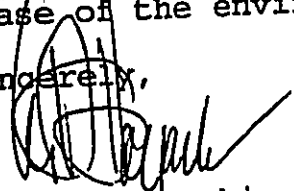
A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

DRAFT
Mr. Don Hibbard
May 31, 1995
Page 2

The final archaeological inventory survey report will be submitted to your office for review and approval upon its completion anticipated by mid-July 1995.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN CAYETANO
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097
March 22, 1995

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
SAM CALLEJO
GLENN M. OKIMOTO

IN REPLY REFER TO:
HWY-PS
2.4948

23 1995

TO: ALAN S. HAYASHI, EXECUTIVE DIRECTOR
CONVENTION CENTER AUTHORITY

FROM: KAZU HAYASHIDA *K.H.*
DIRECTOR OF TRANSPORTATION

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)
HAWAII CONVENTION CENTER, HONOLULU
TMK: 2-3-35: 01

Thank you for requesting our review of the Hawaii Convention Center Draft EIS. We have the following comments:

1. Convention center-bound vehicles turning right from westbound Ala Moana Boulevard onto Atkinson Drive will significantly worsen peak traffic congestion. Traffic impacts could be mitigated by adding a right-turn lane along the mauka side of Ala Moana Boulevard from the Ala Wai Canal Bridge to Atkinson Drive. A right-turn lane could be provided by relocating the median divider, reducing lane widths to 11 feet, and relocating the mauka sidewalk onto landscaping makai of Yacht Harbor Towers. The Final EIS should include a plan, estimate the cost, and evaluate the benefits and impacts of providing this right-turn lane.
2. The Draft EIS assumes that a new right-turn lane will not be provided along the mauka side of Ala Moana Boulevard. To mitigate traffic congestion, the Draft EIS proposes to "Restrict the existing curb lane of westbound Ala Moana Boulevard to a right-turn only movement at Atkinson Drive during a Friday evening post-commuter event hosted by a national/international convention." Please provide a discussion with appropriate tables in the Traffic Impact Analysis Report evaluating traffic operations during a post-commuter event if this proposal is not implemented. Who will be responsible for placing and removing cones and signs to implement this proposal?

Mr. Alan S. Hayashi
Page 2
March 22, 1995

HWY-PS 2.4948

3. During large conventions, bus queues will sometimes block the right mauka-bound lane of Atkinson Drive. Eight off-line berths in a well-designed bus station could handle shuttle bus traffic for a 14,000-person convention with minimal probability of bus queues. However, use of the convention center bus berths will be hampered by vehicular traffic on Atkinson Drive and Kapiolani Boulevard and by pedestrians crossing the lobby driveway. The report should mention traffic mitigation measures to minimize possible bus queues.

✓ c: Wilson Okamoto & Associates, Inc.

BENJAMIN CAYETANO
GOVERNOR



KAZU HAYASHIDA
DIRECTOR

DEPUTY DIRECTORS
SAM CALLEJO
GLENN M. OKIMOTO

RECEIVED
MAY 17 1995

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097
May 16, 1995

IN REPLY REFER TO:

HWY-PS
2.5154

WILSON OKAMOTO & ASSOC. INC.

TO: ALAN S. HAYASHI, EXECUTIVE DIRECTOR
CONVENTION CENTER AUTHORITY

FROM: KAZU HAYASHIDA
DIRECTOR OF TRANSPORTATION

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)
HAWAII CONVENTION CENTER, HONOLULU
TMK: 2-3-35: 01

We are submitting additional comments, on your Draft EIS, which relate to transportation demand management. These comments supplement earlier comments on traffic management contained in our memorandum dated March 22, 1995.

We request that the Convention Center Authority work closely with our Highways Division Demand Management Office, which will assist you in developing programs to minimize traffic generated by construction and operation of the convention center. There are a variety of well-tested incentives and disincentives which should be considered.

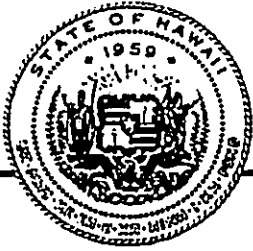
We suggest that the Authority assign a transportation manager with the responsibility to (a) minimize single-occupant vehicle trips, (b) manage parking facilities, and (c) coordinate shuttle bus operations. We further suggest that transportation demand management measures be initiated before construction begins.

To accommodate vans used for commuting, the convention center parking garage needs a minimum clearance of 6-feet 11-inches. We also suggest provision of secured on-site parking for bicycles at a rate of 5% of the total automobile stalls. Shower facilities and others amenities to encourage bicycling activities should also be considered.

Enclosure

c: Office of Environmental Quality Control
Attn: Gary L. Gill

✓Wilson Okamoto & Associates, Inc.
Attn: Earl K. Matsukawa



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Kazu Hayashida
Director of Transportation
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letters dated March 22, 1995 and May 16, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Letter dated March 22, 1995

1. The EIS traffic study indicates that with the large volume of vehicles turning right from Ewabound Ala Moana Boulevard onto Atkinson Drive, which would be increased with the convention center, it would be desirable to add a right-turn lane along the mauka side of Ala Moana Boulevard. In recent discussions between the State Convention Center Authority (CCA) and your department, the State Department of Transportation (DOT) has indicated that it will further evaluate the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. We also understand that the decision by the State DOT to implement this improvement is subject to the results of the City's Waikiki Regional Traffic Impact Plan which is anticipated for completion in August 1995.

We are encouraged by this project and offer the following information developed through the EIS traffic study.

The traffic study identifies two possible approaches to providing for the right-turn lane. In addition, your department suggests a right-turn lane could be provided by relocating the median divider, reducing lane widths to 11 feet, and relocating the mauka sidewalk onto

Mr. Kazu Hayashida
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landscaping makai of Yacht Harbor Towers. The following is a discussion and cost factors of each plan, and the benefits and impacts of providing this right-turn lane.

EIS Traffic Study - Approach A

To provide an exclusive 12-foot wide right-turn lane, Approach A would reduce the existing lanes of Ala Moana Boulevard between Atkinson Drive and the Ala Wai Canal Bridge to substandard widths, reduce the mauka sidewalk along Yacht Harbor Towers, and relocate the median divider.

Lane width reductions would narrow the Waikikibound left and center lanes of Ala Moana Boulevard (east of Atkinson Drive) from 12 feet to 11 feet. The Waikikibound curb lane would be reduced from 14 feet to 12 feet. In ewabound direction, the curb lane of Ala Moana Boulevard east of Atkinson Drive would be reduced from 14 feet to 11 feet. The remaining three ewabound lanes would each be reduced from 12 feet to 11 feet. With these lane width reductions, the median divider would be relocated 4 feet makai of its existing location. Also, the mauka sidewalk along Ala Moana Boulevard would need to be reduced from 10 to 8 feet in width.

The major cost that this plan would incur is to relocate the median divider, primarily due to the difference in grade elevation between the ewabound and Waikikibound lanes of Ala Moana Boulevard. The remaining costs would be associated with improvements such as lane re-striping and installation of a new curb along the mauka side of Ala Moana Boulevard.

EIS Traffic Study - Approach B

This approach would involve acquiring a strip of land from Ala Moana Park, widening Ala Moana Boulevard on that side, and shifting the median divider to provide the additional exclusive ewabound right-turn lane.

The 12-foot wide strip of land to be acquired from Ala Moana Park would extend from Ala Moana Park Drive to the Ala Wai Canal Bridge. The median divider would then be relocated 12 feet makai. With the relocated median divider, the left-turn lane on ewabound Ala Moana

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Boulevard onto Ala Moana Park Drive would need to be re-stripped, and the existing left-turn lane would be modified to become a through lane. The existing shared through/right-turn curb lane on ewabound Ala Moana Boulevard would be modified to become an exclusive right-turn lane onto Atkinson Drive.

As in the case of Approach A, a major cost for this plan would be for the relocation of the median divider, primarily due to the difference in grade elevation between the ewabound and Waikikibound lanes of Ala Moana Boulevard. Other costs associated with this plan would include installing a curb lane along Waikikibound Ala Moana Boulevard, and re-stripping the remaining lanes.

State DOT Suggested Plan

As previously indicated, the State DOT plan suggests that a right-turn lane could be provided by relocating the median divider, reducing lane widths to 11 feet, and relocating the mauka sidewalk onto landscaping makai of Yacht Harbor Towers.

The improvements associated with this plan would be similar to those of the aforementioned Approach A, except that all lanes of Ala Moana Boulevard between Atkinson Drive/Ala Moana Park Drive and the Ala Wai Canal Bridge would be reduced from 12 feet to 11 feet, and a strip of land along the mauka side of Ala Moana Boulevard would need to be acquired from the Yacht Harbor Towers parcel to retain the existing sidewalk width.

Benefits and Impacts of Providing the Right-Turn Lane

The primary benefit of providing the exclusive right-turn lane is to improve the overall capacity and level-of-service of the Ala Moana Boulevard/Atkinson Drive intersection.

Among the three plans discussed above, major long-term impacts associated with providing the right-turn lane would potentially include the following: the taking of public park land (Ala Moana Park as proposed in Approach B), acquisition of privately-owned land (Yacht Harbor Towers parcel as proposed in the State DOT proposal),

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July 17, 1995
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traffic safety implications resulting from reduced lane widths, and a reduction in sidewalk width.

Because development of an exclusive right-turn lane along Ala Moana Boulevard would involve public lands and funds, any construction proposal would be subject to the provisions of Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) and would be reviewed as a separate action from the convention center proposal. Also, since Ala Moana Boulevard is classified as a Federal Aid Primary route, such road improvements may be eligible for federal funding. If federal funding is involved, the project proposal would be subject to compliance with the appropriate Federal permits and regulations.

2. The EIS traffic study includes a discussion, with an appropriate table, of traffic operations at the intersection of Ala Moana Boulevard/Atkinson Drive during a 3,000-person Friday evening post-commuter event without designating the curb lane on westbound Ala Moana Boulevard to a right-turn only onto Atkinson Drive (pages 4-51 and 4-52). Without the recommended mitigation, the traffic operation at the intersection of Ala Moana Boulevard and Atkinson Drive is expected to operate at level-of-service (LOS) E during the Friday evening post-commuter peak hour. The critical traffic movements (i.e., eastbound left-turn and the westbound through/right-turn movements) would operate at LOS F without traffic mitigation.

During operation of the convention center, the operator of the Center will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. A basic transportation management plan, which includes temporary coning and signing operations, on-street parking restrictions, and responsibilities of traffic control personnel, will be prepared prior to the opening of the convention center by the Center's transportation coordinator and coordinated with the State Department of Transportation's (DOT) Highways Division Demand Management Office and the City Department of Transportation Services (DTS), as deemed appropriate. The transportation coordinator will be responsible for obtaining the appropriate permits from the State DOT and City DTS for the installation of

temporary traffic control signs and coning, and for the physical placement and removal of the signs and cones.

3. You express concern that during large conventions, bus queues will sometimes block the right maukabout lane of Atkinson Drive, and use of the convention center bus berths will be hampered by vehicular traffic on Atkinson Drive and Kapiolani Boulevard and by pedestrians crossing the lobby driveway. You further indicate that the traffic study should mention traffic mitigation measures to minimize potential bus queues.

First, we wish to reiterate that for a 14,000-person convention, the six bus berths provided at the main entry drive fronting the convention center lobby should be adequate to accommodate the projected number of shuttle bus trips (122) during the heavier AM peak hour under normal conditions. Also, the two additional on-street bus berths along the proposed widened portion of Atkinson Drive fronting the project site would be able to accommodate an additional 50 bus trips per peak hour. Furthermore, if necessary, up to 20 shuttle buses can be staged within the truck dock area located entirely within the convention center site to await passenger loading/unloading operations at the main entry drive.

The EIS traffic study indicates that the volume of vehicular traffic exiting the main entry drive is greatest during the AM peak hour (308 vehicles during a 14,000-person convention) when the volume of eastbound traffic on Kapiolani Boulevard is relatively low. With these conditions, queuing as a result of merging activities is not expected to occur. Also, maukabout traffic on Atkinson Drive is relatively light during the AM peak hour, therefore, merging actions of buses leaving the two bus berths are not expected to result in queuing and, subsequently, impact the flow of traffic.

During the PM peak hour, the volume of vehicular traffic exiting the main entry drive is anticipated to be less than half of that exiting during the AM peak hour (152 vehicles). Also, the planned widening of Kapiolani Boulevard fronting the project site will provide for three eastbound through lanes, resulting in more efficient lane utilization on Atkinson Drive and improved operation of the Kapiolani Boulevard/Atkinson Drive

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intersection. Furthermore, the EIS traffic study's analysis of shuttle buses exiting the lobby entry drive area during the PM peak hour reflects the additional delay resulting from the potential merging/queuing actions of traffic on eastbound Kapiolani Boulevard.

Regarding your concern that use of the bus berths will be hampered by pedestrians crossing the lobby driveway, please be apprised that traffic control personnel would be stationed at the main entry drive area to direct vehicular and pedestrian traffic.

Letter dated May 16, 1995

Prior to construction, the project's design/builder, Nordic/PCL, will coordinate with your department's Highways Division Demand Management Office in developing programs to minimize traffic generated by construction of the convention center.

As indicated in our response to your March 22, 1995 letter, during operation of the convention center, the operator of the Center will have a transportation coordinator on its staff to assist in managing the on-site parking facility, coordinate the shuttle bus operations, and promote ride-sharing activities. The transportation coordinator will also assist event organizers develop and implement an appropriate transportation management plan for their events. A basic coning and signing operations, on-street parking restrictions, and responsibilities of traffic control personnel, will be prepared prior to the opening of the convention center by the Center's transportation coordinator and coordinated with the State DOT Highways Division Demand Management Office and the City DTS, as deemed appropriate. The basic transportation management plan would include a list of alternative operational measures that could be implemented for various events. Prior to each event, specific alternatives to be implemented will be selected by the Center's transportation coordinator in coordination with the convention planner. We concur that a variety of well-tested incentives and disincentives be considered with respect to traffic management.

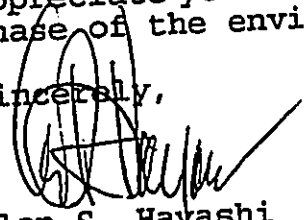
The convention center parking garage will have a minimal clearance of 6 feet 11 inches to accommodate vans and other

Mr. Kazu Hayashida
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Page 7

similar vehicles. Also, the Request for Proposals (RFP) for development of the convention center did not require the provision of bicycle parking or shower facilities within the Center. Furthermore, the ground floor level of the current convention center design is unable to accommodate space for such bicycle parking amenities. However, it is possible that the convention center operator may be able to accommodate bicycle parking in some locations on the parking level, although probably not the full 40 stalls requested. (Conventioneers are not expected to bicycle to the events, so these would be mainly for the convenience of employees.) We agree that this option is a viable form of transportation.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

BENJAMIN J. CAYETANO
GOVERNOR



GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
220 SOUTH KING STREET
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HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4186
FACSIMILE (808) 586-2452

March 24, 1995

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC., INC.

Mr. Alan Hayashi
Convention Center Authority
841 Bishop Street, Suite 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

Subject: Draft EIS for the Hawaii Convention Center

The State of Hawaii Convention Center Authority has selected Nordic/PCL to complete the design and construction of a convention center facility on a 9.65-acre site located on the former Aloha Motors property, at 1777 Kapiolani Boulevard, Honolulu, adjacent to the intersection of Kapiolani Boulevard and Kalakaua Avenue. It is also bounded by Atkinson Drive to the northwest, Kahakai Drive to the west, and the Ala Wai Canal to the south.

The convention center is to be a four level, stand-alone facility, without additional private development on-site. The facility's gross building area will be approximately 1,106,670 square feet, including 200,000 gross square feet of exhibit space on a single level, meeting room space of 100,000 square feet, and multi-purpose ballroom area of 35,000 square feet. Approximately 800 parking spaces will be provided on-site.

We have reviewed the Draft EIS for the Hawaii Convention Center and have the following comments:

1. The Hawaii Convention Center is expected to reach stabilization in the year 2008. Traffic volumes in the vicinity of the project are growing at a rate of 1.5 percent per year without the project. Therefore, we suggest that a traffic impact analysis be conducted for the year 2008.

Tables 5-1 to 5-5, show traffic capacity analyses for the project. Does "With Mitigation" include roadway improvement only or both roadway and operational improvements.

Mr. Alan Hayashi
March 24, 1995
Page 2

2. This project will extend 26 feet into the Ala Wai Promenade--a state historic site. How does the 26 feet intrusion impact the historic characteristics of the Ala Wai Promenade?
3. There will be about 1.2 tons of fugitive dust emissions per acre per month from the construction activity. How will this dust impact nearby residents? Watering twice daily will reduce the dust by only 50 percent. What other mitigation measures will be performed?
4. The total time for construction is approximately 2.3 years. The construction activity is expected to increase the noise level at adjoining properties to unacceptable levels. Also, typical noise levels of untreated mechanical equipment are commonly higher than the allowable Department of Health noise limits. Please list the specific measures that will be executed to mitigate noise impacts and state whether the mitigation measures will bring the noise level to an acceptable standard.

The Draft EIS also states that management of the bus traffic during events is recommended to minimize noise impacts. How will the "bus management program" be implemented and enforced?

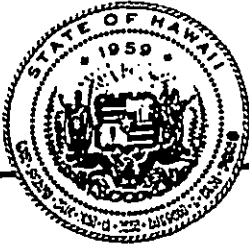
5. A convention center creates opportunities for redevelopment (e.g., change in use from residential to commercial). Please list the specific measures that will be performed to mitigate the impacts of displacement of residents and businesses, change in demographics, and increase in rents and property values?
6. A previous private proposal to develop a municipal convention center at this site would have created a special fund for community purposes. Will the authority provide any such community benefit program?

If you have any questions, please call Jeyan Thirugnanam at 586-4185. Thank you for the opportunity to comment.

Sincerely,


Gary Gill
Director

c: Earl Matsukawa, Wilson Okamoto and Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Gary Gill
Director
Office of Environmental Quality Control
State of Hawaii
220 South King Street, Fourth Floor
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The consideration of "phases of action" is different from the achievement of stabilized operations at the convention center. The concept of phased action would be applicable if a project were to be developed in phases, with each phase of development generating additional impact. In contrast, the proposed convention center will be fully developed and capable of accommodating a full-capacity event at its opening. Stabilized operation means that the frequency of events will reach stabilization, assuming that marketing, over time, will attract more convention events. The size of the full-capacity event will not change unless the center is physically expanded in the future.

Based on comments received on the Draft EIS, a projection of traffic conditions in the year 2005 (when the convention center is assumed to reach its full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan. In addition to the

Mr. Gary Gill
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intersections analyzed in the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR), the 2005 study also includes an analysis of additional intersections in the project vicinity. These additional intersections are those assessed in 1998 conditions to demonstrate that the significantly affected intersections have been considered in the EIS TIAR (the additional intersections analyses will be included in the Final EIS document). Although the analysis of traffic conditions in the year 2005 reflects the convention center-related impacts, its primary intent is to demonstrate the conditions that result from the continued growth in traffic not directly associated with the convention center. Its implication will be that the City and State need to work cooperatively to prevent the deterioration of traffic conditions to the degree that it adversely affects the community as well as convention center operations.

With respect to assessing traffic, the size of the largest events is the key issue. In response to comments received on the Environmental Assessment for the convention center, the Draft EIS TIAR conservatively assesses the impacts of the full-capacity 14,000 person event which is projected to occur about once in three years at stabilization. Inasmuch as this is such a rare event, traffic studies would not normally include such an analysis. The frequency of the events, however, does not affect the traffic analysis. In the traffic assessment, the impact of the largest event would be no different on a given day, whether it occurred rarely or frequently.

The 1998 analysis year was selected because this is when the convention center is scheduled to open and it is conservatively assumed that the full-capacity event would occur in that year. The opening year is important since this is the time when the traffic impacts of the convention center and the proposed mitigation measures are clearly defined.

Selecting an earlier analysis year would not account for the cumulative impacts of other on-going developments that would create the projected traffic condition in 1998. Thus, the 1998 analysis year includes a projected

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traffic growth rate of 1.5 percent per year, from the present, at the intersections analyzed. The traffic generated by the convention center is then added to assess the cumulative traffic impact. Consequently, the impact of the convention center is clearly defined. The effectiveness of mitigation measures in addressing convention center-related traffic can also be assessed.

Although 2005 traffic conditions have been analyzed, selecting a later analysis year (after 1998) would typically not be appropriate for assessing the impact of the convention center since the traffic associated with the convention center should at that point be considered part of the existing traffic condition in that year, including the permanent mitigation measures such as road widening and traffic signalization. Thus, any increase in traffic between the opening year and a later analysis year cannot be attributed to the convention center. In those intervening years, there would be more events at the convention center. However, the amount of convention center traffic would not increase relative to those estimated for 1998. Other developments and general traffic growth would contribute to traffic increases in the area. These increases, which are not directly the result of the convention center, would also be more appropriately addressed through the Waikiki Regional Traffic Impact Plan being prepared by the City. We recognize, however, that the convention center has a vital interest in assuring that roadways and intersections serving it remain functional as long as it is in operation. Thus, the CCA is committed to working with the City in the long-term to achieve this end:

While growth of traffic beyond 1998 will not be a direct impact of the convention center, it could be reasoned that some of that future growth in traffic could be a cumulative impact of induced secondary growth by the convention center. As discussed in the social impact assessment, due to many uncertainties regarding the timing and character of development in the area, such induced development cannot be predicted, much less the traffic impacts associated with such development. To account for this, the 2005 traffic analysis includes the 0.7 percent per year traffic growth factor, plus considers a number of proposed or planned projects within the area (those of which specific development have been

Mr. Gary Gill
July 17, 1995
Page 4

determined) which may be developed within that time frame.

There is no reference in the EIS TIAR to Tables 5-1 to 5-5 as indicated in your comment. We presume that the intent of your comment is in reference to Tables 4-4, 4-8, 4-10, 4-12, and 4-14 of the TIAR. Please be apprised that the "With Mitigation" in the above-referenced tables include both roadway and operational improvements.

2. Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

We recognize that the SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

3. The 1.2 tons of fugitive dust per acre per month is an estimate based on generic factors pertaining to soil characteristics and local precipitation. In this

instance, the soil itself has a lower potential for dust, but the relatively dry climate in the area yields a greater dust potential. The actual quantity of fugitive dust emissions will depend on these factors, plus the effectiveness of dust control by on-site contractors. Several dust control measures will be implemented by the design/builder. These include placing a gravel working surface over the entire site; frequently watering exposed dry soil areas, particularly heavily travelled areas within the site; covering trucks hauling materials that could generate significant amounts of dust in transit to or from the site; installing landscaping as soon as possible on completed open areas; and, if necessary to comply with DOH rules, erecting dust screens to protect nearby low-level properties.

4. As indicated in the noise study, noise impacts during the construction period are unavoidable, but temporary. Likewise, it is indicated that noise levels, especially from pile driving activities, may be degraded to unacceptable levels during construction. Construction operations will adhere to the State Department of Health (DOH) noise standards (Administrative Rules, Title 11, Chapter 43, "Community Noise Control for Oahu.") which imposes construction curfew times. For example, the construction curfew restricts pile driving activities (i.e., greater than 95 decibels) to the period between 9:00 AM and 5:30 PM, except Saturdays, Sundays, and specified holidays. Within the project site, pre-drilling through the upper coral layer will be provided for piles to be set in the lower coral layer. This will reduce noise by reducing the number of blows which would otherwise be required to penetrate the upper coral layer. Construction barriers up to 16 feet high will also be erected along the Kahakai Drive project frontage to further reduce construction noise.

Noise generated by stationary mechanical equipment will be attenuated, as necessary, to comply with the provisions of the State DOH noise standards. It should be noted that such stationary equipment relative to convention center operations must comply with the State DOH noise standards or violations could result in fines. The project designers are determining what sound treatments for the on-site mechanical equipment are needed to comply with the DOH noise standards.

As indicated in the noise study, because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

5. The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas identified susceptible to redevelopment in the vicinity. It clearly states, however, that this impact on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change of to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to the neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site

located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

6. The prior proposal was a privately developed convention center complex with smaller convention center, a 500-foot high hotel tower, two 500-foot high condominium towers, an office building, and retail uses. By comparison, the proposed convention center is a State-developed "stand alone" facility with no associated development. In terms of effects on the surrounding community, the current proposal has far less impact. Moreover, because the earlier development was a private for-profit development, there was a sense that the developer should compensate the impacted community. As a State project, the current convention center proposal will not necessarily be profitable in its operations, but will generate substantial tax revenues for the State through the hotel room tax, income taxes from jobs created and sales tax. Thus, the CCA is not in the position to offer any community programs. Such a program would need to be created by the Legislature through an appropriation from the State General Fund.

Mr. Gary Gill
July 17, 1995
Page 8

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813-5249
PHONE (808) 594-1888
FAX (808) 594-1885

RECEIVED
FEB 1 1995

February 22, 1995

Convention Center Authority
The State Of Hawai'i
841 Bishop Street, Room 2222
Honolulu, Hawai'i 96813
Attention: Alan S. Hayashi

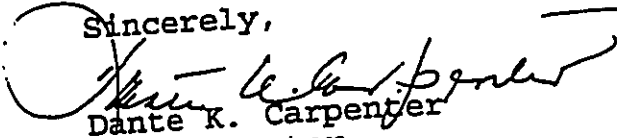
Re: Hawaii Convention Center, Honolulu, Hawai'i, Draft
Environmental Impact Statement.

Dear Mr. Hayashi:

Thank you for the opportunity to review the above referenced Draft Environmental Impact Statement (DEIS). At this time, we have no comments or concerns with this document.

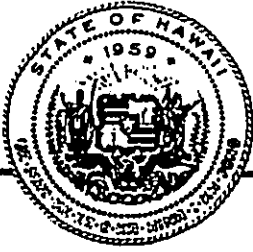
If you have any questions please contact Linda Delaney, Land and Natural Resources Officer or Lynn Lee, EIS Planner at 594-1888.

Sincerely,


Dante K. Carpenter
Administrator

cc: Clayton H.W. Hee, Chairperson
Board of Trustees

Office of Environmental Quality Control
Wilson Okamoto & Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Dante K. Carpenter
Administrator
Office of Hawaiian Affairs
State of Hawaii
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 96813

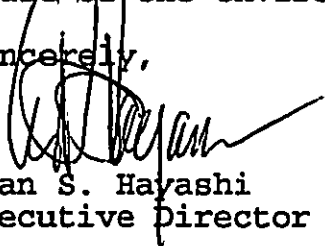
Dear Mr. Carpenter:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 22, 1995 indicating that you have no comments on the subject Draft EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



OFFICE OF STATE PLANNING

Office of the Governor

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STREET ADDRESS: 350 SOUTH HOTEL STREET, 4TH FLOOR
TELEPHONE: (808)587-2946, 587-2800

Benjamin J. Cayetano, Governor
FAX: Director's Office 587-2948
Planning Division 587-2934

Ref. No. C-1112

March 28, 1995

MEMORANDUM

TO: Mr. Alan S. Hayashi, Executive Director
Convention Center Authority

FROM: Gregory G.Y. Pai, Ph.D., Director *[Signature]*

SUBJECT: Hawaii Convention Center Draft Environmental Assessment
(Honolulu, Hawaii)

We have reviewed the draft environmental assessment for the Hawaii Convention Center and do not have any substantive comments at this time.

A technical comment is that the definition of the Coastal Zone Management (CZM) area on page 6-1 is incorrect. The CZM area includes all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the United States territorial sea.

Convention Center Authority
10000000

Number 766 Date 4/3/95

Name [Signature]

ASH _____

SB _____

JYS _____

EU _____

LY _____

PI _____

Other [Signature]

File under: DEIS COMMENTS - C

Other Issues: STATE (OSP)



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Gregory G.Y. Pai, Ph.D.
Director
Office of State Planning
State of Hawaii
P.O. Box 3640
Honolulu, Hawaii 96811

Dear Dr. Pai:

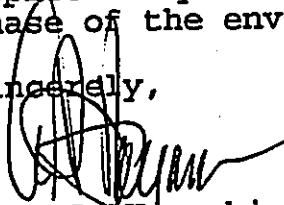
Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 28, 1995 indicating that you have no substantive comments on the subject Draft EIS.

Your correction of the Coastal Zone Management area definition on page 6-1 of the Draft EIS will be reflected in the Final EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



University of Hawai'i at Mānoa

Environmental Center
A Unit of Water Resources Research Center
Crawford 317 • 2550 Campus Road • Honolulu, Hawai'i 96822
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March 24, 1995
RE: 0659

Governor Benjamin Cayetano, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Suite 400
Honolulu, Hawaii 96813

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC. INC.

Dear Governor Cayetano:

Draft Environmental Impact Statement (EIS)
Hawaii Convention Center
Honolulu, Oahu

The State of Hawaii Convention Center Authority (HCCA) proposes construction of a convention center on a 9.65-acre site located on the former Aloha Motors property, at 1777 Kapiolani Boulevard, Honolulu. The convention center is to be a four level structure with a building area of 1,106,670 square feet, including 200,000 square feet of exhibit space, 100,000 square feet of meeting room space, and 35,000 square feet of ballroom area. Future expansion spaces for an additional 100,000 square feet of exhibit hall and 50,00 square feet for meeting rooms will be incorporated in the design. Approximately 800 parking spaces will be provided. Landscaping, design themes and artwork will serve to create a "Hawaiian Sense of Place."

We have reviewed this Draft Environmental Impact Statement (EIS) with the assistance of Chuck Gee, Travel Industry Management; Panos D. Prevedouros, Civil Engineering; George Taoka, Civil Engineering; Jon Matsuoka, Social Work; Kem Lowry, Urban and Regional Planning; and Paul Berkowitz and Malia Akutagawa of the Environmental Center.

The planners and designers should be commended for their efforts to accommodate many of the written concerns regarding the physical structure of the Hawaii Convention Center (HCC). However, a number of impacts directly resulting from the HCC have not been adequately addressed.

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Land Development

Over the past 20 years, the maximum number of allowed visitor units in Waikiki has been exceeded continually, from an established level of 26,000 units in the mid-1970s to an "optimum" level of 30,000 units in 1981, which again was exceeded and now stands at 32,800 units (a number which includes all of Waikiki, not just resort-designated areas). Under the Waikiki Special District Plan, Special Provisions adopted by the City Council state that: "Any additional high-density development should be discouraged." This view was endorsed by the Waikiki Master Plan produced in 1992. However, Appendix G to the HCC Draft EIS suggests that the existing hotel room supply would eventually need to be expanded "to achieve the desired level of utilization of the convention center facilities" (p.41). The study contends that the HCC would create a demand for 7,700 new visitor units in addition to the existing 28,600, creating a total of 36,300 visitor units. (Note: the discrepancy between 28,600 and 32,800 lies in the latter's inclusion of what constitutes the total inventory of visitor units.) The Draft EIS should address impacts that will result from this hotel expansion since it is likely that the subsequent development and associated traffic would intensify the Waikiki area's already well-recognized congestion-related problems.

In addition to Waikiki, the McCully/Mo'ili'ili and Ala Moana/Kaka'ako districts also potentially will be affected. According to the Social Impact Assessment (SIA), "a stand alone convention center ... creates opportunities for redevelopment and financial gain," (p.54) and there is the likely potential that "nearby parcels which are susceptible to change [may be] redeveloped" (p.55). The fact that higher-density development in these areas can be accommodated within the PUC Public Facilities Map of the study area portends likely growth and added congestion. The SIA makes the claim that "the proposed convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built" (p.54). This claim, however, does not address the problem, nor does it suggest any mitigation measures. Furthermore, construction of a convention center (and subsequent satellite development projects) will alter neighborhood characteristics to a greater degree than if other less-intrusive forms of development were to occur.

The SIA acknowledges that "if land use policies and laws are modified to allow new uses, such as resort facilities, then the

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overall characteristic [of the surrounding areas] will be altered" (p.57). Of particular concern in this case is the renter market. The Draft EIS reports that 57% of the houses in the study area are rentals, a figure that reflects a substantially higher 'rental' market and lower 'owner' market than the Oahu average. Furthermore, the study confirms that the average household size is smaller in the study area by suggesting a significantly high proportion of single person households. These neighborhood characteristics have several implications with respect to the HCC:

- (1) On-street parking demand by residents could lead to potential traffic and off-site street parking congestion; conflicts in neighborhood areas between residents, HCC employees and conventioners during HCC events, particularly those conventions that would draw local participants, are likely to be common.
- (2) Neighborhood rental costs will likely increase to cover rises in property taxes (in association with higher property values). This might inhibit the ability for entry-level employees of the HCC to live in close proximity to the HCC, forcing them to commute which, in turn, would add to the area's traffic and parking problems.
- (3) In the event of redevelopment, potential and existing lower-income renters (many of whom are University students or employees in Waikiki) will be forced to reside elsewhere. This phenomenon has long been occurring in Waikiki, a situation which the Waikiki Master plan has attempted to curtail. The construction of the HCC may be likened to opening the cork to Waikiki's bottle from which development, social problems and traffic congestion could "spill out" into neighboring areas.

Traffic Impacts

Data Sources

The Wilson Okamoto & Associates (WO&A) study used all the inputs and assumptions from the Wilbur Smith Associates (WSA) study. Data were neither verified or inspected, despite the fact that the WSA study was a "preliminary assessment". This is a major

The Honorable Benjamin Cayetano
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weakness. Most assumptions in both studies appear unsupported (i.e., there is no reference to support modal shares, forecasts, etc.).

The traffic volumes used are low and yield unrealistic results. The consultant appears to have used detector-measured volumes which are appropriate for low- to mid-load conditions but are very inaccurate for heavily loaded conditions (oversaturation) under which long queues form which cannot be captured by the detectors. More generally, the chain of data acquisition is bothersome: WO&A used data from WSA (claiming adjustment, although the data are identical to those in the WSA study), who, in turn, used data from Kaku and Cambridge Systematics. Worse yet, most data are from 1992 (a year in which a severe drop in tourism was observed) with unclear 1994 "updates". Present traffic plans seem to be disjointed: the Waikiki Master Plan proposes one-way "couplets" in Waikiki; the State has jurisdiction over Kalakaua Avenue; and the City has responsibility for all other major affected roadways.

Analysis Methods

The analysis methods used in traffic assessment appear flawed. Trip generation relating to the Center and the congested conditions of most of the surrounding street network are too complex to analyze with the simplistic methods in the Highway Capacity Manual (HCM). Single-intersection analysis is inadequate.

A more effective approach would incorporate a network analysis using simulation/optimization software. The method selected (HCM) does not permit the estimation of queue lengths and spill-backs which already occur all around the site. TRANSYT-7F and a network structure should have been employed to assess these impacts. The lack of such analysis is surprising, given that use of TRANSYT-7F is probably simpler than the repetitious application of single-intersection HCM analyses.

A proper network analysis should include the intersections of Ala Moana/Atkinson, Atkinson/Kapiolani, Kapiolani/Kalakaua, Kapiolani/McCully, McCully/Ala Wai, Kalakaua/Ala Wai and McCully/Kalakaua (then back to Ala Moana/Atkinson with intersections at Kalia and Hobron). This forms a perfectly closed network of 10 intersections, all of which will be affected by the Convention Center and the circulation in Waikiki.

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In reference to Figures 2-1 and 2-2, several results of the PM analysis are unrealistic:

- Atkinson, right turning-traffic at Kapiolani shows a Level-of-Service (LOS) of C. However, since traffic there backs up well beyond Kahakai, LOS C is incorrect. The volume of 1,016 vehicles on Figure 2-2 probably comes from detector counts (State DOT data). This count reflects the vehicles crossing the stop-line and not the true demand volume which is the large queue that forms behind the stop line. Thus, the analysis is based on faulty input parameters, as is proven conclusively by the study's data themselves: the midday volume for this movement is 751 vehicles (Figure 2-3) and the peak volume is 1,016 (only 35% more traffic, whereas the increase from midday to peak hour for Kapiolani Koko Head-bound is 113%!).
- Kapiolani through-traffic, Koko Head-bound at Kalakaua shows a LOS of B. Again, observations fail to support this designation. All through traffic on Kapiolani departing from the Atkinson intersections arrives at red (which is a very poor way of running the signals). The delay for this movement should be at least 40 seconds per vehicle, which results in a LOS of D. The analysis has probably failed to include the proper progression factor.
- Kapiolani through-traffic, Koko Head-bound at Atkinson, shows a LOS of C. Most vehicles wait two cycles to clear this intersection. The outcome of LOS C is unrealistic due probably to inappropriate data (the volumes do not reflect demand; rather stop-line crossings, which at saturated conditions are nearly equal to capacity). This also explains why the estimated $X=V/c$ for various congested movements in the study are 1.03 or less.
- Ala Moana through-traffic, Ewa-bound at Atkinson, shows a LOS of D. Most often the queue backs up all the way to (and beyond) the bridge over the Ala Wai canal. Most vehicles wait at least two cycles to clear the intersection.

Some of the above impacts are summarized in a few lines on page 2-13. The statements are weak, and are basically a watered down version of the concerns described on page 2-6 of the WSA

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study. For example:

- Atkinson traffic backing up beyond Kahakai: WSA says that it happens "usually", WO&A says "in brief periods".
- Traffic backing up on Kapiolani through-traffic Koko Head-bound at Atkinson: WSA includes a statement which essentially means back-up happens "always", whereas WO&A insists that this happens "in brief periods".

WSA on page 2-6 and elsewhere identifies major weaknesses in the operation of signals. We concur that signalization in Honolulu often causes rather than relieves traffic congestion.

Entrance to the 800-Stall Parking Facility

A detailed analysis on queuing and spill-overs is missing even though the spiral ramps and the attendant operation are likely to hold up traffic. Our estimates show that this operation could be problematic.

We assume (conservatively) that the time required from the bottom of the spiral ramp to clearing the attendant is 20 seconds. If one ramp is used for entering, the maximum number of vehicles that can be processed in hour is 180. The following vehicles should be added to this number: 11 cars which can be waiting in the 225 ft. length on the parking floor (distance from the end of the spiral ramp to the attendant), about 4 vehicles on the ramp and approximately 15 on the length of Kahakai from Atkinson to the ramp. Thus, the total for processing and temporary "storage" prior to spilling over on to Atkinson is 210 vehicles in one hour. This number can reach to 400 if both ramps are used for entering.

On the other hand, consider the demand for parking (auto trips only) as described in the WO&A study:

<u>CASE</u>	<u>PARKING DEMAND</u>
10,000 persons event, p. 4-18:	259 stalls
14,000 persons event, p. 4-34:	521 stalls
Friday, 3,000 persons event, p. 4-48:	666 stalls
Friday, all local event, p. 4-54:	784 stalls

It can be seen that for all scenarios parking processing

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(estimated earlier at 200 to 400 vehicles per hour) cannot keep up with the demand. To make matters worse, in our analysis we assumed one hour for processing all the visitors who drive and wish to park at the Convention Center, whereas it is more likely that the time window in which most arrivals will occur is 20-30 minutes prior to the event. These quick estimations show that anywhere from 100 to 400 cars (depending on the event) will be stuck on both sides of Atkinson waiting to turn to Kahakai in order to park. The result of this will be considerable impedance to through flows on Atkinson, Kapiolani and Kalakaua, as well as great patron dissatisfaction (many will experience long delays, and others will abandon the queues in search for a different place to park).

Public Transportation

The Draft EIS assumes that 30% of HCC employees will be using public transportation. This figure was derived from a study of bus users working in downtown Honolulu's Financial District. However, the degree to which employees of the downtown district are analogous to those working at the Convention Center is questionable. A more appropriate comparison for the Convention Center demographically as well as occupationally might be to ascertain the percentage of hotel employees in Waikiki who commute by bus. In addition, a thorough analysis of peak-hour bus ridership (which should include present and potential ridership growth to and from Ala Moana Center, Waikiki, and UH Manoa) should also be made before such "excellent" transportation alternatives are recommended.

The assumption that chartered buses will be full seems unrealistic despite the reference to S.E.A.T. planners (p 4-65) and their "extensive experience." Our experience has been that buses are rarely full, especially those on the Waikiki-Airport routes. In the 10,000 attendees case with 45% using chartered buses, use of buses at 100% capacity generates 90 bus trips, whereas using a more realistic 70% capacity utilization yields 150 bus trips. In the 14,000 attendees case with 70% using chartered buses, use of buses at 100% capacity generates 200 bus trips, whereas using a more realistic 70% capacity utilization yields 330 bus trips. It is difficult to verify the study's numbers. Seventy percent of 14,000 is 9,800 people, yet on page 2-23 the number appearing is 5,958 people, which at 100% bus utilization generates 122 bus trips. In sum, the actual number of bus trips needed to serve potential bus users may be much larger than estimated, particularly if a mix of

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large (49 seats) and smaller (20-25 seats) buses are used. There is no analysis of the impact of so many additional buses (slow and large vehicles) on the circulation between Waikiki and the Convention Center.

Traffic Mitigation Measures

Proposed mitigation responses to potential traffic tie-ups have provided little margin of error in the event of minor mishaps (e.g., an accident or a late-arriving delivery truck). Such incidents are not uncommon, and would create a domino-effect of traffic tie-ups extending beyond the immediate environs. With regard to this effect, the Draft EIS merely states: "CCA [Convention Center Authority] does not have the mandate or the funding to solve these problems."

As part of the proposed roadway improvements (p. i-29), one of the options includes widening the Ala Wai Canal Bridge. While not impossible, the ramifications of this improvement are not fully discussed. This measure would require approval by the U.S. Army Corps of Engineers as well as multiple other funding and permit negotiations at various levels of government. According to one of our reviewers, this improvement would be very expensive, technically difficult, and require about 10 years to complete. What will be the effects on traffic congestion in the interim?

Furthermore, there are no traffic mitigation scenarios which address either the potential future expansion of an additional 100,000 square feet to the HCC or the planned area-wide traffic growth expected over the next decade. There has been no assessment of the potential for traffic generation of adjacent future developments, including four in the immediate neighborhood: (1) the Veterans of Foreign Wars lot, (2) the City impound lot, (3) the re-development across the Convention Center (mauka side of Kapiolani) which is in progress, and (4) the re-development across the Convention Center (Ewa side of Atkinson). The study should have explored anticipated effects by assuming mid-sized condominium or hotel development which will likely take place at some or all of these lots.

Noise Impacts

The noise impact study focused primarily on moving vehicular

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traffic along nearby roadways. However, the HCC's loading dock location next to the Ala Wai Canal presents a particular noise impact to the surrounding area. Although the loading dock area is planned to be enclosed, the truck stall areas where generators and engines are often left running as well as vehicular movement to and from will be amplified across the Ala Wai Canal. The resulting noise will likely affect adjacent areas, including the proposed Ala Wai Promenade and the apartment district of the Hobron Area as a whole, particularly at night. In addition, the proposed construction of a pedestrian bridge over the Ala Wai Canal from the convention center to the Hobron Area might bring significant increases in pedestrian traffic into this neighborhood, further adding noise and visitor intrusion into what is already a densely-developed residential area.

Socio-Economic Impacts

The Draft EIS offers quantitative estimates of positive socio-economic impacts of the project, but is quite vague with regard to potential negative impacts. Specifically, the Draft EIS estimates:

- Direct construction employment averaging 320 jobs per year during project construction. (p. 4-9)
- Induced and indirect employment averaging 503 jobs per years associated with construction (based on multiplier of 1.57 FTE for every construction job). (p.4-9)
- Convention Center operational employment of 350 employees. (p. 4-9)
- Demand for an estimated additional 7,700 daily hotel rooms at the time of the Convention Center's "stabilization" (year 2008). (p. 4-9)
- 4,600 FTE positions to staff these hotel rooms. (p. 4-9)
- 2,900 new in-migrant employees to complement the existing work force to help fill these staff positions. (p. 4-9)
- Total direct, indirect and induced employment of "about 8,900 FTE positions per year by the time HCC reaches stabilization (year 2008)."

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While it is obvious that the construction and operation of the Convention Center will generate direct and indirect employment, the assumptions underlying estimates are not always clear (even if one accepts the employment multipliers that are used in the analysis as valid). For example, the analysis in Appendix G asserts that the Convention Center will result in the need for 7,700 additional hotel rooms, but does not indicate how this estimate was made. Nor is it clear how the estimate of 2,900 new in-migrant employees and family members was calculated. The potential construction of 7,700 new hotel rooms in the Waikiki area and the importation of labor to work in these hotel rooms are both major impact-generating phenomena which, to date, have not been part of the convention center debate. Indeed much of the public debate has focused on the importance of the Convention Center as a facility that would counter the annual cyclic lows in visitor arrivals rather than as a stimulus to new hotel construction.

The projected positive economic and fiscal impacts are dramatic:

- The Convention Center is projected to contribute \$6.4 billion to the state's economy. (p. 4-10).
- "By 2003, personal income attributable to HCC is projected to reach \$95 million, and by stabilization, this number is expected to increase to about \$126 million." (p. 4-11)
- "(T)otal new state revenues attributable to HCC are projected to be about \$216 million by stabilization." (p. 4-11)
- "(T)otal state expenditures are projected to be about \$70 million at HCC's stabilization." (p. 4-12)

The Draft EIS attributes very positive economic and fiscal impacts of the project (although fiscal costs to the county are never projected to exceed county revenues). These estimates are based on particular economic assumptions and multipliers, some of which are set forth in Appendix G. One could use more conservative multipliers to calculate other estimates of economic and fiscal impacts. However, what is ultimately most striking about this section is the degree to which potential positive impacts are treated quantitatively (and at length), while only general, qualitative statements are made about potential negative impacts.

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Among the potential negative social impacts that are under-analyzed are traffic congestion costs associated with the facility and associated development in the area, displacement costs, changes in land values and property taxes, and changes in rental costs. These impacts could be estimated using assumptions and multipliers that are no more questionable than those used in the Draft EIS to estimate long-term employment, visitor expenditures or demand for additional hotel rooms.

One set of impacts is of particular concern. The Convention Center is likely to result in increased economic activity in the immediate area and increased property valuations for parcels in the immediate vicinity of the project. While the project itself may not "cause" redevelopment of these parcels in the immediate vicinity, increased economic activity at the Ewa end of Waikiki, increased property taxes and other factors all are likely to contribute to a dynamic in which a substantial amount of new hotel, office and retail construction is encouraged.

To the credit of the analysts who prepared the supporting socio-economic report for the project, "land areas which are likely or susceptible to change" are identified in Figure B in Appendix G of the Draft EIS. Specific projects which have received major regulatory approvals are listed in Table 7. Even if one accepted these parcels as the only ones subject to re-development in the near future, it should be possible to calculate a range of estimates for new residential units, new hotel units, loss of rental units in various price categories, other displacement costs and, in particular, a range of estimates (rather than a single estimate) of the neighborhood traffic impacts and related congestion costs.

We do not suggest that it is the responsibility of the Convention Center Authority to define precisely the interactive growth effects stimulated, in part, by the Convention Center. On the other hand, these potential impacts do need to be estimated and considered in the planning process. In particular, the traffic study needs to be revised to incorporate the cumulative impact assessment of all the projects likely to be constructed in response to the Convention Center.

Additionally, in terms of cumulative and secondary impacts, the social impact assessment does not really consider the broader issue of bringing more people to Oahu, as well as to the outer islands. The draft EIS considers a lot of issues on a community

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level, but does not go beyond that. One of the primary reasons to build the HCC is, of course, to enhance tourism. While the document briefly lists five critical issues concerned with promoting tourism (p. 4-6), it does not actually assess the potential social effects of increased tourism. Pursuant to Chapter 343 of the Hawaii Revised Statutes (HRS), an EIS must discuss "the effects of the proposed action on the economic and social welfare of the community and State." Clearly the HCC EIS fails to meet the requirements in this regard: listing some fundamental issues and assessing the impacts constitute two entirely different degrees of analysis.

Mitigation Measures

Most of the suggested solutions to these and other identified environmental impacts have been based on physical design. However, certain community-type issues (i.e., land use and traffic congestion problems) range beyond the site itself and often require more flexible solutions. In the absence of any further physical alterations that can be made as a means to alleviate these impacts, the Convention Center Authority should concentrate its efforts on development of temporal and spatial systematic management plans which can treat environmental impacts created by location of the HCC at this site. This is most critical in case of the Convention Center due to the level of urban development which already surrounds the proposed site. As part of the planning and construction of the Convention Center, mitigation measures might therefore include:

- An interim construction and later peak-hour commute traffic management plan under the various types of convention scenarios to be expected which (1) treats the bottleneck potential of traffic congestion and limits street parking in the area around the HCC holistically (i.e., including secondary and tertiary roadways); (2) describes the implementation and use of such features as coning, signage, sequenced signaling and bus service for the length of all possible roadway impacts due to convention traffic; and (3) identifies an external parking area location/mini-bus transport system for guests (as was alluded to in the Draft EIS).
- A convention management plan that will assure that the surrounding neighborhoods are protected from over-

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development, conventioner pedestrian and vehicular traffic, and excessive construction- and convention-related noise.

- Possible enactment of new ordinances - What are the existing regulations regarding truck deliveries to hotels located near beachfront areas in Waikiki? Could similar restrictions be applied to convention exhibits loading and transport to mitigate traffic and noise concerns?

Conclusion

Our reviewers have unanimously remarked on the advocacy tone of this draft EIS. It repeatedly emphasizes economic and social benefits and tends to downplay any negative impacts of the project. Section 11-200-14 of the Hawaii Administrative Rules (H.A.R.) states that an EIS shall not be merely a self-serving recitation of benefits and a rationalization of the proposed action.

One of our greatest concerns is that the document fails to adequately address mitigation measures and their costs. Road capacity at the project site is already close to, if not at, saturation. The addition of a world-class convention center in the area will necessitate intense traffic mitigation requiring major capital investment for infrastructure improvements. Given the access and egress needs of HCC users and employees, effective transportation management very likely will only be achievable through investment in a rapid transit system at costs comparable to or greater than the Convention Center itself.

Section 11-200-17(i), HAR, requires that a draft EIS must consider:

... (t)he interrelationships and cumulative environmental impacts of the proposed action and other related projects ... It should be realized that several actions, in particular those that involve the construction of public facilities or structures (e.g., highways, airports, sewer systems, water resource projects, etc.) may well stimulate or induce secondary effects. These secondary effects may be equally important as, or more important than, primary effects, and shall be thoroughly discussed to fully describe the probable impact of the proposed action on the environment. The population and growth impacts of an action shall be estimated

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March 24, 1995
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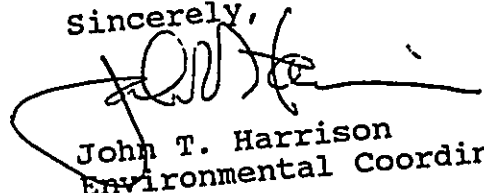
effects of any possible change in population patterns or growth upon the resource base, including land use, water, and public services, of the area in question ...

Clearly the draft EIS fails to meet this content requirement. Most notably in the areas of traffic assessment, effects on Waikiki land use, and social impact assessment, the document conspicuously fails to consider the cumulative and secondary effects.

Due to the magnitude and significance of these inadequacies, we recommend that this Draft EIS be withdrawn and resubmitted with a proper assessment of the secondary and cumulative impacts as mandated by Section 11-200-17(i), HAR. In the absence of these assessments, the public review process has been severely undermined, since the public has not had access to the full scope of the impacts. Simply incorporating addenda into the Final EIS will not address the issue of procedural denial of public review through the omission of legally required content at the draft stage.

Thank you for the opportunity to review this Draft EIS.

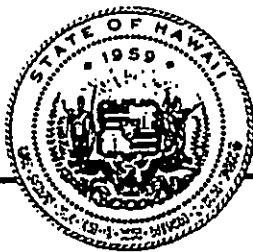
Sincerely,



John T. Harrison
Environmental Coordinator

The Honorable Benjamin Cayetano
Governor, State of Hawaii
March 24, 1995
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cc: OEQC
Roger Fujioka
Convention Center Authority
Wilson Okamoto and Associates, Inc.
Panos Prevedouros
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Convention Center Authority

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July 17, 1995

John T. Harrison, Ph.D.
Environmental Coordinator
University of Hawaii Environmental Center
State of Hawaii
Crawford 317
2550 Campus Road
Honolulu, Hawaii 96822

Dear Dr. Harrison:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Land Development

The Economic and Fiscal Impact study in the Draft EIS projected that the net new convention-related visitors to the islands will require 7,700 hotels rooms statewide per night by 2008. It does not project that 7,700 additional hotel rooms need to be constructed in order to accommodate this demand.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

In the revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 convention days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room

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occupancy rates at the existing 28,414 units on Oahu from 80 to 90 percent. Another 300 units would be added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it is anticipated that visitor demand (other than conventioners) could be expected to continue to shift to the Neighbor Islands which could be expected to absorb 60 percent of the demand. The remaining 720 units could be met by development on Oahu without rezoning at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas identified susceptible to redevelopment in the vicinity. It clearly states, however, that this impact on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-

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up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

Your comment that other forms of development on this site may be less intrusive is correct to the extent that development less than allowed by current zoning could occur. On the other hand, under current zoning, the ten-acre site can be developed with a mixed-use complex of retail, office and residential structures to a height limit of 350 feet. If such a development were to approach allowable densities, the associated traffic would be comparable to that of the largest convention events of the current proposal and would occur on a daily basis, as opposed to sporadic convention events. While some mitigation measures would be required, such as the widening and dedication of one additional lane of roadway on Kapiolani Boulevard and Kalakaua Avenue, pursuant to Ordinance No. 91-25 (formerly Ord. No. 24-12), no EIS would be required. Without the benefit of an EIS, potential social impacts may neither be identified nor mitigated.

Regarding the specific points raised:

1. Parking within the convention center is designed to accommodate overseas convention events where most of the delegates would be transported to the site by buses. The Blaisdell Center will remain the primary venue for local events. On-going improvements to the Blaisdell Center were funded in the amount of \$13 million by the State specifically to better accommodate local trade-shows and other large local events. Moreover, it is not the intent of the convention center to take business away from hotels with ballroom facilities accommodating smaller conventions, and local events such as wedding receptions. Thus, local events at the convention center are anticipated to be infrequent. To the extent that the convention center parking garage cannot accommodate local parking, event organizers will be required to provide off-site parking. In spite of such measures, on-street parking is available to the general public and, inevitably, some people will choose to seek out such parking, creating additional competition for the limited number of spaces available. The SIA in the Final EIS will address this impact.

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2. To provide a conservative assessment, the traffic study assumes that all convention center employees will commute by automobile or bus.
3. The project's impacts on residential uses in the area are discussed on pages 48 through 65 of the SIA in the Draft EIS. As discussed previously, the SIA in the Final EIS has been revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. This includes an expanded discussion on redevelopment impacts. With respect to your comment that the Waikiki Master plan attempts to curtail the loss of low income rentals, we would point out that the plan actually recognizes that "displacement of lower-cost units with higher-cost condominium apartments is likely to continue in Waikiki, as it would in other districts of Honolulu where land values are high." Also, "clearly, development of affordable housing in Waikiki is unfeasible if land must be purchased." And, while "other alternatives to obtain affordable housing were examined, including the concept of a 'housing linkage program'... from a legal standpoint, it would be difficult to defend treating Waikiki developments differently from hotel and commercial developments elsewhere in the City." (p. 20)

Traffic Impacts

Data Sources

The traffic count data derived from the Hawaii Convention Center Transportation Impact Assessment prepared by Wilbur Smith Associates (WSA/TIA) for the morning and afternoon peak traffic periods was further validated for the Transportation Impact Analysis Report prepared for the environmental impact statement (EIS TIAR). Verification was accomplished by manual traffic count surveys taken in 1994 by The Traffic Management Consultant (traffic consultant to the EIS TIAR) and the most recent available data from the City and County of Honolulu Department of Transportation Services (DTS) and the State of Hawaii Department of Transportation (DOT). The travel forecast assumptions and modal shares used in both the WSA/TIA and EIS TIAR were developed pursuant to discussions with persons with extensive experience in convention center operations across the nation and those associated with major

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Waikiki hotels which host convention events. Specifically, information was obtained through discussions held with managers and others associated with the Los Angeles, San Diego, Miami, Portland, and Sacramento convention centers, and the Moscone Center in San Francisco. In addition, the information obtained was further supplemented and verified in consultation with the State Convention Center Authority's (CCA) technical evaluation board member on convention center operations and with the CCA's Marketing Director.

The traffic data used in the EIS TIAR was obtained primarily from manual traffic count surveys and verified by detector count data. In the WSA/TIA, traffic volumes were obtained from special counts made by Kaku Associates and Cambridge Systematics, Inc. in 1992 for the rapid transit project and the Waikiki Master Plan study. These counts were updated and supplemented by counts made by WSA in March 1994 for key intersections. As indicated above, the traffic volumes were further validated for the EIS TIAR analysis using the most recent available traffic data obtained from the State DOT and the City DTS. Furthermore, manual counts were conducted by The Traffic Management Consultant at specific intersections to verify critical turning volumes in the study area. Also, the traffic count data for the mid-day (weekday) peak and Friday evening post-commuter peak period analyses were obtained by manual traffic count surveys conducted for the EIS TIAR. We would also point out that traffic volumes used in the EIS TIAR are consistent with the traffic data collected by Kaku Associates in February 1995 for the City's Waikiki Regional Traffic Impact Plan which is currently underway.

Regarding your statement that the present traffic plans seem to be disjointed, we offer the following responses to your specific comments:

- The City's ongoing Waikiki Regional Traffic Impact Plan is intended to examine the regional traffic impacts and future roadway requirements of the area, including reevaluating the change in traffic circulation and patterns of the major streets in the area.
- The City, and not the State, has jurisdiction over Kalakaua Avenue.
- With the primary exception of Ala Moana Boulevard, which is under State jurisdiction, and Kona Street and Mahukona

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Street which are under private ownership, all other major affected roadways in the convention center study area are under the City's jurisdiction.

Analysis Methods

According to the *Manual of Transportation Engineering Studies*, Institute of Transportation Engineers, the Highway Capacity Manual (HCM) methodology used in the EIS TIAR is a generally accepted and widely used technique for traffic impact analysis. Regarding your comment that the single-intersection analysis is inadequate, the HCM methodology does provide for the effects of adjacent intersections on traffic signal progression. The measure of effectiveness in the TIAR for intersection operation is level-of-service, which is based on roadway system characteristics including lane geometry, peak hour factor, number of lanes, traffic volume, and traffic signal progression. The volume-to-capacity ratios are also provided to further illustrate the relationship of these two evaluation parameters for a specific roadway segment.

TRANSYT-7F does provide much of the same analysis output as the HCM methodology, plus some assessment of the traffic effects caused by the spacing and timing of other nearby signals. However, the TRANSYT-7F traffic analysis program was developed to assist in the evaluation and design of signal timing for a network of traffic signal-controlled intersections, and was not primarily intended for use in evaluating impacts of development projects.

We have sought to demonstrate the flows of traffic through the project area, both with and without the project, through use of the NETSIM traffic simulation model. The NETSIM model provides a visual representation of individual vehicles and platoons of vehicles moving through the adjacent network of streets and the queuing of vehicles at each intersection. The network simulation encompassed the intersections of Kapiolani Boulevard with Kalakaua Avenue and Atkinson Drive, the Atkinson Drive/Kahakai Drive intersection, and the convention center driveway intersections with the adjacent streets. The simulation of traffic flows on these street segments and the traffic queues at these intersections were presented at a public informational meeting on February 22, 1995. The following is in response to your comment indicating that a proper network analysis should include the intersections as

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identified in your comment. In response to comments received on the Draft EIS that additional intersections in the project vicinity should be analyzed for potential convention center traffic impacts, analyses have since been conducted for the following intersections: Kalakaua Avenue at McCully Street, Kalakaua Avenue at Ena Road, Kalakaua Avenue at Ala Moana Boulevard, Ala Moana Boulevard at Ena Road/Kalia Road, Ala Wai Boulevard at McCully Street, Kapiolani Boulevard at McCully Street, Atkinson Drive at Mahukona Street, Makaloa Street at Kalakaua Avenue, Hobron Lane at Ala Moana Boulevard, and Kapiolani Boulevard at Kaheka Street/Mahukona Street. The report on the 1998 conditions of these additional intersection analyses, which will be included in the Final EIS document, substantiates the selection of critical intersections initially analyzed, and indicates that the impacts on the other intersections are relatively insignificant.

Regarding your comments that several results of the PM analysis are unrealistic (in reference to Figures 2-1 and 2-2 of the TIAR), we offer the following responses in the respective order of your comments:

- **Atkinson, right-turn at Kapiolani.** The Level of Service (LOS) C is the result of the HCM analysis. The LOS C is not necessarily inconsistent with queues extending back to Kahakai Drive. As previously indicated, the traffic data was obtained from manual traffic count surveys and not State DOT detector counts. Over a 60-minute period (PM peak hour), the true demand reflected in the vehicle queue behind the stop line is accounted for in the manual count survey as the queue dissipates. The disproportionate increase in traffic on Koko Head-bound Kapiolani Boulevard likely results from its heavy use during the PM peak hour by commuter traffic. On the other hand, a larger proportion of traffic on Atkinson Drive is attributed to activities associated with Ala Moana Center (i.e., shopping, etc.) rather than commuter traffic. Therefore, the percentage increase between the mid-day and PM peak hour differ for Kapiolani Boulevard and Atkinson Drive.
- **Kapiolani through-traffic, Koko Head-bound at Kalakaua.** Our field investigation does not confirm your statement that "all through traffic on Kapiolani departing from the Atkinson intersection arrives at red" since the green phase at the intersections of Kapiolani Boulevard and

Atkinson Drive and Kapiolani Boulevard and Kalakaua Avenue begins almost simultaneously. The progression factor used in our analysis reflects our field observation.

- **Kapiolani through-traffic, Koko Head-bound at Atkinson.** The delay experienced by vehicles on Kapiolani Boulevard at Atkinson Drive is a result of traffic queuing from the Kapiolani Boulevard/Kalakaua Avenue intersection. As previously stated, over a 60-minute period (PM peak hour), the true demand reflected in the vehicle queue behind the stop line is accounted for in the manual count survey as the queue dissipates. Under observed traffic conditions, the volume-to-capacity ratio does not exceed 1.00 since capacity is defined as the maximum volume of traffic traversing a section of roadway.
- **Ala Moana through-traffic, ewa-bound at Atkinson.** During the period of our field investigation, we observed that the ewabound traffic on Ala Moana Boulevard does not back up beyond the Ala Wai Canal bridge. Our observation indicates that most vehicles clear the intersection in one signal cycle. There may be days, however, that traffic stacks back beyond the Ala Wai Canal bridge.

The summary of existing conditions on page 2-13 of the EIS TIAR is based upon our observations. In your example of Atkinson Drive traffic queuing beyond Kahakai Drive, we maintain that the two statements of what occurs "usually" and what occurs "in brief periods" are consistent. The term "usually" refers to the frequency that queuing occurs while "in brief periods" means that the duration of the queue is brief. Although we concur that traffic does queue back on Kapiolani Boulevard Koko Head-bound at Atkinson Drive, the WSA/TIA does not state that the back-up "always" happens.

Entrance to the 800-Stall Parking Facility

The design and operation of the convention center parking garage will minimize queuing and spillovers onto the public streets.

The capacity of the parking garage entrance would be controlled by the entry gate located at the top of the ramp. Two control gates are planned at the top of the circular entrance ramp on Kahakai Drive which would expedite entry into

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the parking garage. Although we concur that the time required for a vehicle to clear the circular ramp and gate control may be about 20 seconds, studies have shown that a control gate could process up to 400 vehicles per hour. As applied to the convention center parking garage, the processing of 400 vehicles per hour at each of the two control gates on Kahakai Drive would result in a total of 800 vehicles per hour. Furthermore, according to *The Dimensions of Parking Second Edition* by the Urban Land Institute (1983), the circular ramp should be able to handle up to 800 vehicles per hour. Therefore, the maximum number of vehicles that can be processed in one hour is 800 vehicles per hour rather than the 180 vehicles indicated in your comment. Furthermore, a secondary reversible ramp on Kalakaua Avenue provides an additional access point to the convention center parking garage. Similarly, the Kalakaua Avenue ramp will be rated at the 400 vehicles per hour based on the single-entry gate located at the top of the ramp. Therefore, the total ramp capacity using both the Kahakai Drive and Kalakaua Avenue ramps are 1,200 vehicles per hour.

We would like to emphasize that operational procedures could be implemented to expedite the entry of automobiles into the parking garage to minimize any queuing back onto the streets. One such option could involve issuing on-site parking passes to attendees on a pre-registration basis in order to expedite vehicles past the control gate (i.e., in lieu of vehicles having to stop to take a ticket). All other convention attendees would be notified prior to the event that no on-site parking would be provided without a pass.

Regarding your comment about the demand for parking, the parking demand is based upon the peak number of parking stalls occupied rather than the trips generated during the peak hour. For trips generated by the convention center, the peak arrival rate is expected to occur during the 1,800-person all-local event held on a Friday evening following the post-commuter traffic. In this scenario, 705 vehicles per hour are expected to arrive during the peak hour. The convention center's total ramp capacity of 1,200 vehicles per hour should more than accommodate the projected traffic demand.

With respect to arrival time, we feel it is unlikely that most attendees would arrive at the convention center within 20 to 30 minutes prior to the start of the event. First, convention

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organizers, exhibitors, speakers, and others associated with the convention or evening function activities are expected to arrive much earlier in order to have adequate time for set-up, etc. During a regular convention event, the arrival of attendees in automobiles would likely be dispersed over 30 minutes due to the nature of a convention (i.e., typically not structured as an "opening gavel" type of event). During an evening function, the arrival of attendees would likely be distributed over a period longer than 30 minutes since some attendees would opt to attend the typical cocktail hour which usually precedes the main function. Theoretically, even under the worst-case scenario with all 705 vehicles arriving in a short period of time, both entry ramps to the parking garage would be able to process up to 1,600 vehicles per hour if the gate controls were left open, thereby processing the projected demand in under 30 minutes.

Public Transportation

Of the approximately 36 full-time convention center employees assumed to travel to and from work by public transportation during the AM and PM peak traffic hours, most would likely share characteristics similar to the downtown Financial District (i.e., to be in the administrative capacity). Furthermore, these approximately 36 employees would likely be distributed among the major bus routes serving the area and, therefore, should not have a significant impact on the public transit system. Regarding your comment that a more appropriate comparison, both demographically and occupationally, might be to ascertain the percentage of hotel workers in Waikiki who commute by bus, we maintain that the large number of part-time or temporary food service or other workers needed for special events at the convention center may mostly commute by bus. However, as indicated in the EIS TIAR, these employees are expected to generally arrive and depart the convention center during the off-peak hours of traffic, and therefore, are not expected to impact peak-hour bus ridership.

According to convention transportation planner S.E.A.T. Planners, Incorporated, their experience with convention centers nationwide indicates that you can achieve an average passenger load per shuttle bus approximating the average capacity of those buses used for the event (i.e., there may be empty seats on some buses, but there will be standees on other buses). It should be noted that much pre-planning is entailed

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by the shuttle bus operator for a large convention to ensure timely and maximum efficiency in transporting conventioners between host hotels and the convention center. The capacity of buses transporting passengers between the airport and Waikiki hotels does not serve as an appropriate comparison since the controlling factor is actually the arrival/departure times of the respective airlines serving these passengers. In comparison, the set schedule of convention events at the convention center along with the predetermined number of registered attendees are the controlling factors which help to determine the number of shuttle buses required to transport conventioners.

As indicated in the EIS TIAR, the largest available bus vehicle capacity provides the most cost-effective service. Based upon the current private bus fleets, the large charter coaches can accommodate a capacity of 49 or more seated passengers. The large charter coaches range in size from 49 to 65 seats, with 54 seats being the most common size. Also, the costs incurred by shuttle bus operators are attributed to labor or bus drivers, rather than the size of vehicles. Therefore, it would be more cost-effective for the shuttle bus operator to obtain maximum passenger capacity in a large-size bus than to conduct an operation using smaller buses. There may be occasions, however, whereby some shuttle buses may operate at less than the capacity passenger seated loads. To transport the estimated number of convention attendees, other shuttle buses would accommodate standing passengers to compensate for the undercapacity buses.

We would like to provide clarification to your comment which indicates that it is difficult to verify the study's numbers. For a 14,000-person convention, the 70 percent of Oahu visitor attendees assumed to ride the shuttle bus (5,958 persons) is based on the number of attendees assumed to arrive during the AM peak hour on a peak convention day. On a typical high-usage day, 80 percent of the registered conventioners (11,200 persons) are assumed to attend events at the convention center. Eighty (80) percent of the daily attendees (8,960 persons) would arrive during the AM peak hour. Of this, local residents comprise 5 percent of the daily attendees (448 persons). The remaining 95 percent are Oahu visitor attendees (8,512 persons), of which 70 percent are assumed to ride shuttle buses (5,958 persons).

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Traffic Mitigation Measures

Roadways are not sized to provide capacity to accommodate unusual events, such as traffic accidents. When such incidents occur, depending on the time of day and traffic conditions, it may contribute to roadway congestion. This is presently an occurrence on streets throughout Honolulu. However, the mitigation measures for the project are based on accommodating the traffic associated with a 10,000-person convention at the Center. This event would occur on about 20 days a year. For the other days of the year, the street capacity would be used to a lesser degree than the conditions indicated in the TIAR, with this "unused" capacity on those days providing a reserve in the event of accidents or other unusual traffic mishaps.

The proposed roadway improvements (page i-29) to be constructed as part of the convention center project do not include the option of widening the Ala Wai Canal bridge at Kalakaua Avenue. The EIS TIAR demonstrates that convention center-generated traffic does not require the widening of the Kalakaua bridge.

Due to the uncertainty of the time frame for future expansion of the convention center, a supplemental EIS would need to be prepared when the decision is made to pursue such expansion. A traffic impact analysis would need to be conducted for the supplemental EIS. Such analysis could consider the findings of the Waikiki Regional Traffic Impact Plan being prepared by the City and any resulting traffic improvements that may have been implemented.

While the EIS TIAR acknowledges that the potential projects which could most directly affect traffic conditions near the convention center include development of the former Veterans of Foreign War site and the former Unocal service station site and City impound lot for towed vehicles, development of these parcels are not included in the 1998 study forecasts since the composition and timing of the projects are not known at this time (although the timing will most likely be after 1998). Further, we are unaware of any redevelopment currently in progress across the convention center on either the mauka side of Kapiolani Boulevard (except for the recent 2-story remodel) or the ewa side of Atkinson Drive as indicated in your letter.

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As the parcels most susceptible to redevelopment in the adjacent area are primarily located within the BMX-3 Community Business Mixed Use District zoning designation, future development could conceivably include condominiums, commercial office/retail uses, and commercial parking lots and garages, among other uses. Further, the City's Development Plan Special Provisions for the Primary Urban Center allow hotels as part of the commercial emphasis mixed-use development in the area bounded by Kapiolani Boulevard, Kalakaua Avenue, the Ala Wai Canal, the medium-density apartment designated area, Atkinson Drive, and Mahukona Street. Nevertheless, even if we were to assume likely project compositions, the uncertainty as to the composition and timing of such development would preclude a reasonable analysis of traffic impacts. To account for such potential redevelopment, an annual traffic growth rate of 1.5 percent per year through 1998 has been factored into the analysis in the TIAR.

Based on comments received on the Draft EIS, a projection of traffic conditions in the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan. In addition to the intersections analyzed in the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR), the 2005 study also includes an analysis of additional intersections in the project vicinity. These additional intersections are those assessed in 1998 conditions to demonstrate that the significantly affected intersections have been considered in the EIS TIAR (these additional intersections are described in our previous response under "Analysis Methods"). Although the analysis of traffic conditions in year 2005 reflects the convention center-related impacts, its primary intent is to demonstrate the conditions that result from the continued growth in traffic not directly associated with the convention center. Its implication will be that the City and State need to work cooperatively to prevent the deterioration of traffic conditions to the degree

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that it adversely affects the community as well as convention center operations.

Noise Impacts

The loading dock area of the convention center is designed to be enclosed along Ala Wai Promenade and Kalakaua Avenue. All truck loading and unloading activities will occur within the enclosed loading dock area which is designed to accommodate about 12 individual docks, with provisions for a turnaround area. The idling of truck engines and generators will occur within the enclosed loading dock. Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Also, truck noise will not be amplified across the Ala Wai Canal since the loading dock is enclosed on the Ala Wai Promenade side. Furthermore, as indicated in the noise study conducted for the Draft EIS, heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with existing State DOH vehicular noise limits and curfew periods. While your concerns with respect to potential noise and visitor intrusion in the Hobron area are acknowledged, current plans for the convention center do not include any improvements associated with constructing a pedestrian bridge over the Ala Wai Canal.

Socio-Economic Impacts

As mentioned previously, the economic and fiscal impact assessment has been revised in the Final EIS. Hence, some of the figures you quote in your letter have been superseded. One of the revisions made in the assessment was a clearer documentation of assumptions and their sources as well as the methodology used in constructing the model.

With respect to hotel room demand, the findings of the revised economic and fiscal impact assessment indicate that the convention center will have the effect of increasing occupancy rates and countering the annual cycles of low visitor arrivals rather than significantly stimulating new hotel construction.

A concern was expressed that the Economic and Fiscal Impact study quantified the convention center's positive impacts, but that the Social Impact Assessment only qualitatively assessed its potential negative impacts. In this regard, it should be emphasized that the economic and fiscal impact assessment relies on available quantified economic data and information from various sources on a Statewide, County or industry-wide basis. Hence, factors such as visitor spending rates, hotel occupancy rates, employment, in-migration, and tax revenues can be documented and utilized in the model. The results of the model are presented in terms of Statewide and County estimates.

On the other hand, the impacts of primary concern with respect to the Social Impact Assessment are on the neighborhood level. The impacts of the convention center on the immediate area at stabilization (approximately 2005) are identified in the Economic and Fiscal Assessment and the Social Impact Analysis in the appendix of the FEIS. Traditionally, the one major type of land use activity which benefits from close proximity to a convention center is hotel development. Several sites have been identified for potential hotel use near the center including (1) the area on the ewa side of Atkinson between Kona and Kapiolani, (2) the Waikiki Gateway area and (3) the conversion of the Waikiki Landmark into a hotel. The Economic/Fiscal Assessment identifies a potential demand for 360 to 720 additional hotel rooms in 2008 to support the convention center, or one to two additional standard size hotels. Although these could be developed on the sites identified above, current City policy does not permit hotels on any of them. However, as noted in the Economical and Fiscal Assessment, current zoning does permit hotels on two other sites which could serve the center. One of these is the Kalia Tower on the Hilton Hawaiian Village grounds and the other is within the Aloha Tower complex in the Downtown area. There is considerable public sentiment to continue the cap on hotel development in the Waikiki area, and since the demand for convention center hotel rooms can be met under current City policy, justification for new hotels on the sites around the center is lacking.

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Other than hotels, there are no other major land uses which benefit significantly from their proximity to the convention center. Commercial uses (retail stores, restaurants, etc.) are not expected to reap major benefits because (1) most of the conventioners will be arriving and departing by shuttle bus, (2) most meals will be provided within the facility as part of the convention programs, and (3) the center will only be occupied approximately half of the days of the year (which would not be sufficient to support a restaurant). In addition, most conventioners who may wish to take a shopping break will walk directly to Ala Moana Center.

There are a few office uses which would benefit from a close proximity to the center, but their requirements are small, and it is assumed that most of them already have offices which are serving existing conferences and conventions at Waikiki hotels. In addition, the office market in the Kapiolani corridor is already overbuilt and the demand for additional office complexes in this area is a number of years away.

Industrial and warehousing space for such things as laundry and linen storage, catering supplies, etc., could benefit from close proximity, but the adjacent lands are too valuable for such uses and zoning would not permit large scale operations.

The only other major use which is expected to develop in the area which is indirectly related to the convention center is housing. The Economic/Fiscal Assessment indicates that by 2008 up to approximately 830 new residential units may be needed on the island to accommodate the demand for direct, indirect and induced employment as a result of the convention center activities. Up to approximately 30 of these units could be for employees of the convention center itself (who could benefit from being in close proximity to the center), while the remaining 800 would be for employees working elsewhere in the lodging industry or for other support services in Waikiki and throughout the island. Other than those residents who work directly for the center, or those who may work in new convention-oriented hotels (if any), there are no direct benefits for future residents to be housed in the immediate vicinity.

Given these assumptions regarding potential convention center related uses, what can be expected in terms of redevelopment around the center, particularly on the parcels identified as "Susceptible to Change" in Figure B of the Social Impact

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Analysis, and what will be their impacts on traffic in the immediate vicinity? Using the horizon of year 2005, which is the center's "stabilization" year (as well as the year of the City's regional traffic analysis and the traffic study for this EIS), the redevelopment will generally be driven by regional market demand at that point in time (other than those uses which are directly related to the convention center).

Assuming current zoning will prevail for the sites nearest the center, the following complexes could be developed (see "Susceptible to Change" map):

- Kahakai Loop sites (Zoned A-2) - Approx. 75 residential units (total)
- Atkinson site (Zoned BMX-3*) - Approx. 125-175 residential units or 125,000 - 175,000 gross sq. ft. of retail/office space
- Kalakaua Mauka site (BMX-3) - Approx. 160-225 residential units or 160,000 - 225,000 gross sq. ft. of retail/office space
- Tow Lot site (BMX-3) - Approx. 90-130 residential units or 90,000 - 130,000 gross sq. ft. of retail/office space
- Hard Rock Cafe site (BMX-3) - Approx. 105-145 residential units or 105,000 - 145,000 gross sq. ft. of retail/office space
- VFW site (Zoned B-2) - Approx. 70,000 - 100,000 gross sq. ft. of retail/office space (no residential units permitted)

(* Note: The BMX-3 and B-2 districts have a base FAR of 2.5 but allow up to 3.5 FAR with open space and other bonuses. However, since these are not large properties, achieving the higher FAR may be difficult.)

This adds up to a range of 555 to 750 potential new residential units or 550,000 - 775,000 sq. ft. of retail/office space in immediate proximity to the center. Actual redevelopment of these parcels would probably end up in a combination of residential and retail/office space since most of these parcels are in mixed use zones; however, the total cumulative floor area cannot exceed approximately 850,000 square feet.

As noted previously, the parcel listed above as the Atkinson site could also be redeveloped as a hotel if the current zoning were amended. (The Special Provisions of the City

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Development Plan currently permit hotels in this area.) However, because this site is of limited size, it is estimated that it could only accommodate a hotel of approximately 200 rooms. This means that it could serve well as an "executive" hotel for the convention center, but it would not be big enough to serve as a primary venue for conventioners and would not meet the full hotel demand requirements projected for 2008.

The Waikiki Gateway development across the canal in the Hobron area, which is also identified on the "Susceptibility to Change" map, lies within the Waikiki Special Design District Apartment Precinct, and plans for its redevelopment are currently under reconsideration by its owners. It is assumed, at this point, that redevelopment will include a combination of hotel and residential uses.

If all of these sites were to be developed to the maximum permitted by zoning over the next 10 years, the impact on traffic flows in the region could greatly exceed those projected in the 2005 traffic analysis. However, as noted previously, most of these developments will be market driven and will only be constructed if there is a demand which justifies them. The City's Planning Department, in preparation for the Waikiki Regional Traffic Impact Plan which is currently underway by Kaku Associates, modeled the 2005 population, employment, housing and hotel room distribution for the entire island based on Traffic Analysis Zones (TAZ's). This analysis, completed in May of this year, is the City's best effort to identify the location of future land uses in the area. For residential development, the analysis projected no new housing by 2005 in the three TAZ's surrounding the center (the location of the 555 to 750 new units identified above), while projecting approximately 900 new units (along with approximately 250 new hotel rooms) in the Hobron/Gateway TAZ. The Kaku study (June 15, 1995) took this data together with all the other TAZ's which make up the area covered by the Waikiki Regional Traffic Impact Plan and projected a 15% growth in housing units over the entire study area. This is the same information which has been used to generate the 2005 traffic study for this EIS.

Based on these projections, the actual residential development which could take place on the sites identified above by 2005 could range from a low of no development (following the Planning Department's allocations) to a possible high of 15%

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growth (using the study area growth rate). This calculation results in a range of a low of 0 to a high of approximately 300 housing units or a mid-range of 150 new units by 2005. This is a small number when put into the context of the total study area which is projecting a growth of nearly 6,400 new units and serves as the basis for the 2005 traffic projections. And because this is a market driven system, if up to 300 new units were built on these sites near the center, 300 fewer units would be built somewhere else in the immediate area during the same timeframe, and thus, the overall traffic in the area generated by residential development would remain the same.

The demand for office space in this area by the year 2005 is not anticipated to be significant. As noted previously, the convention center is not expected to create much of a demand, and the presence of the old FAA Building, Century Center and the Pan Am building (which currently have space available) in the immediate proximity, along with the office overbuilding which has taken place along the rest of the Kapiolani corridor, make it doubtful that any new large office buildings will be constructed in this area by that date.

None of these sites is large enough to develop a shopping center, and thus, high volume retailers will probably not be attracted to them. However, stand-alone restaurants (like the Hard Rock Cafe) may be attracted to the area because of the highly visible location, particularly the Kapiolani-Kalakaua intersection. The old VFW site would also make an attractive restaurant location because of its visibility and its proximity to the Ala Wai Canal.

Given this assessment of the 2005 market, what is a reasonable development scenario for the area around the convention center? Using the parcels shown on the "Susceptibility to Change" map, the following redevelopment possibilities appear to be reasonable for the purposes of generating anticipated traffic flows in the area.

- Kahakai Loop sites - 75 residential units
- Atkinson site - 200-room convention hotel
- Kalakaua Mauka site - 225 residential units
- Tow Lot site - stand-alone restaurant
- Hard Rock site - Remains as is
- VFW site - stand-alone restaurant

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As noted previously, the redevelopment of the Waikiki Gateway (Hobron) area which could entail the addition of 1,100 to 1,200 new residential and hotel units, has been included in the Planning Department's growth figures for 2005 and, therefore, should already be covered in the "background traffic" for the 2005 Traffic Study.

In addition, traffic generated by the Waikiki Landmark project has already been added into the 2005 Traffic Study based on its use as a residential complex. However, if it were converted to a hotel, according to our traffic consultants, it would have less of an impact on peak hour flows.

Based on this development scenario for the parcels shown on the "Susceptibility to Change" map, the following increases in traffic volumes are projected for the year 2005 at these intersections:

<u>Intersection</u>	<u>No. of Vehicles</u>		<u>Percentage Increase</u>	
	<u>AM Peak</u>	<u>PM Peak</u>	<u>AM Peak</u>	<u>PM Peak</u>
Kapiolani-Kalakaua	92	142	1.3%	1.8%
Kapiolani-Atkinson	85	71	1.7%	1.4%
Atkinson-Kahakai	56	61	2.2%	3.5%
Ala Moana-Atkinson	33	41	0.6%	0.7%
Kalakaua-Ala Wai	60	77	1.6%	1.8%

In actuality, these numbers are expected to be on the high side because (1) they do not account for existing uses on any of these parcels and therefore they represent total trips and not net new trips, and (2) they do not account for a reduction in the background traffic due to these developments being located here rather than some other location in the Waikiki study area.

The highest percentage increase is at the Atkinson-Kahakai intersection, but once this intersection is expanded and signalized as part of the convention center improvements, it will be able to accommodate this additional traffic. The increases in traffic at the other key intersections, ranging from 0.6% to 1.8% can be accommodated within those

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intersections, assuming the mitigation improvements described for 1998 and 2005 are implemented.

In addition to traffic considerations, development of the convention center and possible redevelopment of the sites identified as "susceptible to change" can impact land values in the immediate vicinity. With the exception of possible hotel development around the convention center, all other redevelopment will be primarily market driven. By its very presence, the center can either encourage or discourage this redevelopment based on its perceived costs and benefits to future users and/or occupants. How this will translate into land values and assessed valuations is very difficult to predict. A number of people who commented on the EIS felt that the problems created by the center would depress land values of properties in the immediate vicinity. (This would also imply that it would not be a desirable place for new residents to move into, and therefore, redevelopment of parcels "susceptible to change" may not take place.) Others were sure that assessed valuations (and therefore rents) would go up simply by constructing the center and redeveloping the sites around it. Inevitably, land values will go up in the long run, simply because we are on an island with a fixed land area and a growing population base. Only time will tell how much they will change in this area, and to isolate the center's attribution to the changes, given all the other factors which come into the valuation process, will be extremely difficult.

The comment that the discussion of tourism does not meet EIS requirements because it fails to discuss the "effects of the proposed action on the economic and social welfare of the community and State" does not give full credit to the depth of analysis provided. The Social Impact Assessment did not just "list" tourism issues. In Section 4.1.1., on page 38 through 41, the assessment acknowledges that the convention center is to enhance tourism and discusses tourism's role in the State's economy. Tourism has a significant role in the economic well-being of the State and community.

The Social Impact Assessment also provides a discussion of social considerations in Section 4.1.3, on pages 42 to 48. The point of the discussion, as stated on page 42, was to present impacts and viewpoints representing a spectrum of concerns related to tourism. These impacts and viewpoints are

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not conclusive, but are intended to stimulate awareness among decision-makers and tourism industry officials.

It is emphasized that, as stated on page 42, "the analysis is not intended to be a comprehensive study of the social impacts of tourism, which would be well beyond the scope of the report (emphasis added)." A full study of Hawaii's visitor industry, such as the 1988 Statewide Tourism Impact Core Study, would be far in excess of assessing the secondary impacts of the convention center as is appropriate for an EIS.

Mitigation Measures

The Convention Center Authority concurs that the types of impacts to be addressed through your recommended temporal and spatial systematic management plans need to be addressed. Since other State and City authorities are involved, however, neither the CCA nor the design/builder can unilaterally commit to the implementation of such plans in the EIS. Nevertheless, the CCA is committed to working with various agencies and authorities to address the impacts of the convention center.

- Traffic Management Plan It is anticipated that the City Department of Transportation Services will request a plan for the management of construction-related traffic. At this time, the construction strategy is in the process of being formulated, and the design-builder will be contacting the DTS to solicit input in the formulation of the plan. Depending on the method of construction formulated, there may be several phases with different construction vehicle access/egress requirements.

The intent of the traffic study in the Draft EIS is to assess potential traffic impacts of the largest events at the convention center and to determine, albeit theoretically, whether or not mitigation measures such as lane widenings, traffic coning and on-street parking restrictions can mitigate such impacts to the degree that conditions are comparable to that of the no-project scenario.

The convention center operator will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for events. It is in the economic interest of the

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convention center operator and convention planners to assure that inconvenience and delays to conventioners is minimized in any transportation plan; otherwise, they risk a tarnished reputation for the center. At the Los Angeles Convention Center, for example, no events are scheduled when conventioners would get caught in the morning peak traffic.

The types of mitigation measures described in the traffic study are a starting point for the preparation of traffic management plans but cannot be so thorough so as to address every conceivable situation at the EIS level of analysis. Many of the suggested mitigation measures will need to be coordinated with the City Department of Transportation and State Department of Transportation, which may require additional or alternative mitigation measures for various events. Also, sites for any necessary off-site parking will need to be arranged. With experience, the transportation coordinator, in coordination with the DTS, will refine the transportation plans to address specific convention transportation needs, address unique conditions such as parades, events at nearby venues such as Ala Moana Park or shopping center, and respond to future changes in traffic management that may be implemented in the vicinity by the City.

- Convention Management Plan The CCA has no role in managing development in the vicinity of the convention center; its authority is limited to the convention center site. The City manages development in the area through its zoning ordinances and is in the position to formulate and implement its own development policy. Nevertheless, as discussed previously, the SIA was revised to offer mitigation measures for consideration. Such measures include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons.

As discussed previously, the convention center operator will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. Conventioneer pedestrian traffic will be managed to the extent of having convention planners suggest walking routes from various hotels and to identify nearby points of interest such as Ala Moana Shopping Center and Ala Moana

Park. There would be no destination of interest that would direct conventioners into or through nearby residential areas.

Vehicular traffic impacts would be addressed as discussed in the preceding discussion of Traffic Management Plan.

As discussed in the Draft EIS, construction noise will be controlled through compliance with DOH noise standards. If noise standards are anticipated to be exceeded, a permit from the DOH will be required which will establish curfews on noisy operations.

Convention center operations must comply with DOH noise standards and violations can result in fines. The designers are determining what structural measures are needed to meet noise standards. The convention center operators must similarly determine what kinds of functions and sound amplification will be allowed on the Rooftop Garden and what types of mitigation may be required to meet the noise standards.

- Possible Enactment of New Ordinances We are not aware of any ordinances regarding truck deliveries to hotels located near beachfront hotels in Waikiki, although the hotels may have rules regarding times they will accept deliveries. Similarly, the convention center operator can impose restrictions on when truck deliveries can be made if trucks should create a noise or traffic congestion problem.

Conclusion

Under the current State system of having project applicants prepare the EIS, we acknowledge that portions of an EIS can take on a tone of advocacy. The EIS format requirements for discussing the need and objectives of the project invite a positive perspective of the project. Likewise, the project description section offers opportunities for discussing how a project addresses or mitigates potential adverse impacts of the project. The critical sections of the Hawai'i Convention Center Draft EIS discussing its environmental, social, infrastructure and public services impacts, however, are candid and to the point.

One of the areas of concern regarding the balance of quantitative benefits in the economic and fiscal impact

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assessment versus qualitative adverse impacts in the social impact assessment was discussed previously.

As a matter of style, we have combined the description of existing conditions followed by a discussion of impacts and, as appropriate, the identification of potential mitigation measures. This format differs from that of some EIS that separate the description of existing conditions from the discussion of impacts. While such a disassociation of the two topics may provide some sense of dispassion, we feel that ours is a more convenient format for the reader to compare the existing conditions with the discussion of anticipated impacts.

Also, as a matter of style, where there are no significant impacts anticipated, we frequently open the discussion of such a topic with a clear statement to this effect. This is followed by a discussion supporting that statement. While this could create a sense that we are rationalizing the proposed action, our intent is to be very clear as to our finding at the very start, as opposed to leading the reader through sometimes lengthy discussion to the finding. This style is frequently used in Federal EIS to allow readers to more easily locate topics where significant impacts are discussed.

We do not feel that the format or style in which the Convention Center EIS is written can be characterized as a "merely a self-serving recitation of benefits and a rationalization of the proposed action." Nevertheless, we have carefully reviewed and revised, as appropriate, the language in the Final EIS to insure that such a characterization would be inapplicable.

Based on the comments provided on the Draft EIS traffic study, we do not concur with your conclusion that "transportation management very likely will only be achievable through investment in a rapid transit system at costs comparable or greater than the Convention Center itself." We found Dr. Prevedouros' comments in the earlier part of your letter to be objective and constructive, but they do not lead to this conclusion. We confirmed this in a follow-up call to Dr. Prevedouros.

When we met earlier with Dr. Prevedouros on March 14, 1995, he expressed a view that the traffic situation in the vicinity of

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the convention center should be addressed at a regional scale in order to consider regional solutions such as a rapid transit system. On the other hand, from our EIS perspective, the intent is to examine the impacts of the convention center on traffic when it opens and to consider mitigation measures that would address those impacts. The convention center project cannot be expected to mitigate regional traffic concerns that currently exist and are anticipated to escalate even if the center were not built. Fortunately, the City's Waikiki Regional Traffic Impact Plan is addressing this regional traffic situation and is examining regional solutions. Since the convention center will be contributing traffic to the region, the CCA is participating on the study's task force and will continue to work with the City on efforts to mitigate future traffic impacts attributable to the convention center.

We do not concur with your comment that the Draft EIS fails to consider the cumulative and secondary impacts of the project. Part of this comment may stem from differences in the use of terminology in the various technical studies.

In the traffic analysis, cumulative impacts on traffic are considered in the projected 1.5 percent growth in traffic levels through 1998 when the convention center opens. The traffic associated with the center is cumulatively assessed with that growth in traffic. Moreover, in response to concerns about more distant future traffic conditions resulting from the cumulative impacts of convention center traffic and the growth of non-convention center-related traffic, we reiterate that a projection of convention center-related traffic at the major intersections in the project vicinity in the year 2005 has been analyzed and will be included in the Final EIS. To account for potential induced development in the project area, the 2005 traffic analysis includes a 0.7 percent per year traffic growth factor and considers a number of proposed or planned projects within the study area which may be developed within that time frame.

Secondary and cumulative economic impacts are assessed both quantitatively and qualitatively in the Economic and Fiscal Impact assessment. Use of the terms "direct," "indirect," and "induced" in the economic context, however, is different from their conventional use in environmental impact assessment; therefore, in the Final EIS these terms are clearly defined. For example, the quantitative assessment of employment related

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to convention center construction and operation is discussed in the study as a "direct" economic impact, whereas, this is clearly a "secondary" impact in the EIS. Similarly, job creation for hotel construction and operation is also discussed as a "direct" economic impact whereas the EIS would regard these as a "cumulative" impact.

Cumulative social impacts are discussed in the Social Impact Assessment, including the identification of areas susceptible to redevelopment, and a discussion of impacts should redevelopment occur, such as changes in property values, displacement, change in demographics, and the overall change in ambiance.

Land development scenarios for parcels surrounding the convention center based on anticipated growth and market demands are described previously in this letter and will be included in the Final EIS as secondary and cumulative impacts. The macro and micro impacts of traffic generated by these developments are also addressed in the context of the 2005 traffic study in order to fully disclose the cumulative traffic impacts when the center reaches its level of stabilization.

The Social Impact Assessment also discusses the social considerations of the cumulative impact that the convention center would have in allowing for the expansion of tourism. These considerations are discussed in topics such as the "Conflicting attitudes towards tourism," "Tourism and urbanization," "Tourism wages and working conditions," "Tourism and Cultural Effects, and "An emerging approach to tourism."

We respectfully disagree that the Draft EIS fails to meet the content requirement established by Chapter 343, HRS. Secondary and cumulative impacts were assessed in the Draft EIS tho the organization and magnitude could have been better presented. Based on public comments, revisions and additional information to supplement the previous findings have been included in the Final EIS to assure its acceptability.

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Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process. Your contribution has led to a much better final document. Mahalo for your comments.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



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Office of the Dean

MEMORANDUM

DATE: March 14, 1995
TO: John T. Harrison, UH Environmental Center
FROM: Chuck Y. Gee, Dean of School of Travel Industry Management
SUBJECT: DEIS, HAWAII CONVENTION CENTER

The School of Travel Industry Management appreciates this opportunity to respond to the Draft Environmental Impact Statement (DEIS) regarding the Hawaii Convention Center (HCC). The planners and designers should be commended for their efforts in trying to accommodate many of the written concerns regarding the physical structure of the HCC. However, after review of the DEIS document, there still appears to be a number of impacts directly resulting from the HCC which have not been adequately addressed. These impacts primarily involve the surrounding area (i.e., the local community) in a number of ways:

LAND DEVELOPMENT

Over the past 20 years, the maximum allowed visitor units in Waikiki has constantly been surpassed, from an established level of 26,000 units in the mid-1970s to an "optimum" level of 30,000 units in 1981, which again was exceeded and now stands at 32,800 (a number which includes all of Waikiki, not just resort-designated areas). Under the Waikiki Special District plan, Special Provisions adopted by the City Council state that: "Any additional high-density development should be discouraged." This view was endorsed by the Waikiki Master Plan produced in 1992. However, the HCC DEIS suggests that the existing hotel room supply would eventually need to be expanded "to achieve the desired level of utilization of the convention center facilities." The study contends that the HCC would create a demand for 7,700 new visitor units in addition to the existing 28,600, creating a total of 36,300 visitor units. (Note: the

discrepancy between 28,600 and 32,800 lies in the latter's inclusion of what constitutes the *total* inventory of visitor units.) Although we concur with this assessment, the DEIS should address the environmental impacts that will result from this hotel expansion since it is likely that the subsequent development and associated traffic would only further intensify the Waikiki area's already well-recognized congestion-related problems.

In addition to Waikiki, other areas potentially impacted by the HCC include the McCully/Mo'ili'ili and Ala Moana/Kaka'ako. According to the HCC DEIS, "a stand alone convention center...creates opportunities for redevelopment and financial gain"...and there is the likely potential that "nearby parcels which are susceptible to change [may be] redeveloped." The fact that higher-density development in these areas can be accommodated within the PUC Public Facilities Map of the study area portends likely growth and added congestion. Some developers have contended that "... the proposed convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built." This claim, however, does not address the problem, nor does it suggest any mitigation measures. It must be reiterated that the construction of a convention center (and subsequent satellite development projects) will alter neighborhood characteristics to a greater degree than if other less-intrusive forms of development were to occur.

The DEIS acknowledges that "if land use policies and laws are modified to allow new uses, such as resort facilities, then the overall characteristic [of the surrounding areas] will be altered." Of particular concern in this case is the renter market. The DEIS reports that 57 percent of the houses in the study area are rentals, a figure that reflects a substantially higher 'rental' market and lower 'owner' market than the Oahu average. Furthermore, the study confirms that the average household size is smaller in the study area by suggesting a significantly high proportion of single person households. These neighborhood characteristics have several implications with respect to the HCC:

- 1) There is a heavy dependence on on-street parking by residents which could lead to potential traffic and off-site street parking congestion and conflicts in neighborhood areas by employees and conventioners during HCC events, particularly those conventions that would draw local participants.
- 2) Neighborhood rental costs will likely increase to cover rises in property taxes (in association with higher property values). This might inhibit the ability for low-wage employees of the HCC to live in close proximity to the HCC forcing them to commute which, in turn, would potentially add to area traffic problems.
- 3) In the event of redevelopment, potential and existing lower-income renters (many of whom are either UH students or employees in Waikiki) will be forced to reside elsewhere. This phenomenon has long been occurring in Waikiki, a situation which the Waikiki Master Plan has attempted to curtail. The construction of the HCC might very well be likened to opening the cork to Waikiki's bottle from which development, social problems and traffic congestion could in effect "spill out" into neighboring areas.

TRAFFIC AND NOISE

Traffic congestion and noise have been cited as being some of the community's primary concerns in the HCC DEIS. However, there is no traffic management plan. Present traffic plans seem to be disjointed – Waikiki Master Plan's proposed one-way "couplets" in Waikiki, the state's jurisdiction over Kalakaua Avenue, and the City's responsibilities for all other affected major roadways. Mitigation responses to potential traffic tie-ups have provided little margin of error in the event of minor mishaps (e.g., an accident or a late-arriving delivery truck). Such incidents are not uncommon, and would create a domino-effect of traffic tie-ups extending beyond the immediate environs. To this effect, the DEIS states: "CCA [Convention Center Authority] does not have the mandate or the funding to solve these problems."

Additionally, there are no traffic mitigation scenarios which address either the potential future expansion of an additional 100,000 square feet to the HCC or the planned area-wide neighboring traffic growth expected over the next decade. As new businesses open to take advantage of the HCC, both pedestrian and vehicular traffic will increase, approaching a possible congestion scenario reminiscent of that of Waikiki in the 1970s before sidewalk- and street-widening beautification projects were undertaken.

Furthermore, the DEIS assumes that 30 percent of HCC employees will be using public transportation. This figure was derived from a study of bus users working in downtown Honolulu's Financial District. However, the degree to which employees of the downtown district are analogous to those working at the HCC is questionable. A more appropriate comparison for the HCC demographically as well as occupationally might be to ascertain the percentage of hotel employees in Waikiki who commute by bus. In addition, a thorough analysis of peak-hour bus ridership (which should include present and potential ridership growth to and from Ala Moana Center, Waikiki, and UH Manoa) should also be made before such "excellent" transportation alternatives could be recommended.

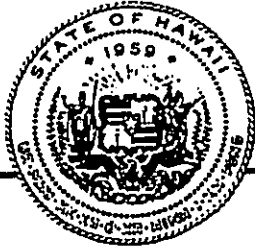
Finally, the noise impact study focused primarily on moving vehicular traffic along nearby roadways. However, the HCC's loading dock location next to the Ala Wai Canal presents a particular noise impact to the surrounding area. Although the loading dock area is planned to be enclosed, the truck stall areas where generators and engines are often left running as well as vehicular movement to and from will be amplified across the Ala Wai Canal. The resulting noise will likely impact adjacent areas, including the proposed Ala Wai Promenade and the apartment district of the Hobron Area as a whole, particularly at night. In addition, the proposed construction of a pedestrian bridge over the Ala Wai Canal from the convention center to the Hobron Area might bring significant increases in pedestrian traffic into this neighborhood, further adding noise and visitor intrusion into what is already a densely-developed residential area.

MITIGATION MEASURES

Most of the suggested solutions to these and other identified environmental impacts have been based on physical design. However, certain community-type issues (i.e., land use and traffic congestion problems) range beyond the site itself and often require more flexible solutions. In the absence of any further physical alterations that can be made as a means to alleviate these impacts, the CCA should concentrate its efforts on the development of temporal and spatial systematic management plans which can treat environmental impacts created by the site. This is most critical in case of the HCC due to the level of urban development which already surrounds the proposed site. As part of the planning and construction of the HCC, mitigation measures might therefore include:

- An interim construction and later peak-hour commute traffic management plan under the various types of convention scenarios to be expected which 1) treats the bottleneck potential of traffic congestion and limited street parking in the area around the HCC holistically (i.e., including secondary and tertiary roadways), 2) describes the implementation and use of such features as coning, signage, sequenced signaling and bus service for the length of all possible roadway impacts due to convention traffic, and 3) identifies an external parking area location/mini-bus transport system for guests (as was alluded to in the DEIS).
- A convention management plan which may include possible staggered convention hours to begin or end either before or after peak rush hour times.
- A land use management plan that will assure that the surrounding neighborhoods are protected from over-development, conventioner pedestrian and vehicular traffic, and excessive construction and convention-related noise.
- Ordinances – What are the existing regulations regarding truck deliveries to hotels located near beachfront areas in Waikiki? Could similar restrictions be applied to convention exhibits loading and transport to mitigate traffic and noise concerns?

✓ c: Convention Center Authority



Convention Center Authority

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July 17, 1995

Mr. Chuck Y. Gee, Dean
School of Travel Industry Management
University of Hawaii
George Hall
2560 Campus Road
Honolulu, Hawaii 96822

Dear Mr. Gee:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 14, 1995 to Mr. John T. Harrison of the UH Environmental Center commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

LAND DEVELOPMENT

The Economic and Fiscal Impact study in the Draft EIS projected that the net new convention-related visitors to the islands will require 7,700 hotels rooms statewide per night by 2008. It does not project that 7,700 additional hotel rooms need to be constructed in order to accommodate this demand.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

In the revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 conventioneer days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room

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occupancy rates at the existing 28,414 units on Oahu from 80 to 90 percent. Another 300 units would be added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it is anticipated that visitor demand (other than conventioners) could be expected to continue to shift to the Neighbor Islands which could be expected to absorb 60 percent of the demand. The remaining 720 units could be met by development on Oahu without rezoning at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas identified susceptible to redevelopment in the vicinity. It clearly states, however, that this impact on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-

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up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

Your comment that other forms of development on this site may be less intrusive is correct to the extent that development less than allowed by current zoning could occur. On the other hand, under current zoning, the ten-acre site can be developed with a mixed-use complex of retail, office and residential structures to a height limit of 350 feet. If such a development were to approach allowable densities, the associated traffic would be comparable to that of the largest convention events of the current proposal and would occur on a daily basis, as opposed to sporadic convention events. While some mitigation measures would be required, such as the widening and dedication of one additional lane of roadway on Kapiolani Boulevard and Kalakaua Avenue, pursuant to Ordinance No. 91-25 (formerly Ord. No. 24-12), no EIS would be required. Without the benefit of an EIS, potential social impacts may neither be identified nor mitigated.

Regarding the specific points raised:

1. Parking within the convention center is designed to accommodate offshore convention events where most of the delegates would be transported to the site by buses. The Blaisdell Center will remain the primary venue for local events. On-going improvements to the Blaisdell Center were funded in the amount of \$13 million by the State specifically to better accommodate local trade-shows and other large local events. Moreover, it is not the intent of the convention center to take business away from hotels with ballroom facilities accommodating smaller conventions, and local events such as wedding receptions. Thus, local events at the convention center are anticipated to be infrequent. To the extent that the convention center parking garage cannot accommodate local parking, event organizers will be required to provide off-site parking. In spite of such measures, on-street parking is available to the general public and, inevitably, some people will choose to seek out such parking, creating additional competition for the limited number of spaces available. The SIA in the Final EIS will address this impact.

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July 17, 1995
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2. To provide a conservative assessment, the traffic study assumes that all convention center employees will commute by automobile or bus.
3. The project's impacts on residential uses in the area are discussed on pages 48 through 65 of the SIA in the Draft EIS. As discussed previously, the SIA in the Final EIS has been revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. This includes an expanded discussion on redevelopment impacts. With respect to your comment that the Waikiki Master plan attempts to curtail the loss of low income rentals, we would point out that the plan actually recognizes that "displacement of lower-cost units with higher-cost condominium apartments is likely to continue in Waikiki, as it would in other districts of Honolulu where land values are high." Also, "clearly, development of affordable housing in Waikiki is unfeasible if land must be purchased." And, while "other alternatives to obtain affordable housing were examined, including the concept of a 'housing linkage program'... from a legal standpoint, it would be difficult to defend treating Waikiki developments differently from hotel and commercial developments elsewhere in the City." (p. 20)

TRAFFIC AND NOISE

We concur with your observation that traffic congestion and noise have been cited as being some of the community's primary concerns in the Draft EIS. A basic transportation management plan, which includes coning operations, temporary signing, and responsibilities of traffic control personnel, will be prepared prior to the opening of the convention center by the Center's transportation coordinator and submitted to the City Department of Transportation Services (DTS) for review. The transportation management plan would include a list of alternative operational measures that could be implemented for various events. Prior to each event, specific alternatives to be implemented will be determined by the convention center's transportation coordinator and the convention planner for the specific event. A discussion of the convention center's transportation management plan will be included in the traffic study and in the Final EIS document.

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Regarding your statement that the present traffic plans seem to be disjointed, we offer the following responses to your specific comments:

- The City's ongoing Waikiki Regional Traffic Impact Plan is intended to examine the regional traffic impacts and future roadway requirements of the area, including reevaluating the change in traffic circulation and patterns of the major streets in the area.
- The City, and not the State, has jurisdiction over Kalakaua Avenue.
- With the primary exception of Ala Moana Boulevard, which is under State jurisdiction, and Kona Street and Mahukona Street which are under private ownership, all other major affected roadways in the convention center study area are under the City's jurisdiction.

The existing roadway conditions in the immediate vicinity of the project site do not provide the excess capacity to mitigate non-recurring incidents such as accidents. Further, this is an existing condition and is not a direct impact of the convention center.

Due to the uncertainty of the time frame for future expansion of the convention center, a supplemental EIS would need to be prepared when the decision is made to pursue such expansion. A traffic impact analysis would need to be conducted for the supplemental EIS. Such analysis could consider the findings of the Waikiki Regional Traffic Impact Plan being prepared by the City and any resulting traffic improvements that may have been implemented.

Based on comments received on the Draft EIS, a projection of traffic conditions in the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan. In addition to

Mr. Chuck Y. Gee
July 17, 1995
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the intersections analyzed in the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR), the 2005 study also includes an analysis of additional intersections in the project vicinity. These additional intersections are those assessed in 1998 conditions to demonstrate that the significantly affected intersections have been considered in the EIS TIAR (the additional intersections analyses will be included in the Final EIS document). Although the analysis of traffic conditions in year 2005 reflects the convention center-related impacts, its primary intent is to demonstrate the conditions that result from the continued growth in traffic not directly associated with the convention center. Its implication will be that the City and State need to work cooperatively to prevent the deterioration of traffic conditions to the degree that it adversely affects the community as well as convention center operations. We note, however, that the developer for any proposed project in the area of the convention center would be responsible to assess the traffic impacts and provide mitigation measures to reduce the impacts accordingly.

Regarding an increase in pedestrian and vehicular traffic resulting from potential new businesses which may open in the area, our assessment indicates that the impacts resulting from such development are not anticipated to be significant because the market for such convention center related businesses appears to be small.

Of the approximately 36 full-time convention center employees assumed to travel to and from work by public transportation during the AM and PM peak traffic hours, most would likely share characteristics similar to the downtown Financial District (i.e., to be in the administrative capacity). Furthermore, these approximately 36 employees would likely be distributed among the major bus routes serving the area and, therefore, should not have a significant impact on the public transit system. Regarding your comment that a more appropriate comparison, both demographically and occupationally, might be to ascertain the percentage of hotel workers in Waikiki who commute by bus, we maintain that the large number of part-time or temporary food service or other workers needed for special events at the convention center may mostly commute by bus. However, as indicated in the EIS TIAR, these employees are assumed to arrive and depart the

Mr. Chuck Y. Gee
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convention center during the off-peak hours of traffic, and therefore, are not expected to impact peak-hour bus ridership.

The loading dock area of the convention center is designed to be enclosed along Ala Wai Promenade and Kalakaua Avenue. All truck loading and unloading activities will occur within the enclosed loading dock area which is designed to accommodate about 12 individual docks, with provisions for a turnaround area. The idling of truck engines and generators will occur within the enclosed loading dock. Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Also, truck noise will not be amplified across the Ala Wai Canal since the loading dock is enclosed on the Ala Wai Promenade side. Furthermore, as indicated in the noise study conducted for the Draft EIS, heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with existing State DOH vehicular noise limits and curfew periods. While your concerns with respect to potential noise and visitor intrusion in the Hobron area are acknowledged, current plans for the convention center do not include any improvements associated with constructing a pedestrian bridge over the Ala Wai Canal.

MITIGATION MEASURES

The CCA concurs that the types of impacts to be addressed through your recommended temporal and spatial systematic management plans need to be addressed. Since other State and City authorities are involved, however, neither the CCA nor the design/builder can unilaterally commit to the implementation of such plans in the EIS. Nevertheless, the CCA is committed to working with various agencies and authorities to address the impacts of the convention center.

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- Traffic Management Plan It is anticipated that the City Department of Transportation Services will request a plan for the management of construction-related traffic. At this time, the construction strategy is in the process of being formulated, and the design-builder will be contacting the DTS to solicit input in the formulation of the plan. Depending on the method of construction formulated, there may be several phases with different construction vehicle access/egress requirements.

The intent of the traffic study in the Draft EIS is to assess potential traffic impacts of the largest events at the convention center and to determine, albeit theoretically, whether or not mitigation measures such as lane widenings, traffic coning and on-street parking restrictions can mitigate such impacts to the degree that conditions are comparable to that of the no-project scenario.

The convention center operator will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. It is in the economic interest of the convention center operator and convention planners to assure that inconvenience and delays to conventioners is minimized in any transportation plan; otherwise, they risk a tarnished reputation for the center. At the Los Angeles Convention Center, for example, no events are scheduled when conventioners would get caught in the morning peak traffic.

The types of mitigation measures described in the traffic study are a starting point for the preparation of traffic management plans but cannot be so thorough so as to address every conceivable situation at the EIS level of analysis. Many of the suggested mitigation measures will need to be coordinated with the City Department of Transportation Services and State Department of Transportation, which may require additional or alternative mitigation measures for various events. Also, sites for any necessary off-site parking will need to be arranged. With experience, the transportation coordinator, in coordination with the DTS, will refine the transportation plans to address specific convention transportation needs, address unique conditions such as parades, events at nearby venues such as Ala Moana Park

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or shopping center, and respond to future changes in traffic management that may be implemented in the vicinity by the City.

- Convention Management Plan As part of the operational transportation management plan for the convention center, the Center's transportation coordinator would have the option of scheduling the large convention events to begin or end during non-peak traffic hours. As previously indicated, at the Los Angeles Convention Center, no events are scheduled when conventioners would get caught in the morning peak traffic. A discussion of the convention center's transportation management plan will be included in the traffic study and in the Final EIS document.
- Land Use Management Plan The CCA has no role in managing development in the vicinity of the convention center; its authority is limited to the convention center site. The City manages development in the area through its zoning ordinances and is in the position to formulate and implement its own development policy.

As discussed previously, the convention center operator will have a transportation manager on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. Conventioneer pedestrian traffic will be managed to the extent of having convention planners suggest walking routes from various hotels and to identify nearby points of interest such as Ala Moana Shopping Center and Ala Moana Park. There would be no destination of interest that would direct conventioneers into or through nearby residential areas.

Vehicular traffic impacts would be addressed as discussed in the preceding discussion of Traffic Management Plan.

As discussed in the Draft EIS, construction noise will be controlled through compliance with DOH noise standards. If noise standards are anticipated to be exceeded, a permit from the DOH will be required which will establish curfews on noisy operations.

Convention center operations must comply with DOH noise standards and violations can result in fines. The

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designers are determining what structural measures are needed to meet noise standards. The convention center operators must similarly determine what kinds of functions and sound amplification will be allowed on the Rooftop Garden and what types of mitigation may be required to meet the noise standards.

- Ordinances We are not aware of any ordinances regarding truck deliveries to hotels located near beachfront hotels in Waikiki, although the hotels may have rules regarding times they will accept deliveries. Similarly, the convention center operator can impose restrictions on when truck deliveries can be made if trucks should create a noise or traffic congestion problem.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

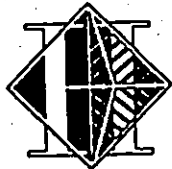
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER THREE

STATE LEGISLATURE
Comments Received and Responses



Hawai'i Convention Center



HAWAII STATE LEGISLATURE
STATE CAPITOL
HONOLULU, HAWAII 96813

March 24, 1995

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC. INC

Convention Center Authority
1833 Kalakaua Avenue, Suite 800
Honolulu, Hawaii 96815
Attn: Alan S. Hayashi

Re: Draft Environmental Impact Statement
Hawaii Convention Center
Tax Map Key: 2-3-35: 01
Honolulu, Oahu, Hawaii

Dear Mr. Hayashi:

Attached are our comments on the Draft Environmental Impact Statement for development of the Hawaii Convention Center facility at the old Aloha Motors site. As elected representatives of districts which will be heavily impacted by the development of the Convention Center facility, we appreciate the opportunity to submit these comments for your consideration in preparation of the Final Environmental Impact Statement.

The planning process for the convention center facility has progressed rapidly over the past 3 years. The selection of the Aloha Motors site and the recent unveiling of the architectural designs for the facility generated a broad array of reactions and comments from the public.

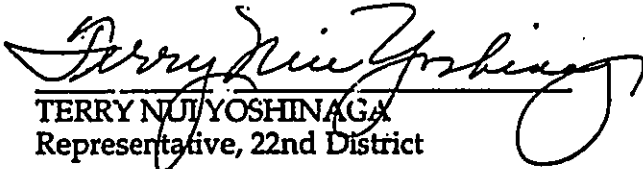
Throughout this period, we have actively worked with area residents, neighborhood boards, tenant associations, and other organizations to insure that their concerns are articulated at this critical stage of the planning process. A comprehensive analysis of all possible impacts in the early phases of the development process will allow for identification of problems and the timely development of alternatives in order to avoid more costly solutions at the later stages of the process.

The following is a synthesis of our major concerns, based on discussions and comments from area residents, government agencies, business and community organizations, and members of the public during many meetings held on the convention center development. Through this process, and the input of numerous technical experts, we believe that a number of critical issues remain to be adequately addressed.

Convention Center Authority
Attn: Alan S. Hayashi
March 24, 1995
Page Two

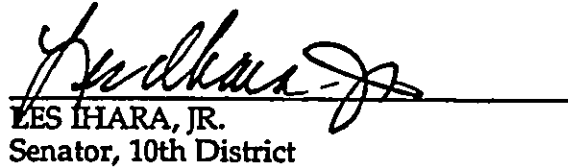
However, we believe that our joint efforts can resolve most of them; and hope that the final environmental impact statement for the Hawaii Convention Center will develop thoughtful solutions to them.

Sincerely,


TERRY NUI YOSHINAGA
Representative, 22nd District

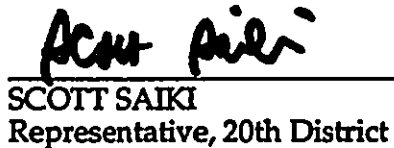

CAROL FUKUNAGA
Senator, 12th District

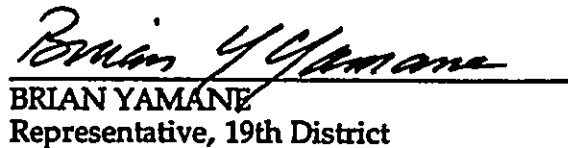

MARY-JANE McMURDO
Representative, 21st District


LES IHARA, JR.
Senator, 10th District


KENNETH T. HIRAKI
Representative, 25th District


BRIAN T. TANIGUCHI
Senator, 11th District


SCOTT SAIKI
Representative, 20th District


BRIAN YAMANE
Representative, 19th District

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

1

LEGISLATIVE COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE HAWAII CONVENTION CENTER

Many respondents have compiled detailed analyses of specific community impacts; as such, our comments will highlight some of the most critical of those impacts.

Traffic and Transportation Impacts

The Transportation Impact Analysis Report (TIAR) in the Draft Environmental Impact Statement (DEIS) was generated in January 1995 to evaluate the anticipated traffic impacts of the Hawaii Convention Center using as the basis for its data the Transportation Impact Assessment conducted by Wilbur Smith Associates (WSA) in 1994 for the Convention Center Authority.

As pointed out by Professor Prevodouros during the March 14, 1995 DEIS meeting broadcast on OLELO, the TIAR uses traffic analysis inputs and assumptions developed in the 1994 WSA study, which was originally intended to provide planners with a "preliminary assessment" of traffic problems anticipated in the area. The TIAR makes no attempt to independently validate or determine the accuracy of the data borrowed from the WSA study (i.e., through its own analyses, or through intersection count data obtained through the City and County of Honolulu), nor does it attempt to support its analyses through the use of statistical models or forecasts. As such, we agree that the overall traffic analyses are seriously flawed and have identified a few of these deficiencies below:

a. Selection of 1998 as an Analysis Year for Stabilized Operating Capacity

Title 11, Chapter 200 Environmental Impact Statement rules states: "The draft EIS shall contain a statement of the probable impact of the proposed action on the environment, which shall include consideration of all phases of the action and consideration of all consequences on the environment; direct and indirect effects shall be included" (emphasis added).

The TIAR states that the analysis year 1998 is based on the assumption that the convention center will be at its stabilized operating capacity in 1998. The KPMG Peat Marwick study on Economic and Fiscal Impacts reflects that stabilization will not occur until sometime between the sixth and eighth year of operation (2003 to 2005) at which time the convention center will be projected to host about 60 events per year, double that projected in the opening year 1998. In order for the DEIS to fully comply with the requirements of the EIS Rules, the impacts of the fully stabilized convention center in the year 2005 must be assessed. Based on the correct stabilization year, the traffic analysis may require substantial revision to reflect the correct traffic growth and associated impacts.

Based on Wilson Okamoto & Associates' comments at a March 14th meeting, the DEIS traffic analysis seems to have assumed 60 events per year in 1998. The key question is: Do EIS Rules require a description of impacts of the convention center in its stabilized operating year?

By not describing the impacts in year 2005, the DEIS does not account for the impacts of increased traffic derived from new developments in the area around the convention center in the center's stabilized operating year of 2005. Clearly, the traffic situation in the year 2005 will be significantly different from traffic in 1998, even assuming 60 events per year. If it is determined that impacts to the environment in the center's stabilized

operating year should be adequately described, then the Convention Center Authority should be required to describe impacts on real property tax assessments, new developments built as a result of the center, etc., in more detail, e.g., quantitative rather than just qualitative terms.

b. Analytical Models for Traffic Analysis

As detailed during the March 14th OLELO broadcast, the TIAR's traffic analysis methods are inadequate to provide accurate evaluations of queue lengths, merging times and spill-backs which already occur around the site, waiting periods anticipated at the convention center parking lot and drop-off areas, and the volumes of traffic currently flowing on the streets of the project site. The DEIS also fails to provide an accurate measurement of the level of improvement (in quantifiable numbers) that the TIAR's traffic improvements and proposed mitigation measures will produce both as of today and as of 2005.

c. Limited Study Area (Traffic Intersections) for Analysis

When viewed from a regional perspective, the traffic impacts of the convention center will likely extend miles beyond the five intersections reviewed in the DEIS (i.e., Kapiolani Boulevard/Kalakaua Avenue; Kapiolani Boulevard/Atkinson Drive; Atkinson Drive/Kona Street/Kahakai Drive; Ala Moana Boulevard/Atkinson Drive; Kalakaua Avenue/Ala Wai Boulevard).

We agree with Dr. Prevodouros and the City and County of Honolulu that the initial scope of review was too limited, and that such areas as Kapiolani Boulevard/McCully Street and Ala Moana Boulevard/Kalia Road intersections should be included in the traffic evaluations.

We concur that the TIAR fails to assess the traffic impacts of adjacent future developments: for example, at least four commercial developments in the immediate neighborhood — the Veterans of Foreign Wars lot, the City impound lot, current redevelopment of the mauka side of Kapiolani Boulevard, and Ala Moana Shopping Center expansion project — as well as nearby Keeaumoku Superblock and other projects in the Kakaako-Waterfront area as well as several residential projects (i.e., Pawaia Redevelopment Project and other projects planned in Kakaako) planned or currently underway.

The combined impacts of all of these developments will seriously affect the flow of traffic in our neighboring Kaimuki, Kapahulu, McCully, Moiliili, Manoa, Makiki, Kakaako and downtown communities.

d. Shuttle Bus Impacts

We agree that the assumptions involving the number of persons who would use shuttle bus services (i.e., approximately 122 trips generated during peak morning periods for a 14,000 person event) appear to be unrealistic.

Because of the number of hotels and variety of attractions available in Waikiki, many attendees may opt to rent their own vehicles, ride the bus or utilize taxis. Thus, even minor deviations in the scenario (i.e., lower-than-100% ridership, etc.) can substantially impact the TIAR's assumptions on traffic flow patterns and parking requirements in and around the facility. There is likewise no analysis of the impact of so many buses on the flow of traffic between Waikiki and the convention center.

Traffic impacts of increased shuttle activity in the convention center area appears to be underestimated. With the two bus bays along Atkinson Drive (immediately makai of the Kapiolani Boulevard / Atkinson Drive intersection), merging activities of the buses will exacerbate the already heavy traffic conditions at this intersection. Further analysis must be made of the impacts of inclement weather conditions on the number of shuttle bus/taxi trips, and for "typically-recurring events" like the 1,000 person event.

Moreover, as pointed out by the City and County of Honolulu in its comments, those attendees projected to use TheBus (i.e., 10% or approximately 1,000 for a 10,000 person event) could cause major disruptions to traffic if they arrive during peak traffic hours. For example, the TIAR fails to address how arriving conventioners would be able to easily cross Kalakaua Avenue to the bus stop at Hard Rock Cafe (where there is no direct pedestrian crossing) to get to the convention center without disrupting traffic and through-flow. We agree that the Final Environmental Impact Statement (FEIS) must include a comprehensive analysis of all pedestrian activities in the area, including an evaluation of pedestrian crossings at the major intersections around the project area.

e. Loss of On-Street Parking and Traffic Impacts upon Kahakai Drive and Other Residents in the Immediate Vicinity

We also agree with the concerns relating to loss of on-street parking and sidewalks, traffic congestion, ingress and egress and related issues raised by residents in the immediate vicinity of the convention center, most notably those in the Kahakai Drive area and those residing across the Ala Wai Canal in the Waikiki-Hobron area (as reflected in individual comments submitted by the Neighbors of the Ala Wai, individual condominium associations, Waikiki Neighborhood Board, and others).

The airing of these concerns at this stage in the development process gives us an opportunity to develop community advisory groups comprised of representatives of the neighborhoods that will be most directly affected by convention center construction, traffic congestion and post-construction event activities. We therefore urge the Convention Center Authority to quickly convene such community-based groups to work with the Authority in mitigating the problems they have identified.

Socio-Economic/Community Impacts

The Socio-Economic Impacts section of the DEIS provides an in-depth quantitative analysis of the positive impacts of the convention center project, but fails to fully investigate the negative impacts that may occur. In terms of the positive impacts, the DEIS reports that the facility will:

1. Contribute \$3.6 billion in direct visitor spending and \$2.8 billion in indirect visitor spending to the State's economy by 2008;
2. Employ an average of 320 construction workers per year during the construction phase of the project;
3. Employ a staff of approximately 350 employees; and
4. Induce the creation of 4,600 new hotel staffing jobs by 2008.

Although the DEIS states that an integrated approach to assessing the project's social, economic, and community impacts is necessary, the analysis in the DEIS seems heavily oriented to the economic results rather than the social implications of the project. Where social impacts

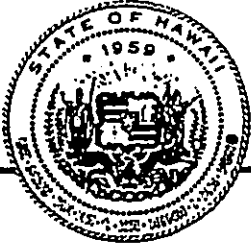
are identified in the DEIS, little discussion is devoted to the development of mitigative measures to resolve these problems. In addition, the land use and socio-economic projections used in the DEIS should be verified with the Planning Department of the City and County of Honolulu to determine if the assumptions are correct.

Among the potential negative socio-economic impacts which must be addressed in the FEIS are:

1. The impact of developing additional hotels in Waikiki and the surrounding community to provide the 7,700 rooms needed to accommodate convention center attendees;
2. The impact of residential redevelopment in the surrounding area as land values increase, including the establishment of new residential buildings either for rental or for sale — especially in the Kahakai Drive area, the Atkinson Drive to Kalauokalani Way area, the makai portion of the Kalakaua-Kapiolani Boulevard intersection; and the Waikiki-Hobron area;
3. The impact of increases in affordable housing rental rates in nearby residential communities and the likelihood of thousands of displaced tenants competing for already scarce affordable housing inventory;
4. The impact of redeveloping nearby commercial properties as economic pressures increase to replace or renovate existing uses (especially in areas bordered by Kona Street and Kapiolani Boulevard);
5. The impact of developing additional project-related facilities such as parking structures and parking lots in adjacent areas;
6. The impact of the facility on parks and recreational resources;
7. The impacts on the delivery of public services, especially police, fire, and ambulance services to residents in the area;
8. The socio-economic costs of traffic congestion to residents and businesses in the area;
9. The loss of neighborhood ambiance, particularly in the McCully area behind Washington Intermediate School and in the Hobron-Ena Road area; and
10. The impact of rising land values and property tax assessments in the adjoining communities.

Taken as a whole, key negative impacts — particularly in the analysis of traffic congestion, transportation impacts on surrounding areas, socio-economic impacts of construction, ingress/egress and post-construction event activity upon residents in the Kahakai Drive area — have not been adequately addressed in the DEIS. We are encouraged, however, by the fact that many respondents have taken the time to identify these impacts and to urge their resolution in the FEIS.

We encourage the Convention Center Authority to initiate discussions with appropriate state and county agencies to (a) identify the scope of negative impacts which must be addressed, and (b) determine the best means of mitigating these impacts. We offer our assistance in facilitating community participation to insure that the negative impacts which have been more fully identified during this public comment process can be resolved as rapidly as possible.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Senator Carol Fukunaga
State Senate
State of Hawaii
State Capital
Honolulu, Hawaii 96813

Dear Representative Fukunaga:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 and your more recent letter dated July 11, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Traffic and Transportation Impacts

The traffic count data derived from the *Hawaii Convention Center Transportation Impact Assessment* prepared by Wilbur Smith Associates (WSA/TIA) for the morning and afternoon peak traffic periods was further validated for the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR). The traffic data in the WSA/TIA was verified by manual traffic count surveys conducted by The Traffic Management Consultant (traffic consultant to the EIS TIAR) and the most recent available data from the City and County of Honolulu Department of Transportation Services (DTS) and the State of Hawaii Department of Transportation (DOT). Furthermore, manual counts were conducted by The Traffic Management Consultant at specific intersections to verify critical turning volumes in the study area. Also, the traffic count data for the mid-day (weekday) peak and Friday evening post-commuter peak period analyses were obtained by manual traffic count surveys conducted for the EIS TIAR. We would also like to point out that traffic volumes used in the EIS TIAR are consistent with the traffic data collected by Kaku Associates in February 1995 for the City's Waikiki Regional Traffic Impact Plan which is currently underway.

The forecasts of non-convention center traffic used in the TIAR is based upon the *Waikiki Regional Traffic Study Final*

Senator Carol Fukunaga
July 17, 1995
Page 2

Report (October 1993) prepared by Cambridge Systematics, Inc. for the City and County of Honolulu. The traffic forecast documentation is contained in the study's *Final Technical Appendix*.

Although we acknowledge that your comments are a synthesis of major concerns raised by various government agencies, organizations, technical experts, area residents and the public, we disagree that the overall traffic analysis is seriously flawed. The convention center team includes four firms which are specialists in transportation planning, two of which are part of national/international organizations with experience in convention center traffic analysis. All of these experts have checked and rechecked the traffic numbers and agree with the findings. Our following responses are intended to clarify the stated concerns and perceived deficiencies.

a. Selection of 1998 as an Analysis Year for Stabilized Operating Capacity

The consideration of "phases of action" is different from the achievement of stabilized operations at the convention center. The concept of phased action would be applicable if a project were to be developed in phases, with each phase of development generating additional impact. In contrast, the proposed convention center will be fully developed and capable of accommodating a full-capacity event at its opening. Stabilized operation means that the frequency of events will reach stabilization, assuming that marketing, over time, will attract more convention events. The size of the full-capacity event will not change unless the center is physically expanded in the future.

Based on comments received on the Draft EIS, a projection of traffic conditions in the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan. In addition to

Senator Carol Fukunaga
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the intersections analyzed in the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR), the 2005 study also includes an analysis of additional intersections in the project vicinity. These additional intersections are those assessed in 1998 conditions to demonstrate that the significantly affected intersections have been considered in the EIS TIAR (these additional intersections are described in response c. below). Although the analysis of traffic conditions in year 2005 reflects the convention center-related impacts, its primary intent is to demonstrate the conditions that result from the continued growth in traffic not directly associated with the convention center. Its implication will be that the City and State need to work cooperatively to prevent the deterioration of traffic conditions to the degree that it adversely affects the community as well as convention center operations.

With respect to assessing traffic, the size of the largest events is the key issue. In response to comments received on the Environmental Assessment for the convention center, the Draft EIS TIAR conservatively assesses the impacts of the full-capacity 14,000 person event which is projected to occur about once in three years at stabilization. Inasmuch as this is such a rare event, traffic studies would not normally include such an analysis. The frequency of the events, however, does not affect the traffic analysis. In the traffic assessment, the impact of the largest event would be no different on a given day, whether it occurred rarely or frequently.

The 1998 analysis year was selected because this is when the convention center is scheduled to open and it is conservatively assumed that the full-capacity event would occur in that year. The opening year is important since this is the time when the traffic impacts of the convention center and the proposed mitigation measures are clearly defined.

The 1998 analysis year includes a projected traffic growth rate of 1.5 percent per year, from the present, at the intersections analyzed. The traffic generated by the convention center is then added to assess the cumulative traffic impact. Consequently, the impact of the convention center is clearly defined. The effectiveness of mitigation measures in addressing convention center-related traffic can also be assessed.

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The impacts of the convention center on the immediate area at stabilization (approximately 2005) are identified in the Economic and Fiscal Assessment and the Social Impact Analysis in the appendix of the FEIS. Traditionally, the one major type of land use activity which benefits from close proximity to a convention center is hotel development. Several sites have been identified for potential hotel use near the center including (1) the area on the ewa side of Atkinson between Kona and Kapiolani, (2) the Waikiki Gateway area and (3) the conversion of the Waikiki Landmark into a hotel. The Economic/Fiscal Assessment identifies a potential demand for 360 to 720 additional hotel rooms in 2008 to support the convention center, or one to two additional standard size hotels. Although these could be developed on the sites identified above, current City policy does not permit hotels on any of them. However, as noted in the Economical and Fiscal Assessment, current zoning does permit hotels on two other sites which could serve the center. One of these is the Kalia Tower on the Hilton Hawaiian Village grounds and the other is within the Aloha Tower complex in the Downtown area. There is considerable public sentiment to continue the cap on hotel development in the Waikiki area, and since the demand for convention center hotel rooms can be met under current City policy, justification for new hotels on the sites around the center is lacking.

Other than hotels, there are no other major land uses which benefit significantly from their proximity to the convention center. Commercial uses (retail stores, restaurants, etc.) are not expected to reap major benefits because (1) most of the conventioners will be arriving and departing by shuttle bus, (2) most meals will be provided within the facility as part of the convention programs, and (3) the center will only be occupied approximately half of the days of the year (which would not be sufficient to support a restaurant). In addition, most conventioners who may wish to take a shopping break will walk directly to Ala Moana Center.

There are a few office uses which would benefit from a close proximity to the center, but their requirements are small, and it is assumed that most of them already have offices which are serving existing conferences and conventions at Waikiki hotels. In addition, the office market in the Kapiolani corridor is already overbuilt and the demand for additional office complexes in this area is a number of years away.

Industrial and warehousing space for such things as laundry and linen storage, catering supplies, etc., could benefit from close proximity, but the adjacent lands are too valuable for such uses and zoning would not permit large scale operations.

The only other major use which is expected to develop in the area which is indirectly related to the convention center is housing. The Economic/Fiscal Assessment indicates that by 2008 up to approximately 830 new residential units may be needed on the island to accommodate the demand for direct, indirect and induced employment as a result of the convention center activities. Up to approximately 30 of these units could be for employees of the convention center itself (who could benefit from being in close proximity to the center), while the remaining 800 would be for employees working elsewhere in the lodging industry or for other support services in Waikiki and throughout the island. Other than those residents who work directly for the center, or those who may work in new convention-oriented hotels (if any), there are no direct benefits for future residents to be housed in the immediate vicinity.

Given these assumptions regarding potential convention center related uses, what can be expected in terms of redevelopment around the center, particularly on the parcels identified as "Susceptible to Change" in Figure B of the Social Impact Analysis, and what will be their impacts on traffic in the immediate vicinity? Using the horizon of year 2005, which is the center's "stabilization" year (as well as the year of the City's regional traffic analysis and the traffic study for this EIS), the redevelopment will generally be driven by regional market demand at that point in time (other than those uses which are directly related to the convention center).

Assuming current zoning will prevail for the sites nearest the center, the following complexes could be developed (see "Susceptible to Change" map):

- Kahakai Loop sites (Zoned A-2) - Approx. 75 residential units (total)
- Atkinson site (Zoned BMX-3*) - Approx. 125-175 residential units or 125,000 - 175,000 gross sq. ft. of retail/office space
- Kalakaua Mauka site (BMX-3) - Approx. 160-225 residential units or 160,000 - 225,000 gross sq. ft. of retail/office space

- Tow Lot site (BMX-3) - Approx. 90-130 residential units or 90,000 - 130,000 gross sq. ft. of retail/office space
- Hard Rock Cafe site (BMX-3) - Approx. 105-145 residential units or 105,000 - 145,000 gross sq. ft. of retail/office space
- VFW site (Zoned B-2) - Approx. 70,000 - 100,000 gross sq. ft. of retail/office space (no residential units permitted)

(* Note: The BMX-3 and B-2 districts have a base FAR of 2.5 but allow up to 3.5 FAR with open space and other bonuses. However, since these are not large properties, achieving the higher FAR may be difficult.)

This adds up to a range of 555 to 750 potential new residential units or 550,000 - 775,000 sq. ft. of retail/office space in immediate proximity to the center. Actual redevelopment of these parcels would probably end up in a combination of residential and retail/office space since most of these parcels are in mixed use zones; however, the total cumulative floor area cannot exceed approximately 850,000 square feet.

As noted previously, the parcel listed above as the Atkinson site could also be redeveloped as a hotel if the current zoning were amended. (The Special Provisions of the City Development Plan currently permit hotels in this area.) However, because this site is of limited size, it is estimated that it could only accommodate a hotel of approximately 200 rooms. This means that it could serve well as an "executive" hotel for the convention center, but it would not be big enough to serve as a primary venue for conventioners and would not meet the full hotel demand requirements projected for 2008.

The Waikiki Gateway development across the canal in the Hobron area, which is also identified on the "Susceptibility to Change" map, lies within the Waikiki Special Design District Apartment Precinct, and plans for its redevelopment are currently under reconsideration by its owners. It is assumed, at this point, that redevelopment will include a combination of hotel and residential uses.

If all of these sites were to be developed to the maximum permitted by zoning over the next 10 years, the impact on traffic flows in the region could greatly exceed those

projected in the 2005 traffic analysis. However, as noted previously, most of these developments will be market driven and will only be constructed if there is a demand which justifies them. The City's Planning Department, in preparation for the Waikiki Regional Traffic Impact Plan which is currently underway by Kaku Associates, modeled the 2005 population, employment, housing and hotel room distribution for the entire island based on Traffic Analysis Zones (TAZ's). This analysis, completed in May of this year, is the City's best effort to identify the location of future land uses in the area. For residential development, the analysis projected no new housing by 2005 in the three TAZ's surrounding the center (the location of the 555 to 750 new units identified above), while projecting approximately 900 new units (along with approximately 250 new hotel rooms) in the Hobron/Gateway TAZ. The Kaku study (June 15, 1995) took this data together with all the other TAZ's which make up the area covered by the Waikiki Regional Traffic Impact Plan and projected a 15% growth in housing units over the entire study area. This is the same information which has been used to generate the 2005 traffic study for this EIS.

Based on these projections, the actual residential development which could take place on the sites identified above by 2005 could range from a low of no development (following the Planning Department's allocations) to a possible high of 15% growth (using the study area growth rate). This calculation results in a range of a low of 0 to a high of approximately 300 housing units or a mid-range of 150 new units by 2005. This is a small number when put into the context of the total study area which is projecting a growth of nearly 6,400 new units and serves as the basis for the 2005 traffic projections. And because this is a market driven system, if up to 300 new units were built on these sites near the center, 300 fewer units would be built somewhere else in the immediate area during the same timeframe, and thus, the overall traffic in the area generated by residential development would remain the same.

The demand for office space in this area by the year 2005 is not anticipated to be significant. As noted previously, the convention center is not expected to create much of a demand, and the presence of the old FAA Building, Century Center and the Pan Am building (which currently have space available) in the immediate proximity, along with the office overbuilding which has taken place along the rest of the Kapiolani

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corridor, make it doubtful that any new large office buildings will be constructed in this area by that date.

None of these sites is large enough to develop a shopping center, and thus, high volume retailers will probably not be attracted to them. However, stand-alone restaurants (like the Hard Rock Cafe) may be attracted to the area because of the highly visible location, particularly the Kapiolani-Kalakaua intersection. The old VFW site would also make an attractive restaurant location because of its visibility and its proximity to the Ala Wai Canal.

Given this assessment of the 2005 market, what is a reasonable development scenario for the area around the convention center? Using the parcels shown on the "Susceptibility to Change" map, the following redevelopment possibilities appear to be reasonable for the purposes of generating anticipated traffic flows in the area.

- Kahakai Loop sites - 75 residential units
- Atkinson site - 200-room convention hotel
- Kalakaua Mauka site - 225 residential units
- Tow Lot site - stand-alone restaurant
- Hard Rock site - Remains as is
- VFW site - stand-alone restaurant

As noted previously, the redevelopment of the Waikiki Gateway (Hobron) area which could entail the addition of 1,100 to 1,200 new residential and hotel units, has been included in the Planning Department's growth figures for 2005 and, therefore, should already be covered in the "background traffic" for the 2005 Traffic Study.

In addition, traffic generated by the Waikiki Landmark project has already been added into the 2005 Traffic Study based on its use as a residential complex. However, if it were converted to a hotel, according to our traffic consultants, it would have less of an impact on peak hour flows.

Based on this development scenario for the parcels shown on the "Susceptibility to Change" map, the following increases in traffic volumes are projected for the year 2005 at these intersections:

<u>Intersection</u>	<u>No. of Vehicles</u>		<u>Percentage Increase</u>	
	<u>AM Peak</u>	<u>PM Peak</u>	<u>AM Peak</u>	<u>PM Peak</u>
Kapiolani-Kalakaua	92	142	1.3%	1.8%
Kapiolani-Atkinson	85	71	1.7%	1.4%
Atkinson-Kahakai	56	61	2.2%	3.5%
Ala Moana-Atkinson	33	41	0.6%	0.7%
Kalakaua-Ala Wai	60	77	1.6%	1.8%

In actuality, these numbers are expected to be on the high side because (1) they do not account for existing uses on any of these parcels and therefore they represent total trips and not net new trips, and (2) they do not account for a reduction in the background traffic due to these developments being located here rather than some other location in the Waikiki study area.

The highest percentage increase is at the Atkinson-Kahakai intersection, but once this intersection is expanded and signalized as part of the convention center improvements, it will be able to accommodate this additional traffic. The increases in traffic at the other key intersections, ranging from 0.6% to 1.8% can be accommodated within those intersections, assuming the mitigation improvements described for 1998 and 2005 are implemented.

In addition to traffic considerations, development of the convention center and possible redevelopment of the sites identified as "susceptible to change" can impact land values in the immediate vicinity. With the exception of possible hotel development around the convention center, all other redevelopment will be primarily market driven. By its very presence, the center can either encourage or discourage this redevelopment based on its perceived costs and benefits to future users and/or occupants. How this will translate into land values and assessed valuations is very difficult to predict. A number of people who commented on the EIS felt that the problems created by the center would depress land values of properties in the immediate vicinity. (This would also imply that it would not be a desirable place for new

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residents to move into, and therefore, redevelopment of parcels "susceptible to change" may not take place.) Others were sure that assessed valuations (and therefore rents) would go up simply by constructing the center and redeveloping the sites around it. Inevitably, land values will go up in the long run, simply because we are on an island with a fixed land area and a growing population base. Only time will tell how much they will change in this area, and to isolate the center's attribution to the changes, given all the other factors which come into the valuation process, will be extremely difficult.

b. Analytical Models for Traffic Analysis

For the purpose of properly responding to your comment, we would like to explain the proper context for the basis of your comment which indicates that the TIAR's traffic analysis methods are inadequate (as detailed during the March 14, 1995 OLELO broadcast of the convention center Draft EIS). This comment was stated by Professor Panos Prevedouros, Associate Professor of Transportation Engineering at the University of Hawaii at Manoa. Professor Prevedouros expressed concern that the analysis methods used in the EIS TIAR are appropriate but not adequate. He indicated that a proper analysis should be augmented by a network analysis using a simulation/optimization software, such as TRANSYT-7F.

According to the *Manual of Transportation Engineering Studies*, Institute of Transportation Engineers, the Highway Capacity Manual (HCM) methodology used in the EIS TIAR is a generally accepted and widely used technique for traffic impact analysis. The HCM methodology does provide for the effects of adjacent intersections on traffic signal progression and takes into account the movement of intersections, including queue lengths, and current volumes of traffic on the streets.

TRANSYT-7F does provide much of the same analysis output as the HCM methodology, plus some assessment of the traffic effects caused by the spacing and timing of other nearby signals. However, the TRANSYT-7F traffic analysis program was developed to assist in the evaluation and design of signal timing for a network of traffic, signal-controlled intersections, and was not primarily intended for use in evaluating impacts of development projects.

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The EIS TIAR does provide a measurement of the level of improvement (in quantifiable numbers) that the proposed mitigation measures will produce as of 1998, the analysis year used in the TIAR. The volume-to-capacity (v/c) ratio provides the best quantitative basis for comparison for both the traffic impacts of the project and the proposed traffic mitigation. The v/c ratio is described as a measure of the relative traffic demand to the roadway's traffic carrying ability. For example, a v/c ratio of 0.50 indicates that the traffic demand is utilizing 50 percent of the capacity of the roadway. The TIAR provides v/c ratios for 1998 conditions without project, 1998 conditions with project and without mitigation (or under existing roadway conditions), and 1998 with project and with proposed mitigation.

Accordingly, the 2005 traffic analysis also provides a measurement of the level of improvement in quantifiable numbers that the recommended mitigation measures will produce as of that year. The 2005 traffic study provides v/c ratios for 2005 cumulative conditions without project, 2005 conditions with project (including 1998 proposed project-related roadway improvements), and 2005 with project and with recommended mitigation.

c. Limited Study Area (Traffic Intersections) for Analysis

In response to comments received on the Draft EIS that additional intersections in the project vicinity should be analyzed for convention center traffic impacts, analyses have since been conducted for the following intersections: Kalakaua Avenue at McCully Street, Kalakaua Avenue at Ena Road, Kalakaua Avenue at Ala Moana Boulevard, Ala Moana Boulevard at Ena Road/Kalia Road, Ala Wai Boulevard at McCully Street, Kapiolani Boulevard at McCully Street, Atkinson Drive at Mahukona Street, Makaloa Street at Kalakaua Avenue, Hobron Lane at Ala Moana Boulevard, and Kapiolani Boulevard at Kaheka Street/Mahukona Street. A copy of the report on these additional intersection analyses will be included in the Final EIS document. The report on the 1998 conditions of these additional intersection analyses, which will be included in the Final EIS document, substantiates the selection of critical intersections initially analyzed, and indicates that the impacts on the other intersections are relatively insignificant.

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While the EIS TIAR acknowledges that the potential projects which could most directly affect traffic conditions near the convention center include development of the former Veterans of Foreign War site and the former Unocal service station site and City impound lot for towed vehicles, development of these parcels are not included in the 1998 study forecasts since the composition and timing of the projects are not known at this time (although the timing will most likely be after 1998). Also, we are unaware of any "current" redevelopment on the mauka side of Kapiolani Boulevard as indicated in your letter. Further, due to pending legal issues concerning the Ala Moana Center expansion, along with the timetable required for construction, it is highly unlikely that the expansion will be completed by the 1998 opening of the convention center.

As the parcels most susceptible to redevelopment in the adjacent area are primarily located within the BMX-3 Community Business Mixed Use District zoning designation, future development could conceivably include condominiums, commercial office/retail uses, and commercial parking lots and garages, among other uses. Further, the City's Development Plan Special Provisions for the Primary Urban Center allow hotels as part of the commercial emphasis mixed-use development in the area bounded by Kapiolani Boulevard, Kalakaua Avenue, the Ala Wai Canal, the medium-density apartment designated area, Atkinson Drive, and Mahukona Street. Nevertheless, even if we were to assume likely project compositions, the uncertainty as to actual composition and timing of such development would preclude a reasonable analysis of traffic impacts. To account for such potential redevelopment, an annual traffic growth rate of 1.5 percent per year through 1998 has been factored into the analysis in the TIAR.

Also, although the full buildout of projects such as those identified in your letter (i.e., Kakaako-Waterfront area, Keeaumoku Superblock, Pawaawaa Redevelopment Project, and other projects planned in Kakaako) are beyond the TIAR's analysis year of 1998, the incremental growth of such projects is assumed to be included in the TIAR's annual traffic growth rate of 1.5 percent.

While growth of traffic beyond 1998 will not be a direct impact of the convention center, it could be reasoned that some of that future growth in traffic could be a cumulative impact of induced secondary growth by the convention center. As discussed in the social impact assessment, due to many

uncertainties regarding the timing and character of development in the area, such induced development cannot be predicted, much less the traffic impacts associated with such development. To account for this, the 2005 traffic analysis includes the 0.7 percent per year traffic growth factor, plus considers a number of proposed or planned projects within the area (those of which specific development have been determined) which may be developed within that time frame.

While we acknowledge that traffic generated by planned projects such as those you identified may potentially impact the respective communities, the developer for each project is responsible to assess the traffic impacts and provide mitigation measures to reduce the impacts accordingly. Further, the increase of traffic from these projects will be addressed through the City's Waikiki Regional Traffic Impact Plan which is currently being prepared and anticipated for completion by August 1995. The study area limits for the City's regional study are the H-1 Freeway, Pensacola Street, Ala Moana Boulevard/Kalakaua Avenue, and Kapahulu Avenue.

d. Shuttle Bus Impacts

Assumptions of Number of Shuttle Bus Riders

As indicated in the EIS TIAR, the 70 percent assumed to ride shuttle buses (14,000-person convention) is similar to the ratio achieved by mainland convention centers without adjacent hotel complexes. For example, according to the manager of the Miami Convention Center (where the concentration of Miami Beach hotels is located 3 to 4 miles from the Center), 80 to 90 percent of attendees at a national convention staying at hotels typically use the continuous all-day shuttle bus system which operates between the Center and the hotels.

Also, the reduction in the walk mode assumed for the 14,000-person convention (10 percent) versus the 10,000-person convention (35 percent) also contributes to the assumption that a higher travel mode split for shuttle buses would be experienced for a 14,000-person convention (70 percent) versus a 10,000-person convention (45 percent).

Potential Deviations in Travel Mode Scenarios

Regardless of the variety of attractions available in Waikiki, the on-site parking capacity of the convention center is based

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on the intended market of off-shore national and international conventions where most of the delegates would be transported to the Center by shuttle buses. With a convenient shuttle bus system to/from the convention center, coupled with market-rate parking fees for on-site parking, there would likely be no incentive for most Oahu visitor delegates to pursue other modes of travel. Given the scheduled events at the convention, it is unlikely that most Oahu visitor delegates would want to travel to the Center via public transit (TheBus) due to unfamiliarity with TheBus schedules or routes, or to find on-street parking around the facility being that they are unfamiliar with the area. Likewise, except for the visitor delegates staying either at outlying hotels in Waikiki or those not serviced or located in proximity to shuttle bus services, or those who would be carrying material or other items to the convention center, most delegates would likely not opt to pay taxi fare in lieu of a convenient shuttle bus service. The impact of shuttle buses on the primary travel routes between Waikiki and the convention center is included in the analysis of all affected intersections in the EIS TIAR.

Underestimation of Traffic Impacts of Increased Shuttle Activity:

The traffic impacts of increased shuttle activity in the convention center area are not underestimated. The two additional bus berths along Atkinson Drive fronting the project site would be used as reserved bus berths should the six berths fronting the lobby be fully occupied. During the AM peak hour, when the shuttle buses are running most frequently, maukabound traffic on Atkinson Drive is relatively light, therefore, merging actions of buses leaving the two bus berths are not expected to impact the flow of traffic. During the PM peak hour, the six bus berths fronting the convention center lobby would more than accommodate anticipated bus loading demands, and therefore, would likely not require use of the reserve bus berths on Atkinson Drive. Furthermore, the planned widening of Kapiolani Boulevard fronting the project site will provide for three eastbound through lanes, resulting in more efficient lane utilization on Atkinson Drive and improved operation of the Kapiolani Boulevard/Atkinson Drive intersection.

In response to your comment that further analysis must be made of the impacts of inclement weather conditions on shuttle bus/taxi trips, please be apprised that the contractor for the

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shuttle bus operations would secure a fixed number of bus vehicles for a specific event and this would not change due to inclement weather. Further, the assumed seating capacity of the shuttle buses can be increased by allowing standing passengers between the hotels and the convention center. According to representatives of local tour bus companies, standing passengers are presently allowed, especially for the shorter distances between destinations. During inclement weather, the shuttle buses are expected to transport visitor conventioners who would otherwise have walked. We emphasize that the purpose of the EIS TIAR is to analyze traffic and transportation impacts of the operations of the convention center for the different event scenarios which could be held at the Center. It is not feasible nor reasonable to analyze every conceivable traffic situation that could occur, much less if the situation is caused by factors totally out of the control of the convention center operations. Furthermore, the purpose of the TIAR is to analyze recurring congestion and not unpredictable incidents such as inclement weather conditions.

Your comment also indicated that further analysis must be made of the impacts of "typically-recurring events" like the 1,000-person event. The 1,000 person event is actually rather small for this facility and it is assumed that many of these smaller conventions will continue to be held at the larger hotel complexes. The average size event projected for the convention center is between 6,200 to 7,500 persons. These are well below the 10,000- and 14,000-person events described in the TIAR, and therefore, the impacts will be proportionately less.

Attendees Use of TheBus and Its Affect on Traffic:

Regarding your comment that attendees projected to use TheBus "could cause major disruptions to traffic if they arrive during peak traffic hours", we would like to put into perspective the basis of the City and County of Honolulu Department of Transportation Services' (DTS) comment on this concern so we can properly respond. The City DTS' concern is that the majority of visitor attendees will disembark at the bus stop fronting the Hard Rock Cafe and will either illegally cross Kalakaua Avenue or cross at the Kalakaua Avenue/Ala Wai Boulevard intersection to get to the convention center. DTS further indicates that the illegal crossing will create a safety concern, and the high number of pedestrians crossing at Kalakaua Avenue/Ala Wai Boulevard may create a delay in the

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through and turning movements at this intersection. Furthermore, DTS indicates that the compounding of vehicles merging and the high number of pedestrians crossing at this intersection must be included in the traffic analysis to determine the level of service (LOS) for the intersection.

First, we wish to clarify that the estimated 10 percent of conventioners (Oahu visitors and local residents) which are assumed to use TheBus to the convention center during the analyzed AM peak hour will amount to about 642 conventioners for a 10,000-person convention, and not 1,000 conventioners as indicated in your comment. According to the EIS TIAR, for a 10,000-person convention, the 10 percent of Oahu visitor and local resident attendees assumed to ride TheBus (610 Oahu visitor and 32 local resident attendees) is based on the number of attendees assumed to arrive during the AM peak hour on a peak convention day.

Second, the EIS TIAR addresses concerns relating to the location of bus stops in the convention center area and recognizes that the closest bus stop for visitors using the Route 2 (maukabound on Kalakaua Avenue) is adjacent to the Hard Rock Cafe. The closest crosswalks, however, are located makai of Ala Wai Boulevard or mauka of Kapiolani Boulevard which may increase jaywalking and the attendant safety concerns. The EIS TIAR recommends that visitor conventioners travelling to the convention center on TheBus should be instructed to disembark at the bus stop mauka of Kapiolani Boulevard (near the Century Center building) to encourage safe crossing. However, some visitor conventioners may opt to disembark at the bus stop at Ala Wai Boulevard (near the Waikiki Landmark). The traffic analysis of the intersection of Kalakaua Avenue and Ala Wai Boulevard includes the estimated volume of pedestrian crossing at this intersection. An analysis of pedestrian activities in the area of the convention center is included in the EIS TIAR. Furthermore, the intersection analyses in the EIS TIAR include the estimated volume of pedestrians crossing at all the affected analyzed intersections.

- e. Loss of On-Street Parking and Traffic Impacts upon Kahakai Drive and Other Residents in the Immediate Vicinity

We acknowledge your stated agreement with the concerns relating to loss of on-street parking and sidewalks, traffic

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congestion, ingress and egress, and related issues by residents in the immediate vicinity of the convention center (as reflected in individual comments submitted by the Neighbors of the Ala Wai, individual condominium associations, Waikiki Neighborhood Board, and others). We will provide a point-by-point response to each of their written comments received through the Draft EIS process. Furthermore, the Final EIS document will address these concerns, as deemed appropriate.

The number of public meetings on the Draft EIS which the State Convention Center Authority (CCA) participated in were intended to allay any misconceptions or misinformation perceived, and to allow the public an opportunity to air their concerns. Throughout the EIS process, we have worked in cooperation with many community organizations and groups in particular with the Convention Center Community Network (CCCN), an organization of legislative representatives, community members and technical experts. The State Convention Center Authority will continue to work with these entities throughout the duration of the planning, design, construction and operation phases of the convention center project. Furthermore, the CCA and project's design/builder, Nordic/PCL, have both established a hotline to respond to concerns raised during the design and construction phase of the convention center.

Socio-Economic/Community Impacts

We disagree with your comment that the convention center's positive impacts were quantified, but its negative impacts were not fully investigated. Clearly, the economic and fiscal impact assessment quantitatively assessed what many would consider the "positive" economic impacts of the project such as job creation and tax revenues. On the other hand, it also quantitatively assessed impacts such as in-migration and the associated costs for City services that some would consider "negative" impacts. The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential primary, secondary and cumulative impacts of the convention center in its vicinity and discusses impacts on the visitor industry and community attitudes to tourism.

With respect to the suggestion that only the economic impacts were quantitatively assessed, it should be emphasized that the economic and fiscal impact assessment relies on available

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quantified economic data and information from various sources on a Statewide, County or industry-wide basis. Hence, factors such as visitor spending rates, hotel occupancy rates, employment, in-migration, and tax revenues produce data that can be documented and utilized in the model. The results of the model are presented in terms of Statewide and County estimates.

On the other hand, the impacts of primary concern with respect to the Social Impact Assessment is on the neighborhood level where a high degree of uncertainty regarding factors such as new residential units, hotel rooms, loss of rental units, etc. limits quantitative analyses. There are several variables which are dependent on the discretion and ability of the private developer, including the desired density of development, financing, the overall economic climate at the time of the development, and the ability of the developer to secure necessary land use entitlements. To quantify assumptions on these variables would be highly speculative. Hence, the Social Impact Assessment qualitatively discusses redevelopment as a potential secondary impact of building the convention center, and also discusses potential impacts arising from this redevelopment as "cumulative" impacts.

The Social Impact Assessment clearly states the impact of the convention center on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change of to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary,

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secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

The information on land use and socio-economic projections was obtained from the City and County of Honolulu Planning Department.

With respect to your list of negative socio-economic impacts, we offer the following:

1. The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

In the revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 convention days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room occupancy rates at the existing 28,414 hotel units on Oahu from 80 to 90 percent. Another 300 units would be effectively added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it

is anticipated that visitors (other than conventioners) will continue to shift their demand to the Neighbor Islands which could be expected to absorb about 60 percent of this demand. The remaining 720 units could be met by development on Oahu, without rezoning, at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

2. Table 9 of the Draft EIS's Social Impact Assessment (Table 10 of the Final EIS's Revised Social Impact Assessment) looks at the potential impact on the areas mentioned, if redevelopment occurs.
3. The discussion on page 56 of the Draft EIS's Social Impact Assessment addresses the impacts of rent increases and displacement if the convention center is built. An expanded discussion is provided on page 65 of the Final EIS's Revised Social Impact Assessment, which includes an estimate of the number of persons that may be displaced.
4. Table 9 of the Draft EIS's Social Impact Assessment (Table 10 of the Final EIS's Revised Social Impact Assessment) looks at the impact of redeveloping commercial properties in the areas mentioned.
5. The Convention Center Authority is not proposing or planning any additional project-related facilities such as parking structures and parking lots in adjacent areas. If such projects utilizing State lands or funds were to be proposed in the future, they would be subject to the requirements of the EIS law.
6. Section 4.3.4 of the Draft EIS's Social Impact Assessment (pages 67 through 69) discusses impacts on parks and recreational resources. An expanded discussion is provided in Section 4.4.4. of the Final EIS's Revised Social Impact Assessment.
7. Sections 4.3.1 through 4.4.3 of the Draft EIS's Social Impact Assessment addresses impacts on the delivery of public services. An expanded discussion is provided in Section 4.4.1. through 4.4.3 of the Final EIS's Social Impact Assessment.
8. Table 9 of the Draft EIS's Social Impact Assessment (Table 10 of the Final EIS's Revised Social Impact

Senator Carol Fukunaga
July 17, 1995
Page 21

Assessment) discusses the social impacts of traffic congestion.

9. Section 4.2 of the Draft EIS's Social Impact Assessment (Section 4.3 of the Final EIS's Revised Social Impact Assessment) contains a full discussion of the convention center's neighborhood impacts, including a specific discussion of the Hobron area. The land ownership patterns in the area behind Washington Intermediate School suggest that redevelopment would largely require parcel consolidation and/or land use variances. While this area certainly may redevelop, the possibilities are highly speculative, when compared to parcels identified in Figure B of the Social Impact Assessment (Figure C of the Final EIS's Revised Social Impact Assessment)
10. Page 56 of the Draft EIS's Social Impact Assessment contains a discussion of the impact of rising land values and property tax assessments. Section 4.3.4 of the Final EIS's Revised Social Impact Assessment provides an expanded discussion of this potential cumulative impact.

Concluding paragraph before closing

The intent of the EIS public review period is to solicit comments that will ensure that the Final EIS is an acceptable document. We believe that this intent has been served and that the revisions in the Final EIS have addressed the comments received on the Draft EIS. The CCA and the design/build team have throughout the EIS process sought the input of agencies and the community in identifying the impacts of the project. As required by Chapter 343, Hawaii Revised Statutes, the EIS discloses the effects of the proposed action "on the economic and social welfare of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects..." Although the EIS must disclose measures proposed for minimizing adverse impacts, it is not necessarily required to mitigate those impacts. Therefore, the EIS can be characterized as a full disclosure document, not a full solution document.

However, the CCA is dedicated to working out solutions to unresolved issues as the project is implemented and looks forward to a continuing dialogue with all concerned parties.

Senator Carol Fukunaga
July 17, 1995
Page 22

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process. Mahalo for your comments.

Sincerely,


Alan W. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

**Identical Response Letters
Sent to**

**The Honorable Les Ihara, Jr.
Senator, 10th District**

**The Honorable Brian T. Taniguchi
Senator, 11th District**

**The Honorable Brian Yamane
Representative, 19th District**

**The Honorable Scott Saiki
Representative, 20th District**

**The Honorable Mary-Jane McMurdo
Representative, 21st District**

**The Honorable Terry Nui Yoshinaga
Representative, 22nd District**

**The Honorable Kenneth T. Hiraki
Representative, 25th District**

**HOUSE OF REPRESENTATIVES**

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

March 24, 1995

Convention Center Authority
1833 Kalakaua Avenue, Suite 800
Honolulu, Hawaii 96815
Attn: Alan S. Hayashi

Re: Draft Environmental Impact Statement
Hawaii Convention Center
Tax Map Key: 2-3-35: 01
Honolulu, Hawaii

Thank you for this opportunity to voice our opinion on the Convention Center Draft Environmental Impact Statement. Our community will greatly be affected by the Convention Center and many of the people we have spoken to are in support of its location and the positive impact it will have on the redevelopment of the surrounding area.

Too many urban core areas like the Lower East Side in New York City and Downtown Los Angeles have been bypassed by development and gone into a steady decline. The tragedy of this pattern, once established it is very difficult to attract the capital and economic interest to the area for quality development.

The following comments address some of the concerns we have heard from our constituents.

Noise and dust problems during construction. A major concern in this area appears to center around the contractor exceeding the regulatory limits during pile driving operations and site grading. A suggested remedy for this is for residents to call the Department of Health and wait for an official to be dispatched to monitor the situation at some unspecified time in the future. Possibly this situation could be mitigated by having the Department of Health place monitoring equipment on site prior to and during these phases of construction. This would alleviate the need for the residents to assume a watchdog type of profile.

The traffic issues appear to have been extensively covered and many feasible possibilities discussed. As the actual plan to be implemented has not yet been determined we would encourage the Authority to publish a preferred solution at the earliest possible date to allow the community adequate time to recommend additional improvements.

Reduction of parking is of particular concern to existing residents of the in the Kahakai Drive area. In the case of Yacht Harbor Towers and the Atkinson YMCA there was a cooperative arrangement made where the patrons of the YMCA are allowed to use the Yacht Harbor Towers parking facilities at no charge. Possibly the facility when not in use could offer space available parking at greatly reduced rates or on a space available basis for free.

In summary, there are a great many concerns which will surround a project of this magnitude and we encourage you to continue to act in a responsible manner addressing them as they arise. We appreciate your past efforts to dialogue in the numerous citizen forums such as the Ololo broadcasts, and hope you will continue as it has been informative and provides a readily available avenue for communication.

Our district will greatly benefit by a project of this type and it is to this end we encourage the Authority to produce a project of the highest possible quality which the community can be proud of. A public facility on this prominent location hopefully will anchor the redevelopment of this area.

Sincerely,



Terry Nui Yoshinaga
Representative
22nd District
Hawaii State House of Representatives
State Capitol, Room 902
Honolulu, Hawaii 96813



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Representative Terry Nui Yoshinaga
House of Representatives
State of Hawaii
State Capital
Honolulu, Hawaii 96813

Dear Representative Yoshinaga:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995
commenting on the subject Draft EIS.

We acknowledge your comment indicating that your community
will be affected by the convention center, and that the many
people you have spoken to are supportive of its location and
the positive impact it will have on the redevelopment of the
surrounding area. We also acknowledge your comment regarding
urban core areas which have been bypassed by development, and
the subsequent difficulty in attracting capital and economic
interest to the area for quality development.

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

1. A number of measures will be incorporated into the
construction plans to mitigate the effects of noise and
dust during construction. To minimize potential noise
impacts on surrounding residences, construction
activities will be required to comply with the State
Department of Health (DOH) noise standards
(Administrative Rules, Title 11, Chapter 43, "Community
Noise Control for Oahu") which imposes construction
curfew times. Within the project site, pre-drilling
through the upper coral layer will be provided for piles
to be set in the lower coral layer. This will reduce
noise by reducing the number of blows which would
otherwise be required to penetrate the upper coral layer.
Construction barriers up to 16 feet high will also be
erected along the Kahakai Drive side of the project site
to further reduce construction noise at nearby
residences.

Representative Terry Nui Yoshinaga
July 17, 1995
Page 2

Several dust control measures will be implemented by the design/builder. These measures include placing a gravel working surface over the entire site; frequently watering exposed dry soil areas, particularly heavily travelled areas within the site; covering trucks hauling materials that could generate significant amounts of dust in transit to or from the site; installing landscaping as soon as possible on completed open areas; and, if necessary to comply with DOH rules, erecting dust screens to protect nearby low-level properties.

2. We acknowledge your comment indicating that the traffic issues appear to have been extensively covered and many feasible possibilities discussed. With respect to your comment that an actual plan to be implemented has not yet been determined and that the Convention Center Authority is encouraged to publish a preferred solution to allow the community adequate time to recommend additional improvements, please be apprised that the Transportation Impact Analysis Report prepared for the environmental impact statement (EIS TIAR) identifies proposed mitigation measures for the respective traffic and transportation impacts resulting from the convention center.

First, a number of roadway improvements to the existing street system will be constructed as part of the convention center project. These include the provision of an additional traffic lane along the project frontages of Kalakaua Avenue and Kapiolani Boulevard, two (2) additional traffic lanes on Kahakai Drive, an additional lane along the project frontage of Atkinson Drive, an exclusive left-turn lane on makaibound Atkinson Drive at Kahakai Drive, and installation of a traffic signal at the intersection of Atkinson Drive/Kahakai Drive/Kona Street.

Secondly, the EIS TIAR offers a number of operational traffic improvements (i.e., coning of traffic lanes and restriction of on-street parking) to mitigate the convention center traffic impacts under certain conditions. The convention center operator will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. The types of mitigation measures described in the TIAR are a

Representative Terry Nui Yoshinaga
July 17, 1995
Page 3

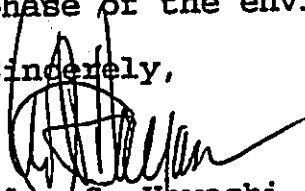
starting point for the preparation of transportation management plans but cannot be so thorough so as to address every conceivable situation at the EIS level of analysis. Many of the suggested mitigation measures will need to be coordinated with the City Department of Transportation Services (DTS), which may require additional or alternative mitigation measures for various events. With experience, the transportation coordinator, in coordination with the DTS, will refine the transportation plans to address specific convention transportation needs, address unique conditions such as parades, events at nearby venues, and respond to future changes in traffic management that may be implemented in the vicinity by the City.

3. We acknowledge the concern of residents of the Kahakai Drive area with respect to reduction of parking. Your suggestion that the convention center offer available on-site parking at reduced rates or on a space available basis will be referred to the convention center operator for future consideration.

We acknowledge your expressed appreciation of our past efforts in participating in the numerous citizen forums.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER FOUR

CITY AND COUNTY OF HONOLULU
Comments Received and Responses



Hawai'i Convention Center



COPY

March 13, 1995

RECEIVED
MAR 15 1995

WILSON OKAMOTO & ASSOC. INC.

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

Subject: Your Letter of January 27, 1995 Regarding the Draft Environmental Impact Statement (EIS) for Hawaii Convention Center, Honolulu, Oahu, Hawaii, TMK: 2-3-35: 01

Thank you for the opportunity to review and comment on the Draft EIS for the proposed Hawaii Convention Center project. We have the following comments to offer:

1. The existing water system is presently adequate to accommodate the proposed Convention Center.
2. The availability of water will be confirmed when the building permit application is submitted for our review and approval. If the development plan requires action by the Department of Land Utilization, the plan should be approved by that department before we take action on the proposed development. Based on the applicant's estimated average day demand of 225,700 gallons per day, the developer will be required to pay our Water System Facilities Charges for resource development, transmission, and daily storage.
3. If a three-inch or larger meter is required, the construction drawings showing the installation of the water meter should be submitted for our review and approval.
4. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.



COPY

Mr. Alan S. Hayashi
Page 2
March 13, 1995

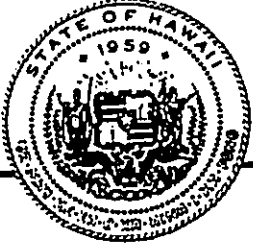
5. Approved reduced pressure principle backflow prevention assemblies are required after the property valves of all domestic water meters serving the project.

If you have any questions, please contact Barry Usagawa at 527-5235.

Very truly yours,

RAYMOND H. SATO
Manager and Chief Engineer

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

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

Dear Mr. Sato:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 13, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The adequacy of the existing water system is acknowledged.
2. We acknowledge the availability of water will be determined when we submit the building permit application, and that we will be required to pay the applicable Water System Facilities Charges.

Regarding your reference to the need for Department of Land Utilization (DLU) approval, please note that the DLU will not be involved in reviewing building permit plans for the Convention Center development. The CCA has indicated that it will not apply for a Plan Review Use permit from the City since its authority on the project site supersedes zoning (Chapter 206X-b, Hawaii Revised Statutes). Therefore, the DLU will not be included in the building permit approval process.

3. Construction drawings depicting proposed water system facilities will be submitted to the BWS for review and approval.
4. On-site fire protection requirements have been coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

Mr. Raymond H. Sato
July 17, 1995
Page 2

5. A BWS-approved reduced pressure principle backflow preventer shall be installed as specified.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

RECEIVED
FEB 23 1995

WILSON OKAMOTO & ASSOC.

PB 95-113

February 16, 1995

Mr. Alan S. Hayashi, Executive Director
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement (DEIS)
Hawai'i Convention Center
TMK: 2-3-35:01
Honolulu, Oahu, Hawaii

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

Thank you for allowing us to review the document.

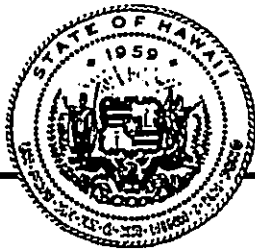
Very truly yours,



RANDALL K. FUJIKI
Director and Building Superintendent

u/CN:jo

cc: G. Tamashiro
Office of Environmental Quality
Control (Gary Gill)
Wilson Okamoto & Assoc. (E. Matsukawa)



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Randall K. Fujiki
Director and Building Superintendent
Building Department
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Fujiki:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 16, 1995 indicating that you have no comments on the subject Draft EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

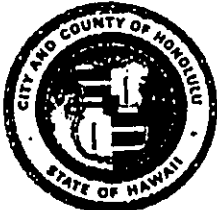

Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo -
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 5TH FLOOR
HONOLULU, HAWAII 96813
PHONE: (808) 523-4427 • FAX: (808) 527-5498

JEREMY HARRIS
MAYOR



RONALD S. LIM
DIRECTOR

ROLAND O. LIBBY, JR.
DEPUTY DIRECTOR

February 27, 1995

RECEIVED
APR 1 1995

Mr. Alan S. Hayashi, Executive Director
Convention Center Authority
State of Hawaii
841 Bishop Street, Suite 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement (Draft EIS)
Hawaii Convention Center
Tax Map Key: 2-3-35: 01
Honolulu, Oahu, Hawaii

This is in response to your letter of January 27, 1995 requesting our comments on the Hawaii Convention Center Draft Environmental Impact Statement. The proposed development does not conflict with any current or proposed projects of the Department of Housing and Community Development (DHCD), and we do not oppose the proposed development.

Should you have any questions, please contact Jason Ching of our Planning and Analysis Division at 523-4368.

Thank you for the opportunity to comment.

Sincerely,


RONALD S. LIM
Director

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Ronald S. Lim
Director
Department of Housing and Community Development
650 South King Street, 5th Floor
Honolulu, Hawaii 96813

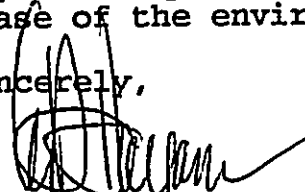
Dear Mr. Lim:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 27, 1995 commenting on the subject Draft EIS. Thank you for confirming that the proposed development does not conflict with any current or proposed projects of your agency.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

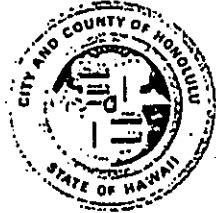
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

DEPARTMENT OF HUMAN RESOURCES
CITY AND COUNTY OF HONOLULU

STANDARD FINANCE PLAZA
715 SOUTH KING STREET
HONOLULU HAWAII 96813



JEREMY HARRIS
MAYOR

SALVATORE S. LANZILOTTI, ED.D.
DIRECTOR

ROBERT AGRES, JR.
DEPUTY DIRECTOR

ADMINISTRATION
2ND FLOOR: (808) 523-4311
FAX: (808) 523-4013

ELDERLY AFFAIRS DIVISION
HONOLULU COMMITTEE ON AGING
5TH FLOOR: (808) 523-4761

WORKHAWAII DIVISION
5TH FLOOR: (808) 523-4102

SPECIAL PROJECTS SECTION
HONOLULU COUNTY COMMITTEE ON THE STATUS OF WOMEN
MAYOR'S COMMITTEE FOR PERSONS WITH DISABILITIES
MAYOR'S CHILD CARE ADVISORY BOARD
5TH FLOOR: (808) 523-6264

March 24, 1995

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC., INC.

Subject: **Draft Environmental Impact Statement (Draft EIS)
Hawai'i Convention Center
Honolulu, Oahu, Hawaii, Tax Map Key: 2-3-35: 01**

Dear Mr. Hayashi:

This is acknowledge receipt of your letter dated January 27, 1995 and accompanying volumes of the Hawai'i Convention Center Draft Environmental Impact Statement.

The Department of Human Resources has reviewed these documents and offers the following comments:

The applicant notes, based on a 1989 study conducted by Peat Marwick Main and Company; that the projected demand for child care was inadequate to justify the development of a day care facility within the Hawai'i Convention Center. We concur with this assessment in light of the projected number of FTE positions that will be generated by the project. But, we recommend that the applicant initiate discussions with other hotels and major employers (i.e. Ala Moana Center and the Waikiki Shopping Plaza) located in the Ala Moana - Waikiki district on the feasibility of a jointly-sponsored day care facility in this region. We believe that, in light of Hawai'i's relatively high cost of living, the number of families that have both parents working will continue to increase thereby generating a greater demand for affordable quality child care services.

Mr. Alan S. Hayashi
March 24, 1995
Page Two

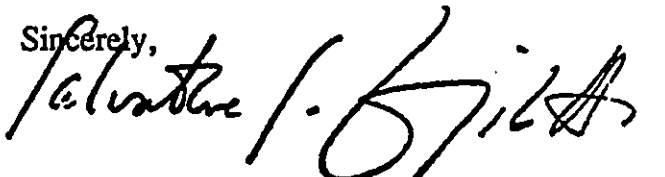
Additionally, there may be a significant percentage of families that have both parents employed in the hotel industry. We believe that this information is readily obtainable through Local 5 Hotel and Restaurant Employees Union. If this is indeed a significant amount, then we additionally recommend that the applicant seek the support and assistance of Local 5 with respect to a jointly-sponsored child care facility in Ala Moana - Waikiki region. We would be pleased to offer our department's assistance should the applicant pursue these recommendations.

We note in your letter of January 27th the project's conformity with the Americans with Disabilities Act (Title II, 36 CFR Part 1191) and consequentially have no further comments to offer in this regard.

Should you have any questions or require further clarifications with respect to our comments, please direct your inquiries to Mr. Ernie Martin of our department's *Special Projects Division* at 527-6264.

Thank you for the opportunity to review and comment on this matter.

Sincerely,



SALVATORE S. LANZILOTTI, Ed.D.
Director

SSL:sps

cc: Mr. Gary L. Gill
Office of Environmental Quality Control
✓ Mr. Earl K. Matsukawa
Wilson Okamoto & Associates, Inc.

a:bawconv.sps



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Salvatore S. Lanzilotti, Ed.D.
Director
Department of Human Resources
Standard Finance Plaza
715 South King Street
Honolulu, Hawaii 96813

Dear Dr. Lanzilotti:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995
commenting on the subject Draft EIS.

We appreciate and concur with your concerns for the need for
affordable quality child care services. While not justified
by the Convention Center's development alone, there is
certainly the need for such services which would assist in the
long term recruitment and retention of employees. Your kind
offer of assistance in pursuing some form of jointly-sponsored
day care facility will be referred to the operator of the
Convention Center.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

DONA L. HANAIKE
DIRECTOR
ALVIN K.C. AU
DEPUTY DIRECTOR

March 20, 1995

RECEIVED
MAR 23 1995

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
State of Hawaii
841 Bishop Street, Fourth Floor
Honolulu, Hawaii 96813

WILSON OKAMOTO & ASSOC INC.

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement (DEIS) for the
Waikiki Convention Center

Thank you for providing us with the opportunity to review
and comment on your DEIS for the Waikiki Convention Center
project.

We have reviewed the DEIS and have no further comments to
make on the proposed project at this time relating to the
environmental impacts associated with the development of the
convention center.

We look forward to continued coordination between your
agency and our department on the development of the Ala Wai
Promenade and the refinement of an acceptable street tree plan.

If there are any questions, please call John Morihara of our
Advance Planning Branch at 523-4246.

Sincerely,

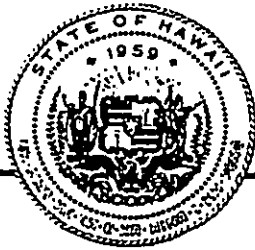
A handwritten signature in cursive script, appearing to read "Dona L. Hanaike".

For DONA L. HANAIKE
Director

DLH:ei

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

Ma'aloa Add Quality to Life



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Dona L. Hanaïke
Director
Department of Parks and Recreation
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Hanaïke:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 20, 1995 commenting on the subject Draft EIS.

Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

With respect to improvements on the Ala Wai Promenade to accommodate pedestrian use, the design/builder continues to be involved in discussions with both your department and the State Historic Preservation Division (SHPD), as well as the City's Exceptional Tree Committee and the Outdoor Circle. The SHPD will be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

Ms. Dona L. Hanaike
July 17, 1995
Page 2

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

We will continue to coordinate with your department on refining the street tree plan. Presently, we are coordinating the relocation of the monkeypod trees for the proposed widening of Kapiolani Boulevard with your department. All monkeypod or other trees relocated as a result of road widening will be replaced with specimens comparable to or larger than those removed.

The design/builder has requested a permit from the City Department of Parks and Recreation pursuant to Section 41-13.8, Revised Ordinances of Honolulu, to conduct excavation that will remove a portion of the root systems and to prune the Banyan trees in the Ala Wai Promenade which are adjacent to the convention center boundary. On-going consultation with the City's certified arborist has been pursued to formulate a plan to minimize adverse impacts to the trees. The plan includes procedures such as for trimming the roots, installing a root barrier, irrigation and monitoring. Procedures and requirements will also be imposed on tree pruning. The design/builder will install an 8-foot high fence along the boundary between the convention center and the Promenade to keep construction activities on convention center property out of the Promenade.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

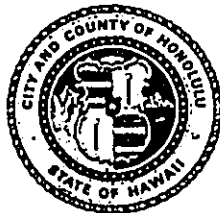
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE
Acting DIRECTOR AND CHIEF ENGINEER

DARWIN J. HAMAMOTO
DEPUTY DIRECTOR

ENV 95-079

March 2, 1995

RECEIVED
MAR 3 1995

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement (DEIS)
Hawaii Convention Center
Tax Map Key: 2-3-35: 01

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

1. All improvements with the City right-of-way should be constructed in accordance with City standards and in compliance with the Americans with Disabilities Act (ADA).
2. If medians are to be constructed, the Convention Center shall be responsible for its maintenance.
3. How is the design at Kahakai Drive going to affect ingress and egress of residents in that area?
4. On Page 1-5, Item 1.6: The City will require construction dewatering permit if there is discharge to the City's storm drain system as a result of the dewatering operation. In addition, a license for connection to the City's storm sewer system is also required.
5. On Page 1-6, Item 1.6.1: Implement best management practices (BMPs) to control and reduce runoff of pollutants from the site.
6. On Page 5-34, Item 5.4.2: Runoff from planters, if possible, should be designed to infiltrate into the ground rather than connect to the City storm drain lines.

Mr. Alan S. Hayashi
Page 2
March 2, 1995

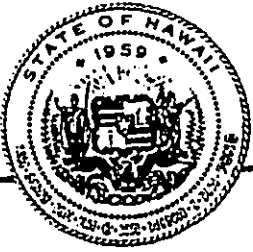
7. On Page 6-2, Table 6-1 and on Page 6-4, Item 6.1: Add "Connection to City's Storm Sewer System" to the list of permits.

Should you have any questions, please contact Mr. Alex Ho, Environmental Engineer, at 523-4150.

Very truly yours,

for Alex Ho
KENNETH E. SPRAGUE
Acting Director and Chief Engineer

cc: ~~OEQC~~
Wilson Okamoto & Associates, Inc.
(Earl K. Matsukawa)



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Kenneth E. Sprague
Director and Chief Engineer
Department of Public Works
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Sprague:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 2, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. All improvements within City right-of-ways will be constructed to City standards and in compliance with the Americans with Disabilities Act.
2. We acknowledge that the convention center will be responsible for maintenance of medians constructed in conjunction with the project.
3. The proposed design of Kahakai Drive is intended to facilitate vehicular ingress/egress for motorists travelling to the convention center, as well as the adjacent residential areas. The segment of Kahakai Drive adjacent to the convention center will be widened by an additional two traffic lanes to provide a total of four lanes (two inbound and two outbound lanes) and a 10-foot wide landscaped median. The two inbound lanes will separate convention center traffic from the residential traffic on Kahakai Drive. The left inbound lane will provide access to the convention center's parking garage and truck dock access, and the right inbound lane will provide access to the residential area of Kahakai Drive. The two outbound lanes will provide separate left- and right-turn lanes onto Atkinson Drive.

Mr. Kenneth E. Sprague
July 17, 1995
Page 2

Also, a traffic signal will be installed at the intersection of Atkinson Drive and Kahakai Drive as part of the convention center project to facilitate vehicular movement into and out of Kahakai Drive. An exclusive left-turn lane into Kahakai Drive will be provided for Kahakai residents and convention center traffic.

4. To control dewatering effluent discharges, the design/builder has applied for a National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activity Dewatering. The permit, which has yet to be approved, offers a Best Management Practices plan that eliminates the need to discharge dewatering effluent except, possibly, during heavy or prolonged storm events. Hence, the permit is requested only for emergency discharges during such storm events. Any required discharges will not be made into the City's storm sewer system.

Installation of the sewer line beneath Atkinson Drive may require the discharge of dewatering effluent, most likely into the City's storm sewer system. If it is determined that dewatering effluent will be discharged, then an NPDES construction dewatering permit will be required. A permit from the City to discharge dewatering effluent into the City's storm sewer system will also be required.

The required license for connection of the project's drainage system to the City's storm sewer system is acknowledged.

5. The design/builder has obtained approval by the State Department of Health of an NPDES General Permit for Storm Water Associated with Construction. The approved NPDES storm water permit requires compliance with a Best Management Practices (BMP) plan. The plan requires compliance with City ordinances pertaining to grading, grubbing, stockpiling, soil erosion and sedimentation. Structural erosion and sediment control measures include constructing berms to contain runoff and installing silt fences to trap

Mr. Kenneth E. Sprague
July 17, 1995
Page 3

sediment. Building and site drainage facilities and landscaping will control soil runoff after completion of the convention center.

6. Runoff from exterior landscape improvements to the Convention Center development will primarily be channeled to drainlines connecting with the Ala Wai Canal. Drain inlets will be screened to filter debris and organic materials.
7. As requested, the "Connection to City's Storm Sewer System" will be added to the list of permits.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



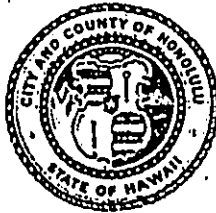
Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

PACIFIC PARK PLAZA
711 KAPIOLANI BOULEVARD, SUITE 1200
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



CHARLES O. SWANSON
DIRECTOR

March 21, 1995

M-21778R
2/95-00598/628R

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
MAR 24 1995

Attention: Mr. Alan S. Hayashi

WILSON OKAMOTO & ASSOC., INC.

Gentlemen:

Subject: Hawai'i Convention Center Draft Environmental
Impact Statement

We have completed our assessment of the Draft Environmental Impact Statement (DEIS) for the Hawai'i Convention Center and are providing the consolidated comments from the following City agencies: Department of Transportation Services, Department of Land Utilization, Planning Department, Office of Waikiki Development, and the Honolulu Public Transit Authority. It is our position that the development of a world class convention center is consistent with and supports the objectives and policies of the General Plan, the Primary Urban Center Development Plan, and the Waikiki Master Plan, and that the Hawai'i Convention Center's location at the entrance to Waikiki will benefit the hotel and tourism industry, and the State's economy in general.

In consideration of the Hawai'i Convention Center's location and its capacity to hold large and small events simultaneously, we believe that there will be times when multiple events will have cumulative effects on pedestrian and vehicular circulation in and through Waikiki and the surrounding neighborhoods. Given the City's responsibility for determining appropriate and compatible land uses and the need for supportive infrastructure, the City recommends that further analysis is required to identify potential regional impacts resulting from the Hawai'i Convention Center and potential mitigation measures. It is possible that these mitigation improvements will be identified over time, perhaps even after the opening, as experience with actual

convention events occur. We would like to see the mechanisms to accommodate these infrastructure improvements and mitigation measures be established at this time and not left to City resources as they occur. The magnitude of these impacts will require close cooperation between the State and the City to ensure effective mitigation measures are implemented. Inherent with any and all potential solutions is their cost. In light of this, the City will be seeking State assistance in the future funding of the necessary improvements.

Because traffic is an important element for the successful operation of the convention center in this urban environment, we have focused many of our comments on the traffic analysis incorporated in Appendix I, "Traffic Impact Analysis Report," (TIAR) of the DEIS. Our comments to the TIAR are intended to be applicable to other relative sections of the DEIS.

The specific comments to the TIAR are as follows:

1. Analysis Year 1998 (Page i-2)

Title 11, Chapter 200 Environmental Impact Statement rules states that, "The draft EIS shall contain a statement of the probable impact of the proposed action on the environment, which shall include consideration of all phases of the action and consideration of all consequences on the environment; direct and indirect effects shall be included (Emphasis added)". The TIAR states that the analysis year 1998 is based on the assumption that the convention center will be at its stabilized operating capacity in 1998. The KPMG Peat Marwick study on Economic and Fiscal Impacts reflects that stabilization will not occur until sometime between the sixth and eighth year of operation (2003 to 2005) at which time the convention center will be projected to host about 60 events per year, double that projected in the opening year 1998. In order for the DEIS to fully comply with the requirements of the EIS Rules, the impacts of the fully stabilized convention center in the year 2005 should be assessed. Because the traffic analysis may require substantial revision to reflect the revised traffic growth and associated impacts, the Office of Environmental Quality Control should be consulted to determine if the correct analysis year has been assumed.

2. Study Area (Page i-3, 1-5)

The TIAR only analyzed the five (5) intersections immediately surrounding the convention center. In addition, the TIAR states that no analysis was included for the Ala Moana/Kalia and Kapiolani/McCully intersections since the WSA/TIA did not identify any significant impacts to these intersections. Although the TIAR limits its study area to the five intersections in the immediate vicinity of the convention center, an analysis of potential regional impacts must still be conducted. An area-wide transportation study has been initiated by the City; however, it is not intended to specifically and solely address the impacts of the subject project. In addition, the City's study will not be completed until this August/September time frame. The study area limits for the City transportation study are the H-1 Freeway, Pensacola Street, Ala Moana Boulevard/Kalakaua Avenue, and Kapahulu Avenue.

The WSA/TIA report has been stated in the DEIS to provide a preliminary assessment of the potential transportation-related effects on the convention center project and identified key issues concerning traffic, parking, public transportation, and pedestrians in the project vicinity. The traffic analysis was stated to have been based on a "generic" convention center with a convention of 10,000 registered attendees during the three to four days of sessions (Page 1-3). In addition, the May 1994 Environmental Assessment prepared by Helber Hastert & Fee for the subject project stated that the Convention Center may have traffic impacts on a regional scale and that such potential impacts should be addressed in the EIS.

The purpose of the TIAR is to make a traffic analysis applicable to the specific Nordic/PCL proposed convention center development to assess the impacts and to determine measures to mitigate these impacts. The site is currently surrounded by a mixture of commercial, residential, and recreational uses, which translates to an existing high volume of vehicular and pedestrian movement throughout the area. It is expected that the convention center development will have an additional impact to the facilities and intersections in the surrounding area. Additional traffic demand may result from the use of Kona Street as a through street for local traffic and right turn demand at Piikoi Street and Keeaumoku Street; additional left turn demand on mauka bound Kalakaua Avenue at Makaloa Street when the left

turn restriction at Kapiolani Boulevard is in effect; additional left turn demand at Kapiolani Boulevard at McCully Street and University Avenue; additional traffic impacts at Atkinson/Mahukona intersection; and additional traffic demand on Kalakaua Avenue at Ala Moana Boulevard.

Therefore, the Final EIS should include a revised TIAR which emphasizes the potential regional circulation impacts along major rights-of-way and intersections in the Ala Moana, McCully/Moiliili, Waikiki, and Kapahulu sub-areas. Additionally, the revised TIAR needs to assess both vehicular and pedestrian trips to non-convention center destinations such as Kakaako Waterfront Park, Kewalo Basin, Ward Warehouse/Center, Ala Moana Beach Park and Shopping Center, Ala Moana Hotel, and Waikiki.

3. Travel Forecast Assumptions (Page i-5, 4-11 to 4-15)

The travel forecast assumptions used under this scenario, similar to the ones used in the Environmental Assessment prepared by WSA, remains very optimistic. The validation or justification for all assumptions should be provided in the TIAR. These assumptions include: 80% of registered conventioners assumed to attend events on a given day; 25% of daily attendees exit during the PM peak hour; relatively low participation by local residents (5%) for large conventions; relatively high walk percentages by distance from the hotels, leading to the overall 35% walk mode split; 5% visitor use of taxis; 2.3 auto occupancy for Oahu resident automobile trips, etc. In addition, justification should be provided for the visitor travel mode percentages; employee travel characteristics (i.e. what assumptions are made that the employee will not drive to work and park their vehicle in the neighborhood instead of the parking garage); and truck and delivery service characteristics (i.e. what is the basis for assuming the truck activity will occur in the 1 to 2 days prior to and following an event, and the number of delivery vehicles per hour).

4. Proposed Roadway Improvements and Operational Mitigating Actions for Convention Center Traffic (Pages i-29 to i-31, 4-7 to 4-10, 4-20 to 4-28)

The improvements proposed by the convention center to mitigate the impacts include the widening by one lane of Atkinson Drive, Kapiolani Boulevard, and Kalakaua Avenue. In addition, Kahakai Drive is planned to be widened to four

lanes with the installation of a traffic signal at the Atkinson/Kahakai intersection.

Kapiolani and Kalakaua: The widening of the roadway facilities on Kapiolani Boulevard and Kalakaua Avenue appear to facilitate the vehicular ingress and egress to the convention center; however, the merging activities of the shuttle buses and taxis exiting the convention center at Kapiolani Boulevard, and merging requirements mauka of the Kalakaua Bridge due to a termination of the lane widening, will impact roadway capacity. The vehicles exiting onto Kapiolani Boulevard will be required to remain in the curb lane and must turn right into Kalakaua Avenue. These same vehicles will then be required to merge back into the adjacent makai bound through lane, mauka of the Kalakaua Bridge. These merging conditions may actually result in motorists avoiding the use of the curb lane on Kapiolani Boulevard and Kalakaua Avenue, thereby impacting traffic flow on these facilities. In addition, this condition will be exacerbated with the planned installation of a new bus stop fronting the convention center on the makai-bound lane of Kalakaua Avenue. TheBus service to this new bus stop will be provided for the existing Route 2 Waikiki-bound buses. At least 150 feet of clear curb space will be required for TheBus to service ADA passengers. The traffic analysis must include the impact of these merging actions and the bus stop, particularly during the PM peak period when the flow of traffic is heavy in the Koko Head direction. The difficulty in the egress of the shuttle buses and taxis onto Kapiolani may also result in the queuing of vehicles back into the shuttle bus loading area, impacting the bus boarding/alighting activities and schedule. If further mitigation improvements are determined to be necessary, consideration should be given to widen the Kalakaua Bridge, as stated in the TIAR as part of a long-range improvement, to provide the additional through lane on Kalakaua Avenue across the bridge and into Waikiki. The cost and environmental considerations should be identified in the EIS. Consideration should also be given to widening Kapiolani Boulevard in the east-bound direction Ewa of Atkinson Drive to provide a separate right turn lane onto Atkinson Drive. The length of the right turn lane should be determined based on the traffic demand.

Atkinson Drive: The TIAR identifies two additional bus bays on Atkinson Drive fronting the project site. The location of these bus bays is immediately makai of the critical

Kapiolani/Atkinson intersection. The merging activities of these buses in the intersection area will exacerbate the already heavy vehicular movements at this intersection during the peak hours. The traffic analysis must take this merging action into consideration in the determination of the intersection capacity analysis. To improve the intersection operation, consideration should be given to eliminate the on-street bus loading and allow the widening of Atkinson Drive to extend into the intersection as reflected in the original traffic circulation plan proposed by Nordic/PCL.

Kahakai Drive: Since Kahakai Drive will be the primary facility for large service and delivery trucks, the widening should provide for 12-foot wide lanes instead of the 10-foot lanes proposed in the DEIS. Sidewalk facilities will be required on the convention center side of the street. The traffic analysis should also assess the impact of convention center vehicles to the residential community motorists egressing onto Kahakai Drive from the internal loop street. These motorists will be crossing 3 to 4 lanes of heavy traffic in the AM and PM peak periods without the benefit of a traffic signal. As a possible mitigation measure, consideration should be given to reversing the loop street direction.

Signalized Intersection at Atkinson/Kahakai: The analysis of the signalized intersection should include the heavy pedestrian movement expected from the Ala Moana Hotel. If that volume is significant, the vehicular capacity of the intersection would be reduced. This analysis should also address the impact on the Kapiolani/Atkinson intersection if the left turn lane into Kahakai Drive is too short to store the expected vehicle demands when Kapiolani operates at the peak cycle length. In addition, the signalized intersection at Atkinson/Mahukona should also be included in the assessment. The TIAR should address the impacts of the Kapiolani Boulevard contra-flow coning during the afternoon peak periods to the City's regular east bound afternoon contra-flow coning. The TIAR should also provide an assessment of the impact at the Atkinson/Kahakai intersection if there is no coning for the left turn movement from Atkinson and how the coning would mitigate the problem. This coning activity will be the responsibility of the convention center and the plan must be approved by the City DTS.

Coning: The CCA is the agency which has the responsibility to effectuate the coning of the affected streets and installation of temporary directional signs for convention center activities. If this responsibility is assigned to the operating manager of the convention center, they will be responsible for the preparation of a traffic plan to identify the location of the temporary signing, the duration of the coning, and the responsibilities of special duty traffic control personnel. The plans shall be completed prior to the opening of the center and assessed and modified, as required, to facilitate the overall traffic operation in the vicinity of the center. The location of permanent guide signs directing conventioners to the center should be identified and installed by the CCA or its operating manager.

Parking Restrictions: The temporary and/or permanent removal of on-street parking resulting from the convention center should be coordinated with the affected businesses and residents. Provisions to replace this parking, as required, should be addressed. The procedure to temporarily remove on-street parking for convention center activities should be clearly specified since the hours and days of the week that these restrictions will be in effect will vary.

5. Worst Case Scenario (Page 1-4)

The worst case scenario is identified in the TIAR as a national convention of 14,000 conventioners. Based on the travel mode characteristics of local residents to conventions, a worst case scenario would occur if several large "local" events were to be scheduled concurrently for the convention center. This scenario would require additional parking facilities for the local conventioners who would drive their cars. Alternative parking provisions and an analysis of their impacts to the roadway facilities in the area should be included in the DEIS unless there is a restriction of these types of events occurring simultaneously at the convention center, or a formal agreement between the CCA and the City and State transportation agencies that require the operating manager of the convention center to comply with and follow the requirements contained in the traffic and parking plan.

6. Existing Conditions (Page 2-5)

The typical traffic volumes reflected in the TIAR are identical to that reflected in the Transportation Plan and Traffic Impact Study prepared by WSA in August 1989. These traffic volumes should be updated to current volumes on these facilities.

7. Number of Analyzed Intersections (Pages 2-11 to 2-15 and Table 2-1)

The TIAR indicates that not all analyzed intersections would be impacted by convention center traffic in the four analyzed time periods. As a result, between three and five intersections are analyzed depending on the time period. The study should conduct traffic impact analyses to support such a statement by including all five intersections in each of the four different time periods. Furthermore, additional intersections should be included in the traffic impact analysis. The five analyzed intersections may not be adequate to evaluate the traffic impacts of the convention center. For example, under 1998 AM peak hour with 10,000-person convention traffic conditions, 327 project trips would be making a right-turn from Ala Moana Boulevard to Atkinson Drive. These 327 trips would have impacted intersections along Ala Moana Boulevard, east of Atkinson Drive, before arriving at the intersection of Ala Moana/Atkinson. Similarly, the 189 trips that travel along Kalakaua Avenue, south of the Ala Wai Boulevard, might impact intersections along Kalakaua Avenue before the trips eventually disperse throughout Waikiki.

8. Land Use and Socio-Economic Data (Page 3-1)

The current land use and socio-economic projections should be verified with the City's Planning Department to determine if the growth projections are correct. The estimated traffic growth and traffic volumes should be adjusted accordingly if there are differences.

9. Reversible Flow Ramp for Parking Access on Kalakaua Avenue (Page 4-5, Figure 4-2)

During the AM peak hour, the flow ramp has been identified as an entrance to the parking garage for the convention center. The ramp would direct vehicles to the first aisle of the parking lot. However, parking is configured to

accommodate traffic in the opposite direction. Consideration should be given to modify the layout of the parking spaces to provide more efficient operation from the reversible flow ramp. One consideration would be to provide two-way travel in the parking lanes to facilitate traffic movement for vehicles entering the center.

10. Visitor Travel Mode by TheBus (Pages 4-13 to 4-14)

The estimated 10% of the conventioners utilizing TheBus will amount to 1,000 conventioners for a 10,000 attendee convention. The majority of these attendees will alight in the PM peak period at the Hard Rock Cafe, makai of the Kapiolani/Kalakaua intersection, where there is currently no direct pedestrian crossing allowed across Kalakaua Avenue. To get to the convention center, these bus users will either cross Kalakaua Avenue illegally or cross at the Kalakaua/Ala Wai Boulevard intersection. The illegal crossing will create a safety concern. The high number of pedestrians crossing at Kalakaua/Ala Wai may create a delay in the through and turning movements at this critical intersection. The compounding of vehicles merging and the high number of pedestrians crossing at this intersection must be included in the traffic analysis to determine the LOS for the intersection. If the analysis determines that further mitigation measures are necessary, a pedestrian bridge to move pedestrians safely and efficiently to the convention center may be a consideration that may need to be further explored.

11. Walk Trips (Page 4-13)

The TIAR does not provide the justification of how the stated proportion (percentages) of conventioners that would walk to the convention center was established for the varying distances. The 35 percent walking equates to 2,130 attendees walking for a 10,000 attendee convention. The 2,130 attendees, coupled with the 1,000 bus users, would result in over 3,000 conventioners utilizing the sidewalks and crossing roadway facilities. This high volume of pedestrian must be included into the capacity analysis of the intersections and sidewalks.

12. Project Impacts for Kalakaua/Ala Wai and Ala Moana/Atkinson (Page 4-24, Table 4-4)

The V/C ratios for these two intersections in the year 1998 with and without the 10,000-person convention reflect that the intersections will be impacted by the convention center traffic; however, the report does not recommend any improvement for mitigation.

13. Project Impacts to Kalakaua/Ala Wai (Page 4-27)

The assessment of this intersection in the TIAR should consider the impact due to the expected number of pedestrian crossings, the shuttle buses and taxis returning to Waikiki from the convention center, and the merging activities mauka of the intersection.

14. Project Impacts to Ala Moana/Atkinson (Page 4-28)

The TIAR has identified the desire to provide for a right turn lane on Ala Moana Boulevard at Atkinson to accommodate the additional volume of traffic making this right turn and has suggested two approaches to provide for this improvement, but does not make a commitment of how the impact will be mitigated. In the assessment, the TIAR states that the two approaches may be impractical due to the potential safety, park land, and cost impacts. If the improvement will not be provided for one or more of these reasons, the TIAR should reflect the impact of the increased traffic without the improvement. In addition, the TIAR states that the one-way traffic conversion on Ala Moana Park Drive may reduce traffic exiting Ala Moana Park Drive at Ala Moana Boulevard, but does not provide an analysis of this condition for the critical peak hour periods. There will be a need to relieve the anticipated volume of convention center-related traffic on Ala Moana Boulevard. An additional crossing of the Ala Wai Canal could provide such relief and should be further explored. Any such crossing, whether vehicular or pedestrian, should be designed to accommodate environmental considerations and be architecturally compatible with the convention center and the Ala Wai Promenade.

15. Travel Mode Split for 14,000 Conventioneers (Page 4-30)

What is the justification for the assumption that a higher travel mode split by shuttle buses (45% vs 70%) would be

experienced for a 10,000 vs 14,000 convention? The maximum 49-passenger seating on shuttle buses appears to be too optimistic.

16. Trip Generation Assumptions for the 14,000 Conventioneers (Pages 4-32 to 4-35 and Tables 4-5 through 4-7)

The TIAR has indicated that this scenario was studied to assume the "worst case" conditions. However, some of the assumptions used under this scenario appears too optimistic. These assumptions include: 80% of registered conventioneers assumed to attend the events on a given day; 25% of daily attendees exit during the PM peak hour; 5% visitor use of taxis; and 70% of the conventioneers taking the shuttle bus to get to the convention center. The TIAR indicates that 70% of shuttle bus riders is based upon "ratio achieved by mainland convention centers without on-site hotels." However, studies from convention centers in the Southern California area indicate that the conventioneers and/or trade shows that draw from a national base have an auto modal split of 25% to 50%.

17. Walk Mode Split for 14,000 Conventioneers (Page 4-32)

What is the justification for the assumption that the walk mode split would be different for a 10,000 vs. 14,000 convention?

18. Project Impact for Atkinson/Kahakai/Kona Intersection (Page 4-40)

The comments relating to this intersection for the 10,000 attendee convention are applicable to the 14,000 attendee convention.

19. Ala Moana Park Drive (Page 4-41)

The TIAR states that the Ala Moana Regional Master Plan's proposed conversion of Ala Moana Park Drive within the park to one-way (Ewa) may reduce traffic exiting Ala Moana Park Drive at Ala Moana Boulevard, which would result in improved traffic operations at the intersection. Ala Moana Park is under consideration by the City as a potential peripheral parking site for Waikiki. Future development of peripheral parking facilities may impact traffic as well as require reconsideration of the Ala Moana Regional Master Plan.

20. Evening Post-Commuter 3,000 Person Event (Page 4-47)

The TIAR states that 40 percent of the 3,000 attendees (1,200) would be local residents. If only 5 percent of the 10,000 (500) conventioners are assumed to be local residents, what is the rationale for the number of local residents attending the evening event exceeding the total number of assumed residents for the convention?

21. Traffic Impact Analysis of All-Local Event (Page 4-53)

The DEIS analyzes the scenario of a one all-local event of 1,800 attendees held on a Friday evening following the afternoon commuter peak period. This may not necessarily be a worst case scenario. It should be assumed that there will be more all-local events held at the convention center to fill the "dark days" between large national/international conventions. Many all-local events will attract attendees in excess of 1,800 people. The revised TIAR should include more scenarios for locally attended events, and describe contingency plans to accommodate these events. Future scenarios should include morning and evening events scheduled on Saturdays and Sundays, and the holiday period between November 26 and January 1. The scenarios need to assess the impacts to the routes local residents are most likely to use when travelling from various parts of Oahu to the convention center. Scenarios should describe travel conditions to and from areas such as Kailua, Hawaii Kai, Kalihi, Aiea, Manoa, Moiliili, and Waikiki.

22. Parking Alternatives (Page 4-60)

The TIAR acknowledges that there may be events which will require more parking than the convention center's 800 stalls can provide. Because the City does not have zoning jurisdiction within the Convention Center Authority's established boundaries, the DLU will not be involved in requiring that off-street parking for the convention center meet Land Use Ordinance (LUO) standards. The TIAR lists a number of possible solutions to accommodate different scenarios, but it is not clear whether these solutions will be implemented.

The 1990 City Council-approved Plan Review Use permit (89/PRU-5) for the convention center complex originally proposed at the site by First Development, Inc. included 2,030 parking stalls on site. Further, an additional

1,000 stalls were to be provided at two nearby parcels-- 600 stalls at the then City-owned Towmasters lot on Kapiolani Boulevard, and 400 stalls at the then State-owned parcel leased by the Veterans of Foreign War (VFW) on Kalakaua Avenue. These two sites are no longer included in the convention center plans. Alternative locations should be secured to replace those off-site parking stalls.

A parking management plan should be prepared identifying which and to what extent off-site parking facilities will be utilized. Arrangements with the parking managers for the use of their parking facilities should also be established prior to the opening of the center. The method and route that the convention center attendees will be transported to the center from these facilities should be identified.

23. Trucks and Deliveries (Pages 4-61 and 4-62)

The TIAR states that trucks are not anticipated to arrive and depart during the morning and afternoon peak hour periods. To prevent this situation from occurring, a convention center policy must be established which would restrict truck activity from arriving or departing the convention center during the morning and afternoon peak periods unless prior approval is provided from the City DTS. The TIAR states that a Special Event Manager should be designated to be responsible for scheduling the arrival of trucks at the site. The convention center must make a commitment that this individual will be provided for all major events, and that the convention center liaison for the center should be identified and that name provided to the City DTS, so that in the event of any problems, the appropriate person can be notified.

24. Public Transportation (Page 4-63)

The TIAR states that public transit would be significantly affected under the 14,000 person convention scenario. The TIAR estimates that 851 Oahu visitors and 81 Oahu residents would travel to the convention center via TheBus in the morning, and 266 Oahu visitors and 54 residents will leave via TheBus in the afternoon. The Final EIS should explain how these figures were determined and whether additional buses would have to be added to the route on convention days.

25. Shuttle Bus Operation (Pages 4-65 to 4-67)

The TIAR states that since the trip generation assumption for the 14,000-person convention depends heavily on the 70% shuttle bus users, all large conventions are "required" to have a shuttle bus operator to plan and coordinate a 60- to 70-shuttle bus system. The average headway for these shuttle buses would be 30 seconds in order to transport the estimated 6,000 conventioners. This also assumes that all shuttle buses would operate at capacity. This assumption may be too optimistic. Additional operational details such as routes and loading points should also be provided in the report for such an extensive shuttle bus system.

The traffic management for the convention center should include working with Waikiki hotels anticipating convention business to ensure sufficient on-site hotel areas for shuttle bus queuing. Provision of such facilities will be crucial to prevent bottlenecks caused by buses idling or on- and off-loading on City streets. Once the convention center is operational, strict enforcement of the City prohibition against on-street loading, off-loading, and queuing will be necessary to ensure smooth traffic circulation in Waikiki.

26. Pedestrian Access (Page 4-67)

There are more than 1,700 visitor units (in facilities with 200 or more units) that are within the identified 10-minute walk zone from the convention center. Better accommodations are needed for pedestrians. Mere relocation of the utility poles at each end of the Kalakaua Bridge will not be adequate to ensure safe and efficient access between the convention center and Waikiki hotels for the volumes of anticipated pedestrian traffic. All routes to the center which will result in a significant increase in pedestrian traffic should be improved. Full width concrete sidewalks should be constructed wherever feasible, and street appurtenances relocated to afford pedestrians with the maximum available clear width.

The TIAR should fully discuss the three options to improve pedestrian access mentioned on Page 4-70: a) Widen the existing Kalakaua Avenue bridge to increase the makai sidewalk by reducing the road width of Kalakaua Avenue; b) construct a new pedestrian-only bridge parallel and adjacent to the makai side of the bridge; and c) construct a

new pedestrian bridge across the canal near the makai end of the convention center site, near Lipeepee Street.

A pedestrian bridge could allow for shuttle buses to unload and load conventioners on Ala Wai Boulevard, reducing travel time. Designated bus bays or depots would need to be provided, as well as an exit route for the buses. Costs, environmental impacts, permit requirements, and construction time frame estimates should be provided for each option, as well as a recommendation on the preferred alternative.

27. One-Way Street Couplet (Page 5-1)

The inability of the convention center's design to accommodate the circulator road necessary for the City to implement a one-way counterclockwise circulation option will necessitate significant land acquisition on the mauka side of Kapiolani Boulevard if the one-way counterclockwise option is pursued. A commitment by the State to participate in the future funding of these potential improvements should be established.

28. Drop Off/Pick Up at Main Entry (Pages 5-4 to 5-5)

The TIAR correctly points out that the drop-off/pick-up area at the convention center's main entry which is designed for a right turn in from Atkinson Drive and right turn out onto Kapiolani Boulevard conflicts with the one-way counterclockwise option being contemplated by the City. We agree that several improvements to modify the bus/taxi ingress/egress onto the site would be required should the one-way counterclockwise option be pursued.

29. Proposed Traffic Patterns and Effect on Vehicle Routes

The need for shuttle buses and taxis to enter the site via a right turn from Atkinson Drive will dictate the routes these vehicles travel from Waikiki hotels. The TIAR should provide analysis of these routes from various sections of Waikiki and their traffic impacts on Ala Wai Boulevard, Ala Moana Boulevard, Waikiki's mauka-makai streets, and various intersections including: Niu/Kalakaua, Ala Wai/McCully, Ala Wai/Niu, Ala Moana/Kalia and Ala Moana/Hobron.

The City is pursuing development of the "lanai street" or "cafe street" concept (which is described in the Waikiki Master Plan). Phase I of the lanai street development was

completed last September for Kaiulani Avenue, Lewers Street, Royal Hawaiian Avenue, and Seaside Avenue, with Phase II for these four streets scheduled to begin shortly. Analysis of the impacts of shuttle bus service on these four streets in particular should be provided in the TIAR.

30. People Mover System (Pages 5-7 to 5-8)

A preliminary People Mover route has been identified in the City's draft Waikiki People Mover and Peripheral Parking Study. It begins at the Ala Moana Shopping Center and travels along Atkinson, Kalakaua, Kapahulu, Kuhio, Olohana, Saratoga, Kalia, Ala Moana, and back in a modified figure eight pattern. The convention center is among the key stop locations identified along the route. We agree that the People Mover System stated in the TIAR could increase the transit capacity in Waikiki and enhance transit access between Waikiki and the convention center. Accommodation should be made on site at the center for system vehicles in order for the People Mover system to enhance transit access between Waikiki and the convention center.

31. Peripheral Parking (Page 5-8)

The TIAR states that "development of peripheral parking facilities near the convention center could provide some additional parking needed to accommodate large local events at the center in the evenings, or for the large number of food service workers needed for large banquets."

As currently contemplated by the City, development of peripheral parking would primarily serve Waikiki employees in order to reduce the volume of traffic entering Waikiki. Most Waikiki workers are shift workers. Some joint use of peripheral employee parking could be available--for example, the food service workers servicing convention center banquets.

32. NETSIM Program

The input and output data files for the NETSIM program used for this project should be provided to DTS.

In addition to the comments on the traffic analysis, we also have urban design comments. These are as follows:


- Material, finishes and colors should be non-reflective and subdued in appearance.
- All lighting should be subdued or shielded so as not to produce glare and light spillage to surrounding properties and public right-of-way.
- The DEIS states that landscaping along the Kahakai Drive edge of the garden will attenuate noise and provide privacy for the recreation deck at the adjacent Summer Palace Condominium (Page 2-21). It is our understanding that landscaping does not mitigate noise.
- The pile driving operations are expected to cause temporary noise and ground vibration impacts during the construction period. The DEIS refers to Section 3.15.3 for mitigation measures (Page 3-27), but there is no such section in the DEIS. A possible mitigation measure may be consideration of drilled caissons instead of pile driving.
- Work within the Ala Wai Promenade is within the Waikiki Special District, and may require a Special District Permit. It appears that planters, stairways and water feature are proposed to encroach a maximum of 26 feet into the promenade. This work will require a Minor Special District Permit.
- The Ala Wai Promenade (TMK: 2-3-35:11) is owned by the State and leased to the City and County, and is eligible for the National Register of Historic Places. In addition, Exceptional Trees are listed within the parcel and any impact to these trees must be approved by the Arborist Committee. These trees and all work which impact any of these trees shall be identified within the EIS.
- Encroachment of any structure which exceeds 30 inches in height into the Ala Wai Promenade should be avoided or minimized as much as practicable.

Convention Center Authority
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Page 18

- Walls of structures below the tree canopy line and directly facing the Ala Wai Promenade should be CRM to be compatible with the existing improvements within and along the Ala Wai Canal.

Thank you for this opportunity to comment. If there are any questions, please contact Marvin Char at 527-6978.

Respectfully,

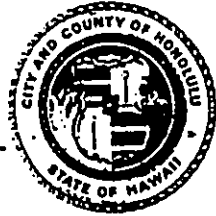


CHARLES O. SWANSON
Director

cc: ✓ Office of Environmental Quality Control
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Honorable Jeremy Harris, Mayor
Mr. Ben Lee, Managing Director's Office
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Planning Department
Office of Waikiki Development
Honolulu Public Transit Authority
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DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

PACIFIC PARK PLAZA
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JEREMY HARRIS
MAYOR

CHARLES O. SWANSON
DIRECTOR

June 1, 1995

MC-00100

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Attention: Mr. Alan S. Hayashi

Gentlemen:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement
Responses to City Comments

We have reviewed your draft letter of May 2, 1995 reflecting the draft responses to our March 21, 1995 comments on the Draft EIS for the Hawai'i Convention Center. Our comments to these responses represent a consolidation of the comments from the Planning Department, Office of Waikiki Development, Department of Land Utilization, Honolulu Public Transit Authority, and Department of Transportation Services, and are based on our May 12, 1995 meeting, and the subsequent meeting with Mr. Philip Rowell of Barton-Aschman Associates on May 17, 1995.

From these meetings and discussions, it is our understanding that Wilson Okamoto & Associates will be revising the Traffic Impact Analysis Report (TIAR) for the Hawai'i Convention Center to provide a Year 2005 Analysis which will incorporate those conditions that are identified by the Planning Department to be in place by the horizon year. The existing data to be used in the analysis will include the 1995 traffic counts from your consultants, supplemented, as necessary, by the traffic counts performed by Kaku Associates. A traffic growth rate of 8% (approximately 1% per year) will be added for the period from 1995 to 2005. In addition, an additional ten (10) intersections will be incorporated into the study analysis as reflected in your May 2 draft responses to analyze convention center impacts to the project vicinity. Significant impacts will be identified for those intersections which result in an increase in the V/C ratio of 0.02 or greater.

It is very probable that the revised 2005 analysis will identify additional impacts as a result of the convention center development. Continued coordination will be required to develop an

EIS that "represents an informational instrument which fulfills the definition of an EIS and adequately discloses and describes all identifiable environmental impacts and satisfactorily responds to review comments." In light of this, it would be reasonable and prudent to provide the City an opportunity to provide comments to the revised Traffic Impact Analysis Report before the Final EIS is issued.

Our specific comments to your May 2 responses are as follows:

1. Analysis Year 1998

- Based on our understanding of the May 12 and 17 discussions reflected above, your preliminary response of May 2 is no longer applicable. However, we would appreciate a letter to confirm our understanding of the discussions. We would like to point out that although the Waikiki Regional Traffic Impact Plan Study being conducted by Kaku Associates will address general traffic growth as a result of planned developments as an aggregate, it was not intended to specifically identify the impacts and mitigation measures resulting specifically from the convention center development.
- Your response relating to the 14,000 person convention event does not adequately address our comments. Although the 14,000 person convention event is anticipated to be infrequent, the EIS should identify the mitigation measures which would be employed when these events do occur. Our comment to the approach provided in the DEIS is that the assumptions should remain the same and not be changing with the size of event.
- We concur that the tertiary impacts of induced secondary growth cannot be predicted. However, it is highly probable that the likelihood of induced secondary growth will occur as a result of the convention center. The probability for redevelopment and potential tertiary impacts is strengthened by recent purchases and/or consolidation of properties in close proximity to the convention center. As such, we maintain that the probability for induced secondary development and potential tertiary impact is high. We reiterate that the Final EIS should acknowledge redevelopment as an unresolved issue.
- We disagree with the belief that future hotel developers will benefit from the traffic mitigation provided by the convention center. We do not agree that future hotel development will be promoted and that City policies will be compromised at the expense of the convention center. Developers of future hotels or mixed use projects will still be required to address potential traffic impacts and to provide appropriate mitigation measures.

2. Study Area

- It is our understanding that the study area has been expanded.
- The TIAR should assess both vehicular and pedestrian trips to non-convention center destinations. If the "net difference" in trips by conventioners versus non-conventioners to non-convention destinations is considered insignificant, the methods or data which indicate this should be cited in the Final EIS.

3. Travel Forecast Assumptions

- Your response does not adequately address our concerns. As stated in the May 12 meeting, the assumptions must be validated with the appropriate justification. This justification should normally be in the form of referencing documentation and/or reports which provide actual data or normally accepted guidelines for convention centers with conditions similar to Honolulu. If this is not possible, the justification could be based on the individual's knowledge of similar convention center operations. However, it should provide information such as the name of the reference and his background, what convention centers are being referenced, what was the basis for their statements, what are the similarities to Honolulu's urban setting, etc.
- The assumptions that have been properly validated should be used consistently throughout the analysis instead of changing the assumptions for different conditions (i.e. for the 10,000 vs 14,000 convention- the walk mode percentage split, shuttle bus capacity, etc. should be consistent). The travel mode analysis conducted at the Honolulu International Airport does not appear to be for a situation comparable to the convention center. Therefore, the basis for the airport analysis needs to be described in further detail. If alternative parking provisions are to be provided for employees during certain large conventions, these locations should be identified or the impacts of the employees parking in the neighborhood and Ala Moana Center should be addressed in the EIS.

4. Proposed Roadway Improvements and Operational Mitigation Actions for Convention Center Traffic

- Merging activities on Kapiolani: Your response does not address our comment on this issue. We do not believe that the TIAR has adequately addressed the impact on Kapiolani Boulevard by the shuttle bus merging activities. The EIS TIAR's analysis of shuttle buses exiting the lobby area during the afternoon

peak hour should provide the signal phasing and signal timing to accommodate the expected 2005 vehicular and pedestrian volumes at the Kapiolani/Kalakaua intersection.

- **Merging Activities on Kalakaua:** Your response does not adequately address our comment on this issue. The creation of the bus bay on the Ewa side of Kalakaua adjacent to the convention center is a deviation from the original proposal for four (4) through lanes of traffic in the makai direction on Kalakaua. Additionally, these buses will require merging activities on Kalakaua Avenue mauka of the bridge. The statement on page 10 of the response states, "The merging activities of vehicles exiting the parking garage onto Kalakaua Avenue would not interfere with the commuter peak period since these events would normally conclude later in the evening." This statement is not correct since the TIAR reflects 52 vehicles exiting during the afternoon peak hour. The analysis at this location should include the vehicular, pedestrian and merging movements at the Kalakaua and Ala Wai Boulevard intersection and should address the intersection signal phasing and signal timing to accommodate the 2005 vehicular and pedestrian volumes for the Kalakaua/Ala Wai intersection.
- **Egress of Shuttle Bus Loading Area:** Your response does not adequately address our comment on this issue. The afternoon peak hour traffic currently queues back on Kapiolani Boulevard to Kaheka Street. Although the TIAR reflects a higher volume of shuttle buses exiting onto Kapiolani Boulevard in the morning peak vs the afternoon peak (194 vs 71), the significant increase in background traffic on Kapiolani Boulevard for the afternoon peak (2364 vs 450 through, 864 vs 591 right turn) implies that the afternoon peak may be the more critical period, particularly in relation to the merging activities. Please provide the analysis which was conducted to arrive at your conclusion.
- **Kalakaua Bridge Widening:** Your response is irrelevant to our comment. The traffic analysis should be comprehensive in assessing the impacts caused by all vehicular, pedestrian, and merging activities in the determination of the impact of the convention center activities. Based on an adequate assessment of these impacts, a determination can be made as to whether the Kalakaua Bridge requires widening.
- **Kapiolani Boulevard Ewa of Atkinson Drive:** Your response has not adequately addressed our comment. Your analysis should consider the intersection signal phasing and signal timing to accommodate the predicted 2005 vehicular and pedestrian volumes for the intersection.

- Atkinson Drive: Your response has not addressed our comment. No bus berths will be allowed on Atkinson Drive unless your traffic analysis can sufficiently demonstrate that there will be no impact from the merging bus activity.
- Kahakai Drive: Your response has not adequately addressed our comment. Pavement and sidewalk width requirements are to conform to City standards.
- Signalized Intersection at Atkinson/Kahakai: -Your response does not adequately address our comment. We anticipate a problem with vehicles on Atkinson Drive turning left into Kahakai Street queuing into and restricting Kapiolani Boulevard because of the short left-turn storage lane, and the heavy pedestrian movement crossing Atkinson at Kahakai Drive. To evaluate the traffic impacts in this area, please provide a plan of the intersection traffic controls, signal phasing, signal timing, and predicted vehicle and pedestrian volumes for the intersection of Atkinson Drive and Kahakai Drive. This information is essential in determining the level of service as a result of the convention center traffic and may, in fact, result in this intersection becoming a critical intersection in the analysis.

5. Worst Case Scenario

- The possible use of off-site parking facilities, such as the Neal Blaisdell Center and the University of Hawaii, as part of an overall traffic management plan is a positive step in handling overflow parking. We recognize that negotiating such agreements may take time. Therefore, the Final EIS should give assurances that development of the traffic management plan will be initiated prior to completion of the convention center.

6. Existing Conditions

- The response has not addressed our comment. We are questioning the validity of the "typical weekday traffic volumes" reflected in tabular format. The City's 1995 data for the Waikiki Regional Traffic Impact Plan does not provide this data.

7. Number of Analyzed Intersections

- The response has not addressed our comment. The comment indicated that the TIAR did not have all intersections analyzed for all four different time

periods. The 2005 analysis should provide an analysis for all 15 intersections for each of the four different time periods.

8. Land Use and Socio-Economic Data

- The Planning Department met with the project's consultants on May 18, 1995 to discuss the revised land use and socio-economic data. This information should be incorporated into the convention center's Final EIS.

9. Reversible Flow Ramp: No comment

10. Visitor Travel Mode

- The response has not adequately addressed our comment. The pedestrian volumes alighting from TheBus have not been provided in the TIAR. The number of pedestrians identified in the TIAR crossing Kalakaua at Ala Wai Boulevard is 280. We assume that this number is partially attributable from the 35% walk mode and not totally from TheBus patrons. The TIAR should provide the data to reflect the appropriate pedestrian volumes from the 642 bus patrons alighting TheBus as well as those walking from Waikiki hotels. Additionally, this number is inconsistent with the number of bus riders in Item 24.
- The TIAR should also provide the expected volume of pedestrians alighting from TheBus who will be crossing the Kalakaua/Kapiolani intersection, and what would be the impact to the intersection level of service.
- The TIAR reflects that there are vehicles exiting the parking garage onto Kalakaua during the peak hours. This is inconsistent with the response.
- The TIAR has not provided the appropriate analysis to determine that no additional mitigation measures are needed to accommodate the pedestrian volumes. No improvements to the sidewalks on the Kalakaua Bridge are proposed. The pedestrian analysis should consider the safety issue with the volume of pedestrians crossing the bridge, particularly in situations where there is reverse-flow pedestrian movements.

11. Walk Trips

- Our comments relating to the justification of the assumptions regarding the number of conventioners walking are the same as that indicated in Item 3 above.
- Our comment in Item 10 above relating to the 642 pedestrians taking TheBus to the convention center is applicable. It appears that the analysis has not taken this additional pedestrian volume into consideration.

12. Project Impacts for Kalakaua/Ala Wai and Ala Moana/Atkinson

- We will be reviewing the impact of the additional 2005 forecasts at these intersections.

13. Project Impacts to Kalakaua/Ala Wai

- Your response has not adequately addressed our comments on this issue. Our comments relating to merging buses and vehicles into the through lanes on Kalakaua in Item 4 above are applicable.

14. Project Impacts to Ala Moana/Atkinson

- The increased volume of traffic at this intersection has resulted in a significant impact, and some mitigation is required. The V/C ratio will be even greater for the 2005 analysis.
- If the State DOT has plans for the improvement of this intersection, there apparently exists a need. The TIAR should identify this improvement and analyze if this will mitigate the impact caused by the convention center traffic.

15. Travel Mode Split for 14,000 Conventioneers

- Our comments provided in Item 3 above are applicable. The assumptions should be verified, and once verified should be used consistently throughout the analysis. It appears that the same assumptions may not have been used consistently because an impact to the pedestrian facilities would have resulted, requiring mitigation measures.
- What were the sizes of the Miami conventions for which the comment was made?

16. Trip Generation Assumptions for the 14,000 Conventioneers

- Our comments provided in Item 3 above are applicable.
- The purpose and parameters of the travel mode analysis conducted at the Honolulu International Airport should be provided if it is to be used as a basis for establishing the mode split for taxis.

17. Walk Mode Split for 14,000 Conventioneers

- Our comments provided in Item 3 above are applicable.
- If a 35% walk mode split is to be used with the 14,000 conventioneers, the increase of pedestrians must be factored in the analysis of the intersection operation and the adequacy of the existing pedestrian facilities.

18. Project Impacts for Atkinson/Kahakai/Kona Intersection

- Our comment provided in Item 4 above requesting information for the traffic signal proposed for the Atkinson/Kahakai intersection is applicable for this issue. The signal phasing and timing at the Kapiolani/Atkinson intersection is also requested for our evaluation.

19. Ala Moana Park Drive

- We have no comment to your response, except that this was identified in your TIAR as a possible solution to mitigate the impact at the Ala Moana/Atkinson intersection. It appears that there will be a significant impact at this intersection, particularly in view of the 2005 forecasts. Our comments should be reviewed in consideration of including this option as a mitigation measure.

20. Evening Post-Commuter 3,000 Person Event

- Your response does not adequately address our comment. Our comments reflected in Item 3 above relating to the use of justified assumptions consistently in the analysis are applicable to this issue.
- Your response does not make any sense why the local participation would be so much higher than the 5 percent that was included in your assumption.

21. Traffic Impact Analysis of All-Local Event

- Our comments in Item 5 above relating to the alternative parking at Blaisdell and the UH is applicable to this issue. Although we do not expect the convention center to assess the traffic impacts of each different scenario, since these two particular locations have been specifically identified as possible off-site parking facilities, the EIS should address the impacts resulting from the vehicular access and the shuttle bus traffic to and from these sites.

22. Parking Alternatives

- As a clarification, our comment requests that arrangements with the parking managers for the use of their parking facilities should be established prior to the opening of the center, and not just prior to each major event.
- Your response has not adequately addressed our comments. Regarding the prior convention center complex proposal, the convention center indicates that 815 of the 3,030 total planned parking stalls were specifically designated for that project's convention center facility. Other uses included in that original proposal were office, condominium and hotel towers. The convention center then states that the 800 parking stalls planned for the current project is deemed adequate for the facility. The implication is that 800 stalls were considered sufficient for the originally proposed facility, and therefore should satisfy the needs of the current stand-alone project. The original proposal contained 216,000 square feet of convention center floor area, exclusive of support and service areas. In contrast, the current project contains over 828,000 square feet of convention center floor area, also exclusive of support and service areas. Since this is nearly four times the floor area devoted to convention activity, it is reasonable to anticipate increased facility usage and attendant demand for parking. Additionally, the former proposal incorporated the then-planned rapid transit alignment and a rapid transit station on-site, which reduced the need for convention center facility parking. Since simple scheduling conflicts may preclude the use of existing facilities to accommodate overflow parking from the convention center, we continue to strongly recommend that alternative locations be secured to provide additional parking stalls for the facility.

23. Trucks and Deliveries: No comment

24. Public Transportation

- The 851 and 266 visitors estimated to ride public transit during the morning and afternoon peak hours, respectively, is inconsistent with the 642 reflected in Item 10 of the responses.
- The response reflects that the existing Waikiki buses could not accommodate the additional bus patrons, and proposes to have additional shuttle bus service. The EIS must identify the impacts of the additional bus volume in the analysis.

25. Shuttle Bus Operation

- The S.E.A.T. planners must consider all parameters impacting the egress of shuttle buses and taxis onto Kapiolani Boulevard when conducting their analysis. A full assessment of the operation of the Kapiolani/Kalakaua intersection signal phasing, signal timing, vehicular and pedestrian volumes, merging activities, and conventioners crossing the entry drive to get to the lobby must be included in the analysis.

26. Pedestrian Access

- Our comments with regards to providing the appropriate pedestrian analysis indicated in Items 4, 10 and 11 are applicable to this item. The analysis should include the 2005 forecasts, and should more realistically represent the impact to pedestrian facilities.
- If the improved pedestrian facilities options are included in the Final EIS, the EIS should provide a more in-depth discussion of them.
- Integration of ADA requirements will be required for all pedestrian improvements.

27. One-Way Street Couplet: No comment

28. Drop Off/Pick Up at Main Entry

- In the proposed entry drive configuration, passengers arriving or leaving via taxis will need to cross the entry drive to access the lobby. The response comment of potential safety concerns resulting from passengers crossing the entry drive to access the lobby in a counterclockwise traffic circulation pattern is inconsistent with the current drop off/pick up situation.

29. Proposed Traffic Patterns and Effect on Vehicular Routes

- The response has not adequately addressed our comment regarding the analysis of routes which shuttle buses and taxis will be taking from Waikiki hotels, nor has it addressed their traffic impacts on Ala Wai Boulevard, Ala Moana Boulevard, and the mauka-makai streets indicated in our comments.

30. People Mover System

- The response has not adequately addressed our comment regarding the accommodation of people mover vehicles on-site.

31. Peripheral Parking: No comment

32. NETSIM Program: No comment

The following comments reflect urban design concerns we have:

- **Historic considerations:** Per the Department of Land and Natural Resources, the convention center will not be able to encroach on the banks of the Ala Wai Canal.
- **Encroachment on Private Property:** The City and County owns and manages the banks of the Ala Wai Canal.
- **Redesign of the Ala Wai Facade:** The removal of the 25 ft. encroachment will result in redesign. This will create a massive flat facade or wall along the promenade. The impact of such a massive flat facade should be softened with landscaping and/or art to provide for better integration into the surrounding area and resort/residential community. The City wishes to be involved in the design review of the redesign effort.
- **What are the Convention Center Authority's (CCA's) intentions regarding community as well as pedestrian improvements along the promenade?** Originally, support was offered by the CCA to help design and improve the abutting promenade. The promenade will still have to provide pedestrian improvements to accommodate both walking conventioners as well as local users.

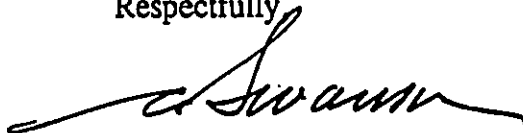
Convention Center Authority
June 1, 1995
Page 12

- The Waikiki side of the Ala Wai Canal directly across from the convention center will also need pedestrian improvements; not only for walking conventioners, but also for conventioners who will be dropped off on the Waikiki side of the Kalakaua Bridge, resulting in the need to construct additional pedestrian improvements, curb cuts, bays, etc.

Thank you for providing us with this opportunity to comment on the May 2, 1995 draft response. As stated before, the preparation of the revised TIAR will surely change these responses. Your efforts to keep us informed of the additional analyses that are being done and their results will ensure that our concerns are addressed satisfactorily.

If there are any questions, please contact Marvin Char of my staff at 527-5885.

Respectfully

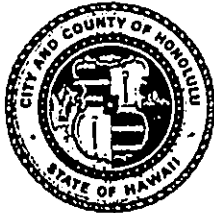


CHARLES O. SWANSON
Director

cc: Office of Environmental Quality Control
Wilson Okamoto & Associates, Inc.
Honorable Jeremy Harris, Mayor
Mr. Ben Lee, Managing Director's Office
Department of Land Utilization
Planning Department
Office of Waikiki Development
Honolulu Public Transit Authority
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JEREMY HARRIS
MAYOR

CHARLES O. SWANSON
DIRECTOR

MC-00109

June 28, 1995

Wilson Okamoto & Associates, Inc.
1907 South Beretania Street
Honolulu, Hawaii 96826

RECEIVED
JUN 29 1995

Attention: Earl Matsukawa

Dear Mr. Matsukawa:

WILSON OKAMOTO & ASSOCIATES

Subject: Hawai'i Convention Center
2005 Traffic Analysis

We have completed our preliminary review of the Traffic Impact Analysis Report for the Year 2005 traffic conditions and wish to offer our preliminary comments for your review in preparation for our meeting on June 30, 1995, at 10:00 a.m., in the Planning Department conference room, 650 South King Street, 8th floor. As a general note, our specific comments and requests for additional information and data indicated in our March 21, 1995 and June 1, 1995 letters are still applicable. In consideration of the current results of the traffic study being conducted by Kaku Associates for the Waikiki Regional Traffic Impact Plan, we have the following comments with regards to the 2005 traffic analysis conducted by Parsons Engineering Science, Inc.

- Introduction (page 3) - Change "busses" to "shuttle busses".
- Levels-of-service (LOS) calculations (page 16) - The LOS calculations for some of the study intersections are different from the results of the Waikiki Regional Traffic Impact Study under existing conditions. We would like to review the LOS worksheets to make sure the resulting LOS are consistent since the calculations are based on the same set of traffic data.
- Trip generation for cumulative projects (page 21) - The TIAR has identified a list of cumulative projects that would occur by the Year 2005. The TIAR should document the actual trip generation estimates for the cumulative projects that are assumed to be in the background traffic in Year 2005.


- Trip generation assumptions (page 25) - The mode split assumptions of 5% auto usage remains very optimistic. In addition, the walk percents by distance from hotels which leads to the overall 35% walk mode split appears to be high. It may be more realistic and logical to assume a higher auto usage initially for the conventioners and then reduce the auto mode split by using travel demand management strategies as a mitigation.
- Mode split assumptions (page 25) - The mode split assumptions for visitors under the 10,000 person scenario with inclement weather added up to be over 100%.
- Project trip generation (page 27) - In the TIAR conducted in January 1995, the project trip generation included trips generated by vendors and delivery trucks. These trips are not accounted for in the current TIAR.
- Trip generation comparisons (page 28) - Backup data should be provided in an appendix to document how the trip generation rates for the various convention centers are derived. The rates based on our calculations are different from those listed in Table 9.
- Trip distribution pattern for Convention Center area (page 31) - There should be a distribution for the residents/employees as well as one for the non-residents (visitors). The general trip distribution pattern percentages provided in the attachment would be reflective of the resident/employee travel, and are based on the travel demand model for the Waikiki Regional Traffic Impact Plan study. The model has indicated that traffic would arrive at the convention center area based on the following patterns:
 - 35% from westbound Kapiolani Boulevard
 - 25% from eastbound Kapiolani Boulevard
 - 10% from westbound Ala Moana Boulevard
 - 5% from westbound Kona Street
 - 6% from southbound Kalakaua Boulevard
 - 4% from southbound McCully Street
 - 15% from within Waikiki
- Trip distribution/assignment (page 32) - The trip assignment in the TIAR implied that of the 195 inbound resident and employee trips in the morning peak hour, only 54% would be generated from the area outside of Waikiki. The remaining 46% of all resident and employee trips would be generated from the area inside of Waikiki. Since the trip assignment for the morning peak hour is based on the trip distribution pattern on pages 30 and 31, this comment should apply to all scenarios.

Wilson Okamoto & Associates, Inc.
June 28, 1995
Page 3

- Mitigation Measures (page 30) - It is our understanding that the widening of Kalakaua Avenue provides for a bus bay and not an additional lane. This should be clarified.
- Mitigation Measures (page 41) - Please clarify what is the mitigation measure to address the impact to Ala Wai Boulevard at Kalakaua Avenue.
- Remaining issue - Under the 14,000-person scenario, there would be approximately 110 shuttle buses serving the conventioners. This translates to an average headway of 30 seconds for the system. Additional operational details such as routes and loading points should be provided in the report for such an extensive shuttle bus system.

If there are any questions, please contact Marvin Char at 527-5885.

Respectfully,


for CHARLES O. SWANSON
Director

Attachment

cc: Mark Hastert
Alan Hayashi

06/28/95 08:17
AIR MAIL DIV

310 394 7663
: 6-22-85 ; 3:54PM ;

KAKU ASSOC. INC.
DEPT OF TRANS SVC

003/003

310 394 7663;#15/23

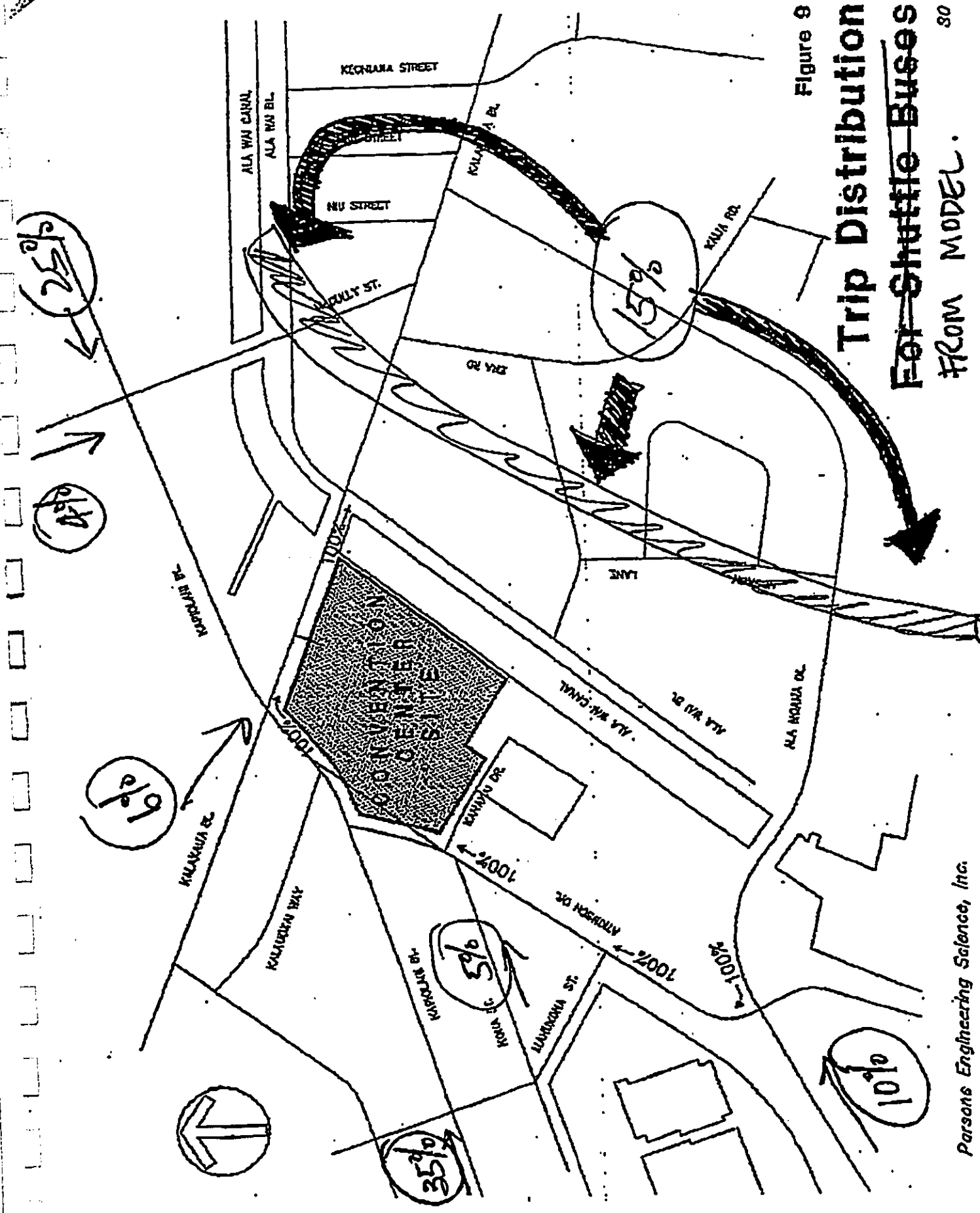
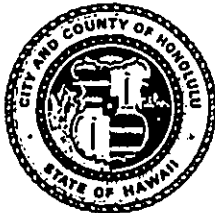


Figure 8
Trip Distribution
~~For Shuttle Buses~~
FROM MODEL. 80

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

PACIFIC PARK PLAZA
711 KAPIOLANI BOULEVARD, SUITE 1200
HONOLULU, HAWAII 96813



JEREMY HARRIS
MAYOR

CHARLES O. SWANSON
DIRECTOR

MC-00118

July 6, 1995

Wilson Okamoto & Associates, Inc.
1907 South Beretania Street
Honolulu, Hawaii 96826

RECEIVED
JUL 10 1995

Attention: Mr. Earl Matsukawa

Dear Mr. Matsukawa:

WILSON OKAMOTO & ASSOCIATES, INC.

Subject: Hawai'i Convention Center EIS

This is a follow-up to the discussion on June 30, 1995 regarding the Revised Traffic Impact Analysis Report. In the meeting, we had related that additional comments were provided subsequent to our letter of June 28, 1995. These comments are as follows:

1. A separate turn lane should be provided within the existing right-of-way (ROW) on Kapiolani Boulevard in the Koko Head direction turning right onto Atkinson Drive in the makai direction. This will provide a storage lane for vehicles attempting to turn left onto Kahakai Drive and minimize impacts to the through traffic of Kapiolani Boulevard.
2. Consideration should be made to provide an additional turn lane within the future road ROW on Kapiolani Boulevard in the Koko Head direction turning right onto Kalakaua Avenue in the makai direction. This would provide three through and two right turn lanes on this approach. Traffic presently queues along this section of Kapiolani Boulevard. The three through lanes will be consistent with the number of lanes prior to Atkinson Drive and after Kalakaua Avenue relieving a bottleneck on this section of Kapiolani Boulevard. Afternoon traffic presently queues on the existing right turn lane. The Convention Center is proposing a four-lane approach with two through lanes, a shared right turn lane and a separate right turn lane. From our past experience, motorists desiring to turn right into Waikiki will be reluctant to use this shared lane because of the presence of through traffic and buses. Right turning traffic will predominantly use the exclusive right turn lane only. Without the additional exclusive right turn lane, traffic exiting the Center's driveway will not be able to merge onto Kapiolani Boulevard to give preference to traffic exiting the driveway, traffic on Kapiolani Boulevard will queue. We understand that the street ROW will

be wide enough to accommodate this additional right turn lane, but the area is being reserved for landscaping. In the interests of the motoring public, the landscaping for the Center should be integrated within the Center's property and the roadway should be used to move vehicular traffic.


3. Because of the impact to the intersection of Kalakaua Avenue and Ala Wai Boulevard, mitigation is required. The widening of the Kalakaua Bridge to provide a right turn lane onto Ala Wai Boulevard should be considered as a mitigation measure. If the alternative mitigation improvement is to reconfigure the westbound approach on Ala Wai Boulevard at Kalakaua Avenue to provide two exclusive right turn lanes onto mauka bound Kalakaua from Ewa bound Ala Wai and an optional through/left turn lane, then the plans reflecting this proposal should be provided to the Department of Transportation Services for review and consideration.
4. Locations where parking will be temporarily and/or permanently prohibited need to be identified and coordinated with affected residents and businesses.
5. The procedure to temporarily restrict parking should be developed by the Convention Center Authority for use by the Center's manager.
6. A traffic plan to direct traffic during the Center's events needs to be submitted to the City. Item 5 above could be included in this plan.
7. The locations of permanent guide signs need to be identified.
8. A parking management plan needs to be prepared and outlying parking facilities identified.
9. Sidewalk improvements which are identified in the traffic study should be implemented as part of the Center's development.
10. The terms of the agreement which will require the manager of the Center to comply with the traffic and parking plan and limiting the number of local participants need to be addressed.
11. Atkinson Drive should be widened for its entire length, and the proposed bus berths at the intersection eliminated.
12. Truck turning templates should be used to determine the adequacy of the Kahakai Drive access.

Wilson Okamoto & Associates, Inc.
July 6, 1995
Page 3

13. The internal layout of the parking garage should be provided to our department when it becomes available.
14. The residents on Kahakai Drive should still be contacted regarding the concerns raised on the proposed circulation pattern of the street.
15. Traffic exiting the Center during a night event needs to be addressed.

If you have any questions, please contact Marvin Char at 527-5885.

Respectfully,

for 
CHARLES O. SWANSON
Director

cc: Convention Center Authority
Helber, Hastert & Fee Planners
Planning Department
Office of Waikiki Development
Department of Land Utilization
Honolulu Public Transit Authority
Kaku Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Charles O. Swanson
Director
Department of Transportation Services
City & County of Honolulu
Pacific Park Plaza
711 Kapiolani Boulevard, Suite 1200
Honolulu, Hawaii 96813

Dear Mr. Swanson:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letters dated March 21, 1995 and June 1, 1995 commenting on the subject Draft EIS, and your letters dated June 28, 1995 and July 6, 1995 to Mr. Earl Matsukawa of Wilson Okamoto & Associates, Inc. commenting on your preliminary review of the Traffic Impact Analysis Report for 2005 traffic conditions. We offer the following responses in the respective order of your comments:

Letter dated March 21, 1995

The State Convention Center Authority (CCA) acknowledges that the City Department of Transportation Services (DTS) has a justifiable concern regarding the State's role in addressing traffic impacts associated with the development of the convention center and its relationship with Waikiki hotels. Improvements to the roadway systems in the Waikiki area have not kept up with the growing traffic and the convention center is proposed at one of the busiest intersections in the State.

Please be assured that the CCA is also very concerned about the traffic situation since the viability of the convention center is dependent upon transporting conventioners conveniently between the hotels and the center. In the context of the EIS, however, most of the debate has focused on distinguishing between traffic impacts associated with the convention center and those attributable to other causes.

In the larger picture, the CCA is committed to working with the City to insure that transportation service for the convention center does not deteriorate, regardless of how much

Mr. Charles O. Swanson
July 17, 1995
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the convention center contributes to this deterioration. Your concern may be in part due to the findings of the Economic and Fiscal Impact Assessment in the Draft EIS which noted that the City would bear the burden of providing police and fire protection, health and sanitation, and other critical government services to the new visitors and associated in-migrants for jobs that the convention center would attract. It also projected the costs of these services and indicated that the City will not benefit from property tax revenues at the convention center site because it is owned by the State. Moreover, the assessment showed that increased tax revenues generated by the convention center through the transient accommodations tax and income taxes from the visitor industry would accrue to the State and not the City. Thus, there appeared to be an inequity in the distribution of benefits and costs between the City and State.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of projected economic impact estimates, with two sets of assumptions establishing a "lower attendance and spending" scenario and a "higher attendance and spending" scenario including one based on a more conservative consideration of assumptions leading to the projection of economic impacts. One of the revisions in the assessment is the distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's share of the statewide TAT collection could range from \$7.3 to \$8.9 million in the revised 2008 projection. The County's net new revenue projection is also positive, ranging from \$3.6 to \$5.4 million per year in 2008.

We offer the following responses to your comments:

1. Analysis Year 1998 (Page i-2)

Based on comments received on the Draft EIS, including the City DTS, a projection of traffic conditions in the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic

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associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan. In addition to the intersections analyzed in the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR), the 2005 study also includes an analysis of additional intersections in the project vicinity. These additional intersections are those assessed in 1998 conditions to demonstrate that the significantly affected intersections have been considered in the EIS TIAR (these additional intersections are described in response no. 2 below). Although the analysis of traffic conditions in year 2005 reflects the convention center-related impacts, its primary intent is to demonstrate the conditions that result from the continued growth in traffic not directly associated with the convention center. Its implication will be that the City and State need to work cooperatively to prevent the deterioration of traffic conditions to the degree that it adversely affects the community as well as convention center operations.

With respect to assessing the traffic impacts of the convention center, however, we maintain that 1998 is the appropriate year. The consideration of "phases of action" is different from the achievement of stabilized operations at the convention center. The concept of phased action would be applicable if a project were to be developed in phases, with each phase of development generating additional impact. In contrast, the proposed convention center will be fully developed and capable of accommodating a full-capacity event at its opening (such as the Lions which are tentatively booked for the year 2000 and the American Dental Association which is a possible 1999 participant). Stabilized operation means that the frequency of events will reach stabilization, assuming that marketing, over time, will attract more convention events. The size of the full-capacity event will not change unless the center is physically expanded in the future. Such an expansion would need to be addressed in a supplemental EIS.

With respect to assessing convention center traffic, the size of the largest events is the key issue. In response to comments received on the Environmental Assessment for the

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convention center, including the City DTS, the Draft EIS TIAR conservatively assesses the impacts of the full-capacity 14,000 person event which is projected to occur about once in three years at stabilization. Inasmuch as this is such a rare event, traffic studies would not normally include such an analysis. The frequency of the events, however, does not affect the traffic analysis. In the traffic assessment, the impact of the largest event would be no different on a given day, whether it occurred rarely or frequently.

The 1998 analysis year was selected because this is when the convention center is scheduled to open and it is conservatively assumed that the full-capacity event would occur in that year. The opening year is important since this is the time when the traffic impacts of the convention center and the proposed mitigation measures are clearly defined.

Selecting an earlier analysis year would not account for the cumulative impacts of other on-going developments that would create the projected traffic condition in 1998. Thus, the 1998 analysis year includes a projected traffic growth rate of 1.5 percent per year, from the present, at the intersections analyzed. The traffic generated by the convention center is then added to assess the cumulative traffic impact. Consequently, the impact of the convention center is clearly defined. The effectiveness of mitigation measures in addressing convention center-related traffic can also be assessed.

Although 2005 traffic conditions have been analyzed, selecting a later analysis year (after 1998) would typically not be appropriate for assessing the impact of the convention center since the traffic associated with the convention center should at that point be considered part of the existing traffic condition in that year, including the permanent mitigation measures such as road widening and traffic signalization. Thus, any increase in traffic between the opening year and a later analysis year is not directly attributable to the convention center. In those intervening years, there would be more events at the convention center. However, the amount of convention center traffic associated with the largest events would not increase relative to those estimated for 1998. Other developments and general traffic growth would contribute to traffic increases in the area. These increases, which are not directly the result of the convention center, would also be more appropriately addressed through the Waikiki Regional

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Traffic Impact Plan being prepared by the City. We recognize, however, that the convention center has a vital interest in assuring that roadways and intersections serving it remain functional as long as it is in operation. Thus, the CCA is committed to working with the City in the long-term to achieve this end.

While growth of traffic beyond 1998 will not be a direct impact of the convention center, it could be reasoned that some of that future growth in traffic could be a cumulative impact of induced secondary growth by the convention center. As discussed in the social impact assessment, due to many uncertainties regarding the timing and character of development in the area, such induced development cannot be predicted, much less the traffic impacts associated with such development. To account for this, the 2005 traffic analysis includes the 0.7 percent per year traffic growth factor, plus considers a number of proposed or planned projects within the area (those of which specific development have been determined) which may be developed within that time frame.

The concept of the convention center mitigating the cumulative traffic impacts creates a dilemma. It is recognized that the developer for any proposed project is responsible to assess the traffic impacts and provide mitigation measures to reduce the impacts accordingly. However, if traffic mitigation for assumed "induced" hotel development is provided by the convention center, then any future developers of hotels would be relieved of such a burden at the time of rezoning. In this sense, the convention center could be viewed as materially promoting such development, and may contradict City policy. Instead, it should be a matter of the City, the CCA and future developers that will stand to gain economically to collectively work toward addressing potentially adverse traffic conditions.

2. Study Area (Pages i-3, 1-5)

Using the *Hawaii Convention Center Transportation Impact Assessment* prepared by Wilbur Smith Associates (WSA/TIA) as a basis, the study area for the EIS TIAR was established based upon the intersections anticipated to be most significantly impacted by convention center traffic. Since most significant traffic impacts of the convention center would be related to site access, the intersections immediately surrounding the

Mr. Charles O. Swanson
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project site were included in the traffic impact analysis. The intersection of Ala Moana Boulevard and Atkinson Drive was also included in the traffic impact analysis since it will be designated as a primary travel route between Waikiki hotels and the convention center. As demonstrated in the WSA/TIA, the intersections beyond our defined study area, such as the Kapiolani Boulevard/McCully Street and Ala Moana Boulevard/Kalia Road intersections, were not significantly impacted by convention center traffic. Therefore, it was concluded that the area of significant impacts would be confined to the TIAR study area.

Nevertheless, in response to comments received on the Draft EIS that additional intersections in the project vicinity should be analyzed for convention center traffic impacts, analyses have since been conducted for the following intersections: Kalakaua Avenue at McCully Street, Kalakaua Avenue at Ena Road, Kalakaua Avenue at Ala Moana Boulevard, Ala Moana Boulevard at Ena Road/Kalia Road, Ala Wai Boulevard at McCully Street, Kapiolani Boulevard at McCully Street, Makaloa Street at Kalakaua Avenue, Hobron Lane at Ala Moana Boulevard, Atkinson Drive at Mahukona Street, and Kapiolani Boulevard at Kaheka Street/Mahukona Street. The report on the 1998 conditions of these additional intersection analyses, which will be included in the Final EIS document, substantiates the selection of critical intersections initially analyzed, and indicates that the impacts on the other intersections are relatively insignificant.

We agree with your comment that an analysis of potential regional impacts should be conducted for the convention center. However, a far better forum to address this regional analysis (and avoid duplication of efforts) is the City's Waikiki Regional Traffic Impact Plan which is the appropriate study to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). As discussed in our meetings with your department, it was agreed that the City would incorporate the traffic data from the convention center TIAR into its regional study. Likewise, the State CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

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In response to your comment that the convention center development will have an additional impact to facilities and intersections in the surrounding area, and that additional traffic demand may result from the use of Kona Street, please be apprised that the volume of traffic anticipated to exit the convention center via Kona Street is not significant. For example, during the PM peak hour for the 14,000-person convention, 55 vehicles per hour are expected to use Kona Street. The convention center traffic using Kona Street is expected to subsequently dissipate at the entrances and exits of Ala Moana Center and at Keeaumoku Street and Piikoi Street. Also, vehicles bound for the convention center from Waikiki will be directed to travel via westbound Ala Moana Boulevard due to the left-turn restriction at Kalakaua Avenue onto Kapiolani Boulevard during the PM peak traffic period. Therefore, the convention center traffic is not expected to increase the left-turn demand from mauka-bound Kalakaua Avenue onto Makaloa Street. As previously indicated, our analysis of additional intersections includes the Kapiolani Boulevard/McCully Street, Atkinson Drive/Mahukona Street, and Kalakaua Avenue/Ala Moana Boulevard intersections. Regarding the additional left-turn demand at Kapiolani Boulevard at University Avenue, the relatively low volume of local resident traffic leaving the convention center eastbound is not expected to travel via University Avenue. Access routes to the H-1 freeway for local resident traffic would likely be via Kapiolani Boulevard/McCully Street to Dole Street and to the Alexander Street on-ramp for westbound motorists, and from Kapiolani Boulevard onto the Kapiolani interchange (east of University Avenue) for eastbound motorists.

As indicated above, the Final EIS will include additional analyses of convention center traffic impacts at specific intersections, including the intersections of Kalakaua Avenue at Ala Moana Boulevard and Atkinson Drive at Mahukona Street.

Regarding your comment that the TIAR needs to assess both vehicular and pedestrian trips to non-convention destinations such as those identified in your letter, it is noted that Oahu visitors already staying at Waikiki hotels generate vehicular and pedestrian traffic which currently impacts such non-convention center destinations. Given the number of hotel rooms in Waikiki, conventioners would essentially "replace" the non-convention visitors who would otherwise be staying in Waikiki. Likewise, conventioners visiting these non-convention destinations would essentially replace the Oahu

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visitors (non-conventioners) who would otherwise have visited these areas. Therefore, the vehicular and pedestrian trips generated by conventioners would not significantly differ from non-convention visitor trips to these destinations.

3. Travel Forecast Assumptions (Page i-5, 4-11 to 4-15)

The travel forecast assumptions and modal shares used in both the WSA/TIAR and EIS TIAR were developed pursuant to discussions with persons with extensive experience in convention center operations across the nation and those associated with major Waikiki hotels which host convention events. Specifically, information was obtained through discussions held with managers and others associated with the Los Angeles, San Diego, Miami, Moscone Center (San Francisco), Portland, and Sacramento convention centers. In addition, the information obtained was further supplemented and verified in consultation with the State Convention Center Authority's (CCA) technical evaluation board member on convention center operations and with the CCA's Marketing Director. Validation and justification for the travel forecast assumptions and travel mode percentages will be provided in the TIAR to be included in the Final EIS document.

According to the manager of the Hyatt Regency Waikiki, 80 percent of conventioners attending a national convention typically attend the morning sessions on a peak day. Also, about 40 to 50 percent of the conventioners attend the afternoon sessions. The other half tend to leave the session mid-day, either before, during, or soon after lunch. Throughout the afternoon, more conventioners tend to "trickle-out". Therefore, about 25 percent of conventioners are assumed to leave the facility during the PM peak hour. Also, local residents typically comprise 5 percent or less of the total convention attendance. The manager of the Hyatt Regency Waikiki noted that 10 percent local resident attendance is a very high proportion.

The 35 percent walk mode split for the 10,000-person convention is based upon the 15-minute walking distance established by the 1989 survey (modified to include the Hawaii Prince Hotel) which grouped the inventory of hotels and short-term rental condominium units by walking distance to the convention center site. The stated proportion (percentages) of conventioners that would walk to the convention center for the varying distances was established through discussions with

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Page 9

managers of various mainland convention centers and Waikiki hotels. In general, conventioners would most likely walk to destinations located within a 10-minute range. Persons associated with the Hilton Hawaiian Village Hotel and the Hyatt Regency Waikiki indicate that people would likely walk to destinations within a four- to five-block range or within a 10-minute range. The 100 percent assumed to walk within the 5-minute range are those conventioners staying at the Ala Moana Hotel which is located in close proximity to the convention center site. The proportion of conventioners assumed to walk between the 11 to 15-minute range and over 15-minute range are further reduced, respectively, based on the "reasonable" walking travel time established.

The 5 percent of Oahu visitor attendees assumed to use taxis to travel to the convention center are those who would likely be staying at outlying hotels within Waikiki which are not served by shuttle buses or are not located within close proximity to hotels that provide shuttle bus service, or those who would be carrying material or other items to the convention center. This percentage of Oahu visitor attendees assumed to use taxis is comparable with the results of a travel mode analysis conducted at the Honolulu International Airport wherein about 6 percent of Oahu visitors from overseas domestic destinations use a taxi.

The average of 2.3 attendees per vehicle is a typical occupancy rate for attending a social event. Surveys taken at the Portland, Los Angeles and Sacramento convention centers indicate that 2.1 to 2.5 persons per vehicle auto occupancy rates are achieved.

The visitor travel mode percentages were based upon discussions with various mainland convention center, and were further adapted to the conditions in Honolulu. As we previously indicated, justification for the travel forecast assumptions and travel mode percentages will be provided in the TIAR to be included in the Final EIS document.

The 70 percent of full-time convention center employees assumed to commute by automobile would be provided on-site parking. Although such on-site parking would be made available, the convention center operator has no control over where these employees park. In the event that the on-site employee parking spaces are needed by attendees for certain large events, the transportation coordinator of the convention

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center would pre-arrange (i.e., with nearby hotels) to have parking made available for these employees.

During a typical large convention, the setting-up/taking-down of exhibits, displays and equipment within the exhibition hall usually occurs during the one or two days prior to and following the event. It is expected that the major truck activity will occur during this time as truckloads of freight would be transporting the displays and equipment to the convention center. It is also noted that a variety of smaller delivery and service vehicles will be travelling to and from the convention center site throughout the day, both during move-in/move-out days and during convention events. As indicated in the TIAR, volume levels of these vehicles will likely approximate 5 to 10 vehicles per hour.

4. Proposed Roadway Improvements and Operational Mitigating Actions for Convention Center Traffic (Pages i-29 to i-31, 4-7 to 4-10, 4-20 to 4-28)

Kapiolani and Kalakaua: We acknowledge your comment that the widening of roadway facilities on Kapiolani Boulevard and Kalakaua Avenue appear to facilitate the vehicular ingress and egress to the convention center.

Merging Activities on Kapiolani Boulevard:

The EIS TIAR indicates that the volume of vehicular traffic exiting the lobby entry drive is greatest during the AM peak hour (308 vehicles during a 14,000-person convention) when the volume of eastbound traffic on Kapiolani Boulevard is relatively low. With these conditions, queuing as a result of merging activities is not expected to occur. During the PM peak hour, the volume of vehicular traffic exiting the lobby entry drive is anticipated to be less than half of that exiting during the AM peak hour (152 vehicles). The proposed lane widening on Kapiolani Boulevard increases the eastbound capacity between Atkinson Drive and Kalakaua Avenue from three lanes to four lanes. Furthermore, the EIS TIAR's loading analysis of shuttle buses exiting the lobby area during the PM peak hour reflects the additional delay resulting from the potential merging/queuing actions of traffic on eastbound Kapiolani Boulevard. Under congested conditions when traffic in the curb lane of Kapiolani Boulevard queues back to the lobby exit driveway, shuttle buses and taxis are expected to merge one-on-one into Kapiolani Boulevard traffic. Motorists

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on eastbound Kapiolani Boulevard would be able to turn makaibound onto Kalakaua Avenue from the converted, as well as the added right-turn-only lane.

Merging Activities on Kalakaua Avenue:

Traffic turning makaibound from the curb lane on eastbound Kapiolani Boulevard onto Kalakaua Avenue would be channelized into the third (from centerline) through lane of Kalakaua Avenue (see Exhibit A). The planned channelization would encourage through traffic on Kalakaua Avenue to avoid using the added fourth curb lane, and thus would not result in merging activities at the Kalakaua Avenue bridge. Motorists travelling to the convention center would be able to enter the fourth curb lane to access the Center's parking garage. The only vehicular merging activities would occur at the end of an event when motorists would exit the convention center garage via the Kalakaua Avenue driveway. The convention center's parking garage ramp on Kalakaua Avenue, which is reversible, would normally function as an inbound ramp. However, the ramp flow would reverse to the outbound direction when extra exiting capacity is required at the conclusion of a large event. During the PM peak hour of the 10,000-person event, 52 vehicles exiting the parking garage, plus the 10 City buses at the proposed bus stop, would utilize the fourth curb lane of Kalakaua Avenue. The combined 62 vehicles would be expected to merge one-on-one with through traffic on Kalakaua Avenue at the Ala Wai Canal Bridge.

The proposed City bus bay for the existing Route 2 Waikiki-bound buses is planned to be located within the widened portion of Kalakaua Avenue fronting the convention center site (between the Center's parking garage driveway and the Ala Wai Promenade). Buses travelling makaibound on Kalakaua Avenue would be able to enter the fourth curb lane to approach this bus stop. In addition, curb space of about 50 feet for the bus bay and 50 feet for the end taper will be provided which will allow TheBus to service ADA passengers. As indicated in the previous paragraph, the merging action with buses leaving this bus stop will be minimal due to the planned channelization from eastbound Kapiolani Boulevard onto makaibound Kalakaua Avenue. Based on projected demands, the average queue on makaibound Kalakaua Avenue may occasionally extend beyond the proposed City bus stop fronting the convention center site.

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Egress of Shuttle Bus Loading Area:

The shuttle bus loading analysis during the PM peak hour accounts for the heavy traffic conditions on eastbound Kapiolani Boulevard, such as traffic queuing from the Kalakaua Avenue intersection to the main entry driveway. The shuttle bus departures would be directly affected by the traffic signal at the intersection of Kapiolani Boulevard at Kalakaua Avenue. The shuttle buses would primarily depart the main entry drive area and merge into the curb lane of eastbound Kapiolani Boulevard during the green phase at the intersection. The delay in shuttle bus departures would affect the dwell times. The shuttle bus berth analysis for the PM peak hour reflects the effect of the queues at Kapiolani Boulevard/Kalakaua Avenue intersection on shuttle bus dwell times. Also, as previously indicated, under congested conditions when traffic in the curb lane of Kapiolani Boulevard queues back to the lobby exit driveway, shuttle buses and taxis are expected to merge one-on-one into Kapiolani Boulevard traffic. During the AM peak hour, the relatively low traffic demand on eastbound Kapiolani Boulevard is not expected to significantly delay the exiting of vehicles from the main entry driveway.

Kalakaua Bridge Widening:

The EIS TIAR analysis at the intersection of Kalakaua Avenue at Ala Wai Boulevard demonstrates that convention center-generated traffic does not require widening of the Kalakaua Bridge to provide an additional through lane into Waikiki. The analysis of this intersection accounts for the projected pedestrian crossings, as well as vehicular traffic demand.

Kapiolani Boulevard (Eastbound) Ewa of Atkinson Drive:

The convention center traffic would impact the right-turn movement from Kapiolani Boulevard onto Atkinson Drive during the AM peak hour in the off-peak traffic direction. The TIAR capacity analysis demonstrates that the convention center traffic in the AM peak hour does not significantly affect the volume-to-capacity ratio. During the PM peak hour, the analysis shows that convention center traffic would minimally impact the right-turn movement from Kapiolani Boulevard onto Atkinson Drive due to the relatively low traffic volume of the Center. Although an exclusive right-turn lane from Kapiolani Boulevard onto Atkinson Drive during the respective 3,000-

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person and 1,800-person all-local events on a Friday evening would improve the overall traffic operation at this intersection, the TIAR proposes operational mitigation measures to improve the convention center traffic impacts. The proposed parking restriction on Kapiolani Boulevard would mitigate the convention center traffic impacts. If deemed necessary, the proposed westbound contra-flow coning would further improve the operation of the intersection. Therefore, provision of an exclusive right-turn lane on eastbound Kapiolani Boulevard onto Atkinson Drive is not necessary to mitigate convention center traffic impacts.

Atkinson Drive: The TIAR analysis indicates that during the AM and PM peak hours, the two bus berths on Atkinson Drive fronting the project site would not be utilized, except for the very large convention events. The planned widening of Kapiolani Boulevard fronting the project site will provide for three eastbound through lanes, resulting in more efficient lane utilization on Atkinson Drive and improved operation of the Kapiolani Boulevard/Atkinson Drive intersection. Further improvements, such as elimination of the two bus berths on Atkinson Drive in lieu of an additional through traffic lane as suggested in your letter, are not necessary to mitigate the traffic impacts of the convention center.

Kahakai Drive: The widening of Kahakai Drive will be designed to provide adequate truck turning movements to ensure accommodation of larger vehicles. Further, the low operating speeds of vehicles travelling on Kahakai Drive will be conducive to the proposed street design.

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead, landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock, and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive by the Atkinson Plaza condominium, and most residents in

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the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City DTS. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Kahakai Drive Loop Street Egress:

In response to comments received on the Draft EIS, further analysis was conducted to assess the impact of convention center vehicles to motorists egressing onto Kahakai Drive from the internal loop street. This analysis will be included in the TIAR which will be appended to the Final EIS document. The capacity analysis for the intersection of Kahakai Drive and the internal loop street is analyzed as a four-legged unsignalized intersection, with the loop street and the convention center truck access legs of the intersection yielding the right-of-way (see Exhibit B). At this intersection, Kahakai Drive becomes one-way inbound from Atkinson Drive. Traffic exiting the internal loop street would yield the right-of-way to traffic bound for the convention center parking garage and truck dock area, and traffic travelling down the one-way street to the residential area. The analysis demonstrates that traffic exiting the internal loop street would operate at LOS B during the AM peak hour during a 14,000-person convention event. This compares with traffic exiting the internal loop street operating at LOS A during the AM peak hour without the convention center. During the PM peak hour (14,000-person event), traffic exiting the internal loop street would operate at LOS A during both with and without the convention center since the inbound traffic volumes on Kahakai Drive are minimal. Both LOS A and B represent very acceptable conditions (no delay or short delays). Furthermore, traffic exiting the internal loop street would not conflict with the vehicles egressing the

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convention center parking garage since the Center's exit ramp is located closer to Atkinson Drive.

We would like to clarify your comment which indicates that motorists egressing onto Kahakai Drive from the internal loop street will be crossing three to four lanes of heavy traffic in the AM and PM peak periods without the benefit of a traffic signal. Traffic egressing the internal loop street onto Kahakai Drive would actually be crossing only up to two inbound lanes (see Exhibit B). Furthermore, during periods in which parking is allowed on the makai side of Kahakai Drive, traffic egressing the internal loop street would cross only one inbound lane on Kahakai Drive, a situation which presently occurs. Although the internal loop street egress operation does not require mitigation measures, we would like to point out that consideration to reversing the circulation of the loop street would likely result in the elimination of about two legal on-street parking spaces on the loop portion near Kahakai Drive to provide for adequate emergency vehicle access. Also, motorists traveling Waikiki-bound on Kahakai Drive who do not intend to access the convention center would be unable to turn around should they inadvertently bypass the loop street. They would be forced to enter the convention center parking garage, unless a turnaround area was provided outside of the Center.

Signalized Intersection at Atkinson/Kahakai: The capacity analysis for the signalized intersection of Atkinson Drive and Kahakai Drive includes the projected pedestrian volumes from the Ala Moana Hotel.

To mitigate the queuing in the left-turn lane on Atkinson Drive at Kahakai Drive, the EIS TIAR recommends that the proposed traffic signal at this intersection be coordinated with the traffic signal at the Kapiolani Boulevard/Atkinson Drive intersection.

As indicated in our response no. 2, the analysis of the signalized intersection of Atkinson Drive at Mahukona Street has been conducted. The results of the analysis will be included in the Final EIS document.

The EIS TIAR indicates that the recommended mitigation of the westbound contra-flow coning operation on Kapiolani Boulevard during the Friday evening post-commuter peak period for the 3,000-person event and 1,800-person all-local event would be

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implemented immediately after removal of the City's PM peak period eastbound contra-flow coning operation.

As indicated in the EIS TIAR, the proposed coning operation on makaibound Atkinson Drive during the AM peak period would improve the makaibound through movement. During the AM peak hour, the analysis of the intersection of Atkinson Drive and Kahakai Drive indicates that the intersection would still operate at LOS C conditions without the proposed coning. The coning operation is recommended to prevent potential queuing on makaibound Atkinson Drive back to Kapiolani Boulevard from occurring. The coning activity will be the responsibility of the convention center's transportation coordinator, and a transportation management plan would be submitted to the City DTS for review.

Coning: A transportation management plan, which includes coning operations, temporary signing, temporary on-street parking restrictions, and responsibilities of traffic control personnel, will be developed by the convention center's transportation coordinator prior to the opening of the Center and will be coordinated with the City DTS. The location of the permanent guide signs will be considered during the project's design phase and submitted to the City DTS for review.

Parking Restrictions: The temporary and/or permanent removal of on-street parking resulting from the convention center will be coordinated with the affected businesses and residents. Regarding notification of temporary restriction of on-street parking during large daytime or evening events at the Center, such restrictions will be clearly indicated on signs which will be posted in advance of the respective events in coordination with the City DTS. Currently, there are no provisions to replace the permanent or temporary removal of on-street parking resulting from the convention center. The convention center's transportation coordinator will be responsible to obtain a street usage permit from the City DTS for temporary restriction of on-street parking during specific events. The permit application will specify the hours and days of the week that the restriction(s) will be in effect.

5. Worst Case Scenario (Page 1-4)

The analysis of the 14,000-person convention to represent the "worst-case" scenario was conducted in response to written

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comments made by the City DTS to the environmental assessment for the convention center. As indicated in the EIS TIAR, the State convention center's primary market is intended to be off-shore national and international conventions, trade shows, exhibitions, and meetings. The convention center is not intended to be a primary venue for local events, nor to compete with the Blaisdell Center or hotels that host smaller conventions in their ballroom facilities. It should be noted that on-going improvements to the Blaisdell Center were funded in the amount of \$13 million by the State specifically to better accommodate local tradeshows and other large events. The convention center could, however, supplement the existing local venues.

Should there be occurrences of simultaneous local events with a total attendance that exceeds the number of on-site parking stalls, however, the convention center's transportation coordinator could pursue one or more of the parking alternatives identified in the EIS TIAR. To the extent that event planners may require off-site parking for certain events (i.e., predominantly local attendance or all-local-attendee events), arrangements could be made by the transportation coordinator of the convention center to use existing outlying parking facilities that may be available during the event. The attendees would be required to park at the off-site facility and be transported by shuttle buses to and from the convention center. It is uncertain at this time as to which parking alternative(s) or existing outlying parking facilities would be used and the number of available parking stalls. However, such existing off-site parking facilities could include those at the Blaisdell Center, the University of Hawaii at Manoa campus, or other available parking facilities. Although there is no formal agreement to use these parking facilities at this time, it is expected that the convention center operator will develop standing arrangements and terms for use of identified off-site parking facilities on an as needed and as available basis. In general, however, impacts to the roadway facilities in the respective areas resulting from use of these existing off-site parking facilities are already occurring, and therefore, would not differ during convention center use. As indicated in our response no. 4, the convention center's transportation coordinator would be responsible to prepare a transportation management plan which would be coordinated with the City DTS.

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6. Existing Conditions (Page 2-5)

The typical weekday traffic volume data (page 2-5 of the Draft EIS TIAR) will be updated to the most recent available 24-hour traffic count data and included in the Final EIS TIAR.

7. Number of Analyzed Intersections (Pages 2-11 to 2-15 and Table 2-1)

The study area for each analyzed time period was developed separately based upon concerns raised by the City DTS. The study area for a Friday evening post-commuter event was based upon concerns of convention center traffic impacts at the "gateways to Waikiki" (i.e., Kalakaua Avenue at Kapiolani Boulevard and Ala Moana Boulevard at Atkinson Drive). Therefore, the study area for the Friday evening post-commuter event includes these two intersections, plus the project access at the intersections of Kapiolani Boulevard/Atkinson Drive and Atkinson Drive/Kahakai Drive. The study area for the mid-day (weekday) peak hour was determined so as to examine the effects of the absence of the AM and PM peak period contra-flow coning operations on Kapiolani Boulevard, and the turn restrictions at the Kapiolani Boulevard/Atkinson Drive and Kapiolani Boulevard/Kalakaua Avenue intersections. The project access at Atkinson Drive/Kahakai Drive was also included in the mid-day (weekday) peak hour analysis.

As indicated in response no. 2 above, the Final EIS document will include additional analyses of convention center traffic impacts at the following intersections: Kalakaua Avenue at McCully Street, Kalakaua Avenue at Ena Road, Kalakaua Avenue at Ala Moana Boulevard, Ala Moana Boulevard at Ena Road/Kalia Road, Ala Wai Boulevard at McCully Street, Kapiolani Boulevard at McCully Street, Atkinson Drive at Mahukona Street, Makaloa Street at Kalakaua Avenue, Hobron Lane at Ala Moana Boulevard, and Kapiolani Boulevard at Kaheka Street/Mahukona Street. As previously indicated, the analyses of additional intersections substantiates the selection of critical intersections initially analyzed, and indicates that the traffic impacts on the other intersections are relatively insignificant during the AM and PM peak hours.

8. Land Use and Socio-Economic Data (Page 3-1)

At the time that the 1998 TIAR was prepared for the Draft EIS, the travel forecast and land use assumptions developed by the

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Cambridge Systematics, Inc. 1993 study, which was used as the basis for estimating future growth in background traffic, was the most recent available travel forecast for the project vicinity. The 2005 traffic analysis conducted for the convention center project uses a traffic growth factor of 8 percent (from 1995 to 2005) which was derived in consultation with the City DTS. This traffic growth factor is consistent with the average growth of the socio-economic parameters used in the City's Waikiki Regional Traffic Impact Plan study.

9. Reversible Flow Ramp for Parking Access on Kalakaua Avenue (Page 4-5, Figure 4-2)

Your comments and suggestions regarding the internal layout of the convention center parking garage are well taken. We have forwarded your comments to the design/build team for their consideration.

10. Visitor Travel Mode by TheBus (Pages 4-13 to 4-14)

We would like to clarify that the estimated 10 percent of conventioners (Oahu visitors and local residents) assumed to use TheBus to the convention center during the analyzed AM peak hour will amount to about 642 conventioners for a 10,000-person convention, and not 1,000 conventioners as indicated in your comment. For a 10,000-person convention, the 10 percent of Oahu visitor and local resident attendees assumed to ride the shuttle bus (610 Oahu visitor and 32 local resident attendees) is based on the number of attendees assumed to arrive during the AM peak hour on a peak convention day. On a typical high-usage day, 80 percent of the registered conventioners (8,000 persons) are assumed to attend events at the convention center. Eighty (80) percent of the daily attendees (6,400 persons) would arrive during the AM peak hour. Of this, local residents comprise 5 percent of the daily attendees (320 persons), of which 10 percent are assumed to use TheBus (32 persons). The remaining 95 percent are Oahu visitor attendees (6,080 persons), of which 10 percent are assumed to ride TheBus (610 persons).

We also presume that you intended your comment to read "...The majority of these attendees will alight in the AM peak period at the Hard Rock Cafe,..." rather than the "...PM peak period..." as stated. The EIS TIAR addresses the concerns relating to the location of bus stops in the convention center area and recognizes that the closest bus stop for visitors

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using the Route 2 (maukabound on Kalakaua Avenue) is adjacent to the Hard Rock Cafe. The closest crosswalks, however, are located makai of Ala Wai Boulevard or mauka of Kapiolani Boulevard which may increase jaywalking and the attendant safety concerns. The EIS TIAR recommends that visitor conventioners travelling to the convention center should be instructed to disembark at the bus stop mauka of Kapiolani Boulevard (near the Century Center building) to encourage safe crossing. However, some visitor conventioners may opt to disembark at the bus stop at Ala Wai Boulevard (near the Waikiki Landmark), which would increase pedestrian traffic across the Kalakaua Avenue bridge. The EIS TIAR further acknowledges that this could worsen pedestrian conditions on the bridge sidewalks.

The traffic analysis of the intersection of Kalakaua Avenue and Ala Wai Boulevard includes the high volume of pedestrians crossing at this intersection. As indicated in our response no. 4, there are no significant vehicular merging activities on Kalakaua Avenue near the Ala Wai Canal bridge during the weekday peak traffic hours. The only vehicular merging activities would occur at the end of an event when motorists would exit the convention center garage via the Kalakaua Avenue driveway. The convention center's parking garage ramp on Kalakaua Avenue, which is reversible, would normally function as an inbound ramp. The Kalakaua ramp would also be inbound during the PM peak period for most small to mid-size events. Given the large 10,000- and 14,000-person convention sizes, the ramp was assumed to be reversed to accommodate the exiting traffic. Once operational, actual experience will provide a guide as to when the ramp is inbound or outbound. During the PM peak hour of the 10,000-person event, 52 vehicles exiting the parking garage, plus the 10 City buses at the proposed bus stop, would utilize the fourth curb lane of Kalakaua Avenue. The combined 62 vehicles would be expected to merge one-on-one with through traffic on Kalakaua Avenue at the Ala Wai Canal Bridge. Also, the EIS TIAR demonstrated that the anticipated level of pedestrian traffic attributed to the convention center would not require construction of a pedestrian bridge across the Ala Wai Canal.

11. Walk Trips (Page 4-13)

The stated proportion (percentages) of conventioners that would walk to the convention center for the varying distances was established through discussions with managers of various

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mainland convention centers and at Waikiki hotels. In general, conventioners would most likely walk to destinations located within a 10-minute range. Persons associated with the Hilton Hawaiian Village Hotel and the Hyatt Regency Waikiki indicate that people would likely walk to destinations within a four- to five- block range or within a 10-minute range. The 100 percent assumed to walk within the 5-minute range are those conventioners staying at the Ala Moana Hotel which is located in close proximity to the convention center site. The proportion of conventioners assumed to walk between the 11 to 15-minute range and over 15-minute range are further reduced, respectively, based on the "reasonable" walking travel time established.

As indicated in response no. 10. above, the number of conventioners assumed to use TheBus to the convention center during the AM peak hour is about 642 persons and not 1,000 persons as your comment indicates. The intersection analyses in the EIS TIAR include the estimated volume of pedestrians crossing at the affected intersections. The sidewalks approaching the convention center site have been analyzed under the projected pedestrian volumes. The sidewalks to be constructed in association with the convention center along its frontage would accommodate the cumulative pedestrian demands.

12. Project Impacts for Kalakaua/Ala Wai and Ala Moana/Atkinson (Page 4-24, Table 4-4)

Although the respective volume-to-capacity ratio for the intersections of Kalakaua Avenue/Ala Wai Boulevard and Ala Moana Boulevard/Atkinson Drive in year 1998 show a significant increase both with and without the 10,000-person convention, the capacity analyses indicate that both intersections have adequate capacity under the 10,000-person convention scenario.

The EIS TIAR does identify a mitigating action for the intersection of Ala Moana Boulevard/Atkinson Drive (page 4-27). The TIAR indicates that with the large volume of vehicles turning right onto Atkinson Drive, which would be increased with the convention center, it would be desirable to add a right-turn lane along the mauka side of Ala Moana Boulevard at Atkinson Drive. In recent discussions between the CCA and the State Department of Transportation (DOT), the DOT has indicated that they will further evaluate the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of

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its Ala Moana Boulevard improvement project. The decision by the State DOT to implement this improvement, however, is subject to the results of the City's Waikiki Regional Traffic Impact Plan which is anticipated for completion in August 1995. The CCA will participate in ongoing discussions with the State DOT regarding the Ala Moana Boulevard/Atkinson Drive intersection.

13. Project Impacts to Kalakāua/Ala Wai (Page 4-27)

The analysis of the Kalakaua Avenue and Ala Wai Boulevard intersection includes the anticipated number of pedestrian crossings, shuttle buses and taxis. Regarding the merging activities mauka of the intersection, traffic turning makaibound from the curb lane on eastbound Kapiolani Boulevard onto Kalakaua Avenue would be directed by lane marking into the third (from centerline) through lane of Kalakaua Avenue. The planned striping would encourage through traffic on Kalakaua Avenue to avoid using the fourth curb lane. Waikiki-bound traffic would travel in the existing three through lanes, and thus would not be merging at the Kalakaua Avenue bridge. Motorists travelling to the convention center would be able to weave into the added curb lane to access the Center's parking garage.

As indicated in response no. 4 above, the only vehicular merging activities mauka of the Kalakaua Avenue/Ala Wai Boulevard intersection would occur at the end of an event when motorists exit the convention center garage via the Kalakaua Avenue driveway. The convention center's parking garage ramp on Kalakaua Avenue, which is reversible, would normally function as an inbound ramp. However, the ramp flow would reverse to the outbound direction when extra exiting capacity is required at the conclusion of a large event. During the PM peak hour of the 10,000-person event, 52 vehicles exiting the parking garage, plus the 10 City buses at the proposed bus stop, would utilize the fourth curb lane of Kalakaua Avenue. The combined 62 vehicles would be expected to merge one-on-one with through traffic on Kalakaua Avenue at the Ala Wai Canal Bridge.

14. Project Impacts to Ala Moana/Atkinson (Page 4-28)

The EIS TIAR does include an analysis of the traffic impacts of the Ala Moana Boulevard/Atkinson Drive intersection without the right-turn lane improvement (pages 4-24 and 4-27). As

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indicated in our response no. 12, although the volume-to-capacity ratio for the Ala Moana Boulevard/Atkinson Drive intersection shows a significant increase with the 10,000-person convention, the capacity analysis indicates that the intersection has sufficient capacity under the 10,000-person convention scenario. Also as indicated in response no. 12 above, in recent discussions between the CCA and the State DOT, the DOT has indicated that they will further evaluate the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. The decision by the State DOT to implement this improvement, however, is subject to the results of the City's Waikiki Regional Traffic Impact Plan which is anticipated for completion in August 1995. The CCA will participate in ongoing discussions with the State DOT regarding the Ala Moana Boulevard/Atkinson Drive intersection.

Regarding your comment that the TIAR does not provide an analysis of the City's proposed one-way traffic conversion (ewa bound) on Ala Moana Park Drive for the critical peak hour periods, please be apprised that although the EIS TIAR acknowledges the proposed plan, it does not assume implementation of the proposed conversion of Ala Moana Park Drive to one-way circulation since it is only in the proposal stage at this time. Further, as implied by your comment no. 19, implementation of this project further appears to be uncertain at this time since Ala Moana Park is under consideration by the City as a potential peripheral parking site for Waikiki.

Regarding your comment that there will be a need to relieve the anticipated volume of convention center-related traffic on Ala Moana Boulevard, please be informed that the volume of convention center traffic would not justify the construction of a new vehicular bridge across the Ala Wai Canal. Also, in the vicinity of the convention center site, there does not appear to be any feasible alignment for an additional vehicular bridge across the Canal to alleviate convention center-related traffic on Ala Moana Boulevard. A future pedestrian bridge at Lipeepe Street could provide better access to the Center for walkers, but it would be subject to the historic sites review process due to its impact on the Ala Wai Canal. Although its Waikiki end could serve as a drop-off point for shuttle buses, the addition of these buses in the Hobron Lane residential area may not be well received.

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15. Travel Mode Split for 14,000 Conventioneers (Page 4-30)

The 70 percent of Oahu visitor attendees (14,000-person convention) assumed to ride shuttle buses is similar to the ratio achieved by mainland convention centers without adjacent hotel complexes. For example, according to the manager of the Miami Convention Center (where the concentration of Miami Beach hotels is located 3 to 4 miles from the site), 80 to 90 percent of attendees at a national convention typically use the continuous all-day shuttle bus system which operates between the Center and the hotels.

On the other hand, the 45 percent of Oahu visitor attendees (10,000-person convention) assumed to ride shuttle buses was derived based on allocation of the travel mode forecast to/from the convention center for visitors to Oahu. For the travel mode forecast, the number of Oahu visitor attendees walking was first estimated. The resulting 35 percent of Oahu visitor attendees estimated to walk was based on Hawaii's favorable climate conditions and the 15-minute walking distance established by the 1989 survey (modified to include the Hawaii Prince Hotel) which grouped the inventory of Waikiki hotels and short-term rental condominium units by walking distance to the convention center site. After allowance for usage of rental cars, taxis, and the public bus system, the remainder of Oahu visitors were assumed to use shuttle buses.

According to convention transportation planner S.E.A.T. Planners, Incorporated, their experience with convention centers nationwide indicates that you can achieve an average passenger load per shuttle bus approximating the capacity of the total number of buses required for an event. As indicated in the EIS TIAR, the largest available bus vehicle capacity provides the most cost-effective service. Based upon the current private bus fleets, the large tour coaches can accommodate a capacity of 49 or more seated passengers. There may be occasions, however, whereby some shuttle buses may operate at less than the seated capacity passenger loads. Likewise, other shuttle buses may accommodate standing passengers, which would result in an average load approximating the number of seats. It is noted that the local charter bus companies operate large coaches that range from 49 to 65 seats. The average number of seats per bus is estimated to approximate 54 for these large coaches.

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16. Trip Generation Assumptions for the 14,000 Conventioneers
(Pages 4-32 to 4-35 and Tables 4-5 through 4-7)

As indicated in response no. 3 above, the travel forecast assumptions and modal shares used in both the WSA/TIAR and EIS TIAR were developed pursuant to discussions held with managers and others associated with the Los Angeles, San Diego, Miami, Moscone Center (San Francisco), Portland, and Sacramento convention centers. This information was further supplemented and verified in consultation with the State Convention Center Authority's (CCA) technical evaluation board member on convention center operations and with the CCA's Marketing Director.

According to the manager of the Hyatt Regency Waikiki, 80 percent of conventioneers typically attend the morning sessions on a peak day at national conventions held at the hotel. Also, about 40 to 50 percent of the conventioneers attend the afternoon sessions. The other half tend to leave the session mid-day, either before, during, or soon after lunch. Throughout the afternoon, conventioneers tend to "trickle-out", therefore, about 25 percent are assumed to leave the facility during the PM peak hour.

The 5 percent of Oahu visitors assumed to use taxis to travel to the convention center are those who would likely be staying at outlying hotels within Waikiki which are not served by shuttle buses or are not located within close proximity to hotels that provide shuttle bus service, or those who would be carrying material or other items to the convention center. This percentage of Oahu visitor attendees assumed to use taxis is comparable with the results of a travel mode analysis conducted at the Honolulu International Airport wherein about 6 percent of Oahu visitors from domestic destinations use a taxi.

As indicated in response no. 15 above, the 70 percent shuttle bus ridership mode split for Oahu visitor attendees is similar to the ratio achieved by mainland convention centers without adjacent hotel complexes. The basis of comparison using the auto mode split for convention centers in Southern California as indicated in your comment is not an appropriate comparison to Hawaii's situation. Southern California has a much larger population base than Oahu, and therefore the local resident attendance who drive their own cars is likely to be

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proportionately higher, resulting in a higher auto modal split.

17. Walk Mode Split for 14,000 Conventioneers (Page 4-32)

The walk mode split would have some relationship to the size of the event, but is based on the acceptable walking time and the number of hotel rooms located within that walking distance. The reduction in the cumulative percentage of walk trips for the 14,000-person convention (10 percent) from the 10,000-person convention (35 percent) is intended to provide a more conservative basis for assessing a "worst-case" traffic situation. The cumulative reduction in walk trip percentage reflects reductions in walk trip assumptions for each of the walking distance zones from the convention center to Waikiki hotels.

The walk mode split for the 10,000-person convention is based upon the 15-minute walking distance established by the 1989 survey (modified to include the Hawaii Prince Hotel) which grouped the inventory of hotels and short-term rental condominium units by walking distance to the convention center site.

Under the 14,000-person convention, a more conservative analysis was conducted using the 10-minute walking distance to establish the walk mode split. As indicated in our response no. 11, conventioneers would most likely walk to destinations located within a 10-minute range.

18. Project Impacts for Atkinson/Kahakai/Kona Intersection (Page 4-40)

As under the 10,000-person convention, the capacity analysis for the signalized intersection of Atkinson Drive and Kahakai Drive for the 14,000-person convention includes the projected pedestrian volumes from the Ala Moana Hotel.

To mitigate the queuing in the left-turn lane on Atkinson Drive at Kahakai Drive, the EIS TIAR recommends that the proposed traffic signal at the Atkinson Drive/Kahakai Drive intersection be coordinated with the traffic signal at the Kapiolani Boulevard/Atkinson Drive intersection. For the 14,000-person convention, the signal coordination at these intersections becomes more critical in order to minimize the queuing.

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As indicated in response no. 2 above, the analysis of the signalized intersection of Atkinson Drive at Mahukona Street has been conducted. The results of the analysis will be included in the Final EIS document.

The recommended mitigation of contra-flow coning operation on Kapiolani Boulevard would be implemented immediately after removal of the City's PM peak period eastbound contra-flow coning operation.

As indicated in the EIS TIAR, the proposed coning operation on makaibound Atkinson Drive during the AM peak period would improve the makaibound through movement on Atkinson Drive. During the AM peak hour, the assessment of the intersection of Atkinson Drive and Kahakai Drive indicates that the intersection would still operate at LOS C conditions without the proposed coning. The coning operation is recommended to prevent potential queuing on makaibound Atkinson Drive back to Kapiolani Boulevard from occurring. We acknowledge that this coning activity will be the responsibility of the convention center's transportation coordinator, and that a transportation management plan for the coning operation would be reviewed with the City DTS.

19. Ala Moana Park Drive (Page 4-41)

We acknowledge your comment that Ala Moana Park is under consideration by the City as a potential peripheral parking site for Waikiki. We would like to clarify, however, that for the purpose of the EIS TIAR, we are not assuming implementation of the proposed conversion of Ala Moana Park Drive to one-way (ewa) circulation. To improve the overall intersection of Ala Moana Boulevard/Atkinson Drive/Ala Moana Park Drive, the preferred alternative is the widening of westbound Ala Moana Boulevard to provide an exclusive right-turn lane at Atkinson Drive as previously mentioned in response nos. 12. and 14. above.

The peripheral parking site under consideration at Ala Moana Park by the City is not included in the EIS traffic analysis since it is also only in the proposal stage at this time. We acknowledge your comment that future development of peripheral parking facilities may impact traffic as well as require reconsideration of the Ala Moana Regional Master Plan.

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20. Evening Post-Commuter 3,000 Person Event (Page 4-47)

The rationale for the number of local residents attending the Friday evening post-commuter 3,000-person event exceeding the total number of assumed local residents for the convention was to establish a more conservative assumption on local resident attendance in order to provide a high, conservative estimate of the traffic impacts. Local attendees may be more likely to attend an evening function, rather than the daily convention sessions due to potential conflicts with work schedules. Furthermore, most Oahu resident would likely be accompanied by a spouse or guest to an evening event.

21. Traffic Impact Analysis of All-Local Event (Page 4-53)

The analysis of the 1,800-person all-local Friday evening post-commuter event is based on the maximum size event which could be held at the convention center based on the number of on-site parking stalls available. As indicated in response no. 5 above, the convention center is not intended to be a primary venue for local events nor to compete with the Blaisdell Center or Waikiki hotels with ballroom facilities used to host smaller conventions. Large indoor local events will continue to be staged at the Blaisdell Center or at the various hotel ballrooms in Waikiki and elsewhere. The convention center could, however, supplement the existing local venues. Further, most of the "dark days" between events would be taken up by set-up or take-down activities for the major national/international conventions.

As indicated in response no. 5 above, should there be occurrences of simultaneous local events with a total attendance that exceeds the number of on-site parking stalls, the convention center's transportation coordinator could pursue one or more of the parking alternatives identified in the BIS TIAR. To the extent that event planners may require off-site parking for certain events (i.e., predominantly local attendance or all-local-attendee events), arrangements could be made by the transportation coordinator to use existing outlying parking facilities that may be available during the event. The attendees would be required to park at the off-site facility and be transported by shuttle buses to and from the convention center. Such off-site parking facilities could include those at the Blaisdell Center, the University of Hawaii at Manoa campus, or other available parking facilities. Although there is no formal agreement to use these parking

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facilities at this time, it is expected that the convention center operator will develop standing arrangements and terms for use of identified off-site parking facilities on an as needed and as available basis. In general, however, impacts to the roadway facilities in the respective areas resulting from use of these existing off-site parking facilities are already occurring, and therefore, would not differ during convention center use.

We emphasize that the EIS TIAR analyzes the traffic and transportation impacts of a range of scenarios which could reasonably occur at the convention center. It is not feasible or possible to address every conceivable situation or scenario at the EIS level of analysis. Upon operation of the convention center, the transportation coordinator of the Center would be responsible to prepare a transportation management plan, as deemed necessary, for various events. This plan, which could include contingencies to address unique conditions such as events at nearby venues like Ala Moana Center, would be coordinated with the City DTS.

The convention center traffic is not expected to significantly impact the major corridors into or out of Central Honolulu (i.e., Pali Highway to Kailua, Kalaniana'ole Highway to Hawaii Kai, Beretania Street to Kalihi, etc.) since the volumes of traffic distributed over these major corridors are not expected to be significant.

22. Parking Alternatives (Page 4-60)

We acknowledge your comment that because the City does not have zoning jurisdiction within the Convention Center Authority's established boundaries, the City Department of Land Utilization can not require that off-street parking for the convention center meet Land Use Ordinance (LUO) standards. As indicated in the EIS TIAR, the parking alternatives identified could become part of an overall transportation management plan by the convention center's transportation coordinator which would increase the number of available stalls or provide alternatives to parking at the convention center. Implementation of any one of the identified parking alternatives would be coordinated by the transportation coordinator as deemed appropriate for the respective events.

With respect to the prior convention center complex proposed at the project site by First Development, Inc., the off-site

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parking facilities proposed at the City Tow Yard site on Kapiolani Boulevard and the Veterans of Foreign War site on Kalakaua Avenue were included in the project to meet the total parking requirements under the City's LUO BMX-4 zoning designation (zoning designation used as the basis for the Honolulu Convention Center (HCC) complex). In addition to a convention center facility, the proposed HCC complex also included an office tower, a hotel tower, two condominium towers, and on-site parking within the former Aloha Motors property. Of the total approximately 3,030 on- and off-site parking stalls proposed for this project, 815 stalls were designated for the convention center facility. Further, the Honolulu Convention Center project is a separate project from the planned State Convention Center. We maintain that the 800 on-site parking stalls planned for the State Convention Center is deemed to be adequate for the facility.

A transportation management plan will be prepared to ensure maximum efficiency of the on-site parking. The transportation coordinator of the convention center will develop standing arrangements and terms for use of identified off-site parking facilities on an as needed and as available basis. The coordinator will work with the convention planner of the specific event in selecting an off-site parking facility and customizing a shuttle bus plan to transport attendees to and from the Center. The transportation management plan will identify the method and route which convention center attendees will be transported to and from the Center from the off-site parking facility.

23. Trucks and Deliveries (Pages 4-61 and 4-62)

The transportation coordinator of the convention center would be responsible to coordinate the scheduling of arrivals and departures of container/freight trucks delivering exhibit materials to and from the convention center. Such scheduling should minimize the number of trucks arriving and departing the convention center site during the morning and afternoon peak traffic periods. Upon operation of the convention center, a liaison for the Center would be identified, as appropriate, to ensure communication with respective government or utility agencies in the event problems are encountered.

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24. Public Transportation (Page 4-63)

For the 14,000-person event, the 851 and 266 Oahu visitors estimated to ride public transit during the AM and PM peak hours, respectively, are based on the 10 percent ridership assumed of the 8,512 and 2,660 Oahu visitors arriving and departing the convention center during the respective peak hours. Likewise, the 81 (45 local attendees plus 36 employees) and 54 (14 local attendees plus 36 employees) Oahu residents estimated to commute via public transit to and from the convention center during the respective AM and PM peak hours, are based on the 10 percent of Oahu residents and 30 percent of employees assumed to use TheBus during the respective peak hours.

The EIS TIAR indicates that the Oahu residents would be dispersed among buses on Routes 2, 8, 19, 20, and 47, as well as Ala Moana Center. Therefore, the impact of these Oahu residents to TheBus system would be insignificant. Due to the impact of the number of Oahu visitors on Route 2 of TheBus system, the EIS TIAR indicates that TheBus could not accommodate the additional riders without adding more bus capacity, either more vehicles or use of higher-capacity articulated buses. Accordingly, the EIS TIAR indicates that mid-size and large conventions should stress the use of special convention shuttle services, and that a convenient system of shuttle buses should be provided between the hotels and the convention center.

25. Shuttle Bus Operation (Pages 4-65 to 4-67)

As previously indicated, the assumptions and guidelines used in the shuttle bus operations analysis for the EIS TIAR were established in consultation with convention transportation planner S.E.A.T. Planners, Incorporated. Based on S.E.A.T. Planners' extensive experience with conventions nationwide, an average passenger load per shuttle bus approximating the average number of seats of the total number of buses required for an event is achievable. The contractor for the shuttle bus operations would secure a fixed number of bus vehicles for a specific event in advance of the event. Also, since the costs incurred by shuttle bus operators are attributed to labor or bus drivers, rather than the size of vehicles, it would be more cost-effective for the shuttle bus operator to obtain maximum passenger capacity than to conduct an operation with less than the capacity number of passengers. To

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compensate for the buses which may operate at less than the seated passenger loads, other shuttle buses may accommodate standing passengers. Also, the analyses is based on charter coaches with 49 seats per bus, which is the smallest of the large size coaches. Local charter buses range between 49 and 65 seats, with an average of approximately 54 seats. Thus, the actual seating capacity will likely be 10 percent or more than the number used in the TIAR analysis. In general, the livelihood of convention transportation consultants such as S.E.A.T. Planners is wholly dependent on successfully transporting conventioners between host hotels and convention centers in a timely and efficient manner. Likewise, the reputation of any convention center is also dependent on ensuring convenient and efficient transportation service to conventioners.

Due to the uncertainty as to which host hotels would be used and the number of conventioners staying at each hotel, additional operational details such as specific routes and loading points are unable to be determined at this time. These operational details will be made a part of the shuttle bus plan developed by the bus operator for each major event.

We acknowledge it is essential that the transportation management plan for convention center events involving host hotels in Waikiki should include working with these hotels to ensure sufficient on-site hotel areas for shuttle bus queuing. We concur that provision of such facilities will be crucial to prevent bottlenecks caused by buses idling or on- and off-loading on City streets. As indicated in the EIS TIAR, a convention planner will usually secure large blocks of rooms from nearby hotels which can easily be serviced by shuttle bus routes. Shuttle buses would not service small or non-host hotels since these facilities usually lack off-street loading areas. Upon operation of the convention center, we acknowledge that strict enforcement of the City prohibition against on-street loading, off-loading, and queuing will be necessary to ensure smooth traffic circulation in Waikiki.

26. Pedestrian Access (Page 4-67)

As indicated in the EIS TIAR, the relocation of the utility poles at each end of the Kalakaua bridge results in LOS C/D which is adequate based upon the more conservative 35 percent pedestrian walk mode assumption. The utility poles at each end of the Kalakaua bridge will be relocated in conjunction

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with the convention center project. Also, the typical City and County sidewalks on the approaches to the convention center should be adequate to handle the projected convention center pedestrian volume.

Although not required, the three other options to further improving pedestrian access as mentioned in the EIS TIAR (widening the existing Kalakaua Bridge; constructing a new pedestrian-only bridge paralleling the Kalakaua Bridge; and constructing a new pedestrian bridge near Lipeepee Street) were included in the study to identify potential means to further improve pedestrian access in the vicinity. However, these options are not intended to be mitigation for the convention center project nor a commitment to build them. Such options would each be pursued as separate actions and be subject to the historic sites review process and the provisions of Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) because it would affect historic properties, be built on public lands, and likely involve public funds.

We acknowledge your opinion that a pedestrian bridge across the Ala Wai Canal could allow for shuttle buses to unload and load conventioners on Ala Wai Boulevard, thereby reducing travel time. Again we reiterate that construction of a pedestrian bridge across the Canal is not required to mitigate anticipated convention center pedestrian impacts, though it would provide an alternative drop-off point and route for accessing the convention center. Although travel time of shuttle buses may potentially be reduced depending on location of the respective host hotels, the total travel time savings for conventioners using such a system would not be significant considering the walk time from Ala Wai Boulevard to the convention center lobby. Furthermore, improvements which would need to be provided to implement such an option (i.e., provision of designated bus bays on Ala Wai Boulevard) would incur additional costs, as well as potentially impact the adjacent residences in the area (i.e., potential elimination of a number of on-street parking spaces to accommodate the required bus bays). On the other hand, the convention center is designed to accommodate the shuttle bus loading/unloading area along the Atkinson Drive/Kapiolani Boulevard frontage, away from the residences on Kahakai Drive.

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27. One-Way Street Couplet (Page 5-1)

We acknowledge that the inability of the convention center's design to accommodate the circulator road necessary for the City to implement a one-way counter-clockwise circulation option may necessitate land acquisition on the mauka side of Kapiolani Boulevard if this option is pursued. The City's Waikiki Regional Traffic Impact Plan currently underway will examine the regional traffic impacts and future roadway requirements of the area, including reevaluating the change in traffic circulation and patterns of the major streets in the area. As indicated in the EIS TIAR, due to the uncertainty as to the nature and timing of the proposed regional traffic improvements, the determination was made during the Request for Proposals (RFP) process for development of the convention center to proceed with the design on the basis of existing traffic patterns in the project vicinity. Nevertheless, the State is committed to working with the City toward pursuing future long-term traffic improvements in the project area that will be in the best interest of both the convention center and neighboring areas.

28. Drop Off/Pick Up at Main Entry (Pages 5-4 to 5-5)

The EIS TIAR does not suggest the potential of modifying the convention center's bus/taxi ingress/egress to accommodate any potential change in directional flow of the adjacent streets, such as the one-way counterclockwise option. The EIS TIAR indicates that the conversion of the streets to the counterclockwise operation would adversely affect the passenger drop-off/pick-up operations at the Center's lobby entry drive since the entry drive is designed for right-turn in from Atkinson Drive and right-turn out onto Kapiolani Boulevard. The one-way operation would make it operationally infeasible for buses and taxis makai bound on Kapiolani Boulevard to enter the main entry drop-off/pick-up area of the convention center without requiring potential major changes or improvements which were identified in the EIS TIAR.

Furthermore, the EIS TIAR indicates that the change in directional traffic flow to the counter-clockwise operation would likely require the loading and unloading of shuttle bus passengers on the street side of the entry drive. Since the larger numbers of bus passengers would be required to cross the entry drive to access the lobby, this would result in increased conflicts with vehicular movements in the driveway

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area and potential safety concerns. Under the current design, the only passengers required to cross the entry driveway are those arriving by taxis or private vehicles.

29. Proposed Traffic Patterns and Effect on Vehicle Routes

As previously indicated, the study area for the EIS traffic study was established based upon the intersections anticipated to be most significantly impacted by convention center traffic. Also, additional analyses were conducted of other intersections which could be affected by convention center traffic. Since it is presently undetermined as to which Waikiki hotels would be the host hotels for conventioners, the specific routes of shuttle buses, rental cars, and taxis transporting conventioners from the hotels cannot be determined at this time. Given the distribution of hotels within Waikiki, however, shuttle buses, rental cars, and taxis approaching the convention center from the hotels would be dispersed among the mauka-makai streets along Ala Wai Boulevard. Most importantly, the primary intersections where convention center-related traffic would most significantly impact were analyzed in the EIS traffic study. Furthermore, the additional intersections analyzed as discussed under response no. 2 above confirmed our assertion that there should be no significant convention center traffic impacts beyond these intersections.

Based on discussion with the City DTS regarding the City's proposal for development of the "lanai street" or "cafe street" concept, we understand that Phase I, which was completed last September, consisted of landscaping within the existing sidewalks along Kaiulani Avenue, Lewers Street, Royal Hawaiian Avenue, and Seaside Avenue. It is our further understanding that the subsequent phases of the project are still in the conceptual stages. However, in the event this proposal is implemented, shuttle buses could be redirected to avoid the use of these particular streets (with the exception of the makai end of Lewers Street below Kalakaua Avenue) since no major hotels front on them.

30. People Mover System (Pages 5-7 to 5-8)

We acknowledge your comment that the convention center is among the key stop locations preliminarily identified along the proposed people mover route as identified in the City's

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draft *Waikiki People Mover and Peripheral Parking Study*. The current convention center design does not provide for a dedicated stop for the people mover system. However, in response to the City's Honolulu Public Transit Authority's earlier request, a bus stop will be provided along Kalakaua Avenue fronting the convention center site. Additionally, except during the peak traffic hours of the largest convention, the two bus bays on Atkinson Drive fronting the convention center could be available as people mover stops.

31. Peripheral Parking (Page 5-8)

We acknowledge your comment that as currently contemplated by the City, development of peripheral parking facilities would primarily serve Waikiki employees in order to reduce the volume of traffic entering Waikiki. We further acknowledge your suggestion that some joint use of peripheral employee parking could be available, such as for the food service workers servicing large banquets at the convention center.

32. NETSIM Program

A copy of the input data for the NETSIM program used for the convention center project will be provided to the City DTS. We emphasize, however, that this data be used with the understanding that development of the NETSIM simulation was not intended for the purpose of impact analysis. Rather, it was intended for presentation purposes and for viewing of existing and future traffic circulation in the immediate vicinity of the convention center project site. We will further discuss the convention center's NETSIM capabilities and limitations with the City DTS prior to providing this data.

Urban Design Comments

- a. The materials, finishes and colors on the exterior of the building will be non-reflective and subdued.
- b. All exterior lighting, other than street lights meeting City standards, will be shielded to prevent glare and light spillage into surrounding properties and public rights-of-ways.

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- c. The rooftop garden is at a higher elevation than the neighboring recreation deck. Landscaping and landscaped berms on the Kahakai Drive edge of the garden will prevent people from getting near the edge and looking down on the recreation deck. This will provide privacy and attenuate noise from activities on the rooftop garden by preventing persons on the roof deck from getting near its edge where their voices could be directed toward the recreation deck below. You are correct that landscaping alone will not attenuate noise.
- d. The proper reference is to section 3.14.3 Mitigation. Drilled caissons were considered but soil studies indicated that, structurally, this alternative is not completely satisfactory for this site. For piles that must be driven into the lower coral layer, pre-drilling through the upper coral layer will be performed to lessen the number of blows that would otherwise be required to penetrate that layer.
- e. Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, onto the Ala Wai Promenade.
- f. The Draft EIS identified the Ala Wai Promenade as eligible for listing on the National Register of Historic Places. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade. These include the visual impact of the convention center on the historical character of the Promenade and the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.
- g. Same response as e. and f. above.

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- h. As discussed previously, the SHPD will be reviewing the visual impact of the convention center structure on the historic character of the Ala Wai Promenade. The design/builder is discussing options for softening the visual impact of the walls with the SHPD, including measures such as growing vines covering the wall.

Letter dated June 1, 1995

We acknowledge that your letter (June 1, 1995) is pursuant to your review of our draft letter of May 2, 1995 in which we responded to your March 21, 1995 comments regarding the Draft EIS TIAR. Since then, a convention center traffic impact analysis has been conducted of the projection of traffic conditions in the year 2005 based on comments received on the Draft EIS, including the City DTS. The draft report of this analysis (2005 TIAR) was subsequently forwarded to your agency for review.

We note, however, that your June 1, 1995 letter indicates that the TIAR prepared for the Draft EIS (which analyzed conditions in year 1998) is being revised to provide a year 2005 analysis. We wish to clarify that we maintain that 1998 is the appropriate year for the analysis of traffic impacts of the convention center project. Regarding the 2005 TIAR, we reiterate that the study was conducted in response to comments raised during the Draft EIS concerning distant future traffic conditions resulting from the cumulative impacts of convention center traffic and the growth of non-convention center-related traffic. We reiterate our response no. 1 to your letter dated March 21, 1995 which discusses the bases for the 1998 and 2005 traffic studies.

Also, we note that your June 1, 1995 comments periodically refer to the 2005 TIAR, although this study was not completed at that time. As such, we have based our following responses on the 1998 TIAR, except for those comments referring to the 2005 analysis. Furthermore, where appropriate, we have refined or revised our May 2, 1995 draft responses to address your comments of June 1, 1995. These refinements and revisions are reflected in our aforementioned responses to your letter dated March 21, 1995.

Also, we have since provided your agency with a copy of the 2005 TIAR for review and comments. We have subsequently received two letters dated June 28, 1995 and July 6, 1995 in

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which the City has provided comments to this study. The June 28, 1995 comments were further discussed with Mr. Marvin Char of your agency and representatives of various other City agencies in a meeting held on June 30, 1995. We have provided responses to your letters dated June 28, 1995 and July 6, 1996, which are included herein.

We offer the following responses in the respective order of your letter dated June 1, 1995:

1. Analysis Year 1998

- We have revised our response no. 1 to your letter dated March 21, 1995 to indicate that a traffic impact analysis for year 2005 conditions will be included in the Final EIS document. This letter confirms our understanding of the discussions which were held with your agency on May 12 and May 17, 1995 regarding the 1998 TIAR and the scope of the 2005 TIAR, respectively. Also, we acknowledge that the Waikiki Regional Traffic Impact Plan is intended to address general traffic growth as a result of planned developments as an aggregate, and is not intended to identify the impacts and mitigation measures resulting specifically from the convention center. We note that the convention center is but one of the many traffic generators in the region.
- Both the 1998 and 2005 TIARs identify mitigation measures which would be employed for large conventions, such as the 14,000-person convention. Such mitigation involves operational measures (such as temporary on-street parking restrictions, coning operations, the use of traffic control personnel, etc.) implemented through a transportation management plan. We note that mitigation measures involving roadway improvements are more appropriate for the typical recurring event size, rather than the large size events (such as a 14,000-person event) which occur infrequently.

Although we acknowledge your comment that the assumptions used in the EIS TIAR should remain the same and not change with the size of the event, we reiterate that the assumptions used for the 14,000-

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person event were developed in response to the concerns expressed by the City DTS to the traffic study conducted for the project's environmental assessment (EA). The major concern expressed was that the 35 percent walk mode used in the EA traffic study was too high in terms of analyzing traffic impacts. Toward addressing this concern, the walk mode was reduced to 10 percent for the 14,000-person event in the EIS TIAR to represent a "worst case" traffic situation.

Nevertheless, in consultation with the City DTS, the 2005 TIAR includes an analysis of the 14,000-person event using basically the same travel mode splits (including the 35 percent walk mode) as the 10,000-person scenario in the EIS TIAR.

- We have revised our response no. 1 to your letter dated March 21, 1995 in accordance with your comments. To account for the probability of induced secondary development and potential cumulative traffic impacts, the 2005 TIAR includes the 0.7 percent per year traffic growth factor, in addition to considering a number of proposed or planned projects in the area (those of which specific development has been determined) which may be developed within that time frame. The Final EIS will identify redevelopment in the area as an unresolved issue.
- We have supplemented our response no. 1 to your letter dated March 21, 1995 in accordance with your comments.

2. Study Area

- As indicated in response no. 2 to your letter dated March 21, 1995, analyses have been conducted for additional intersections in the project vicinity. This analyses was conducted in response to comments received on the Draft EIS that additional intersections in the project vicinity should be analyzed for convention center traffic impacts. As indicated, the report on the 1998 conditions of these additional intersection analyses, which will be included in the Final EIS document,

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substantiates the selection of critical intersections initially analyzed, and indicates that impacts on the other intersections are relatively insignificant. Analyses of these additional intersections are also included in the 2005 TIAR.

- We have refined our response in consideration of your comment. See response no. 2 to your letter dated March 21, 1995. We note that our response is not based on any particular method or data, but rather a qualitative observation of the "replacement" logic, using the limit of the number of Waikiki hotel units as a basis.

3. Travel Forecast Assumptions

- As indicated in response no. 3 to your letter dated March 21, 1995, validation and justification for the travel forecast assumptions and travel mode percentages will be provided in the Final EIS TIAR. We emphasize that while inquiries were made with other mainland convention centers with conditions "similar" to Honolulu, there are other factors which make Honolulu unique, thereby influencing the travel forecast assumptions and travel modes. Such factors include Hawaii's geographic location and Oahu's much smaller population within convenient driving distances as compared to most other mainland cities with convention centers.
- We reiterate our response no. 1 (second item) above in response to your comment that the assumptions should be used consistently throughout the analysis instead of changing the assumptions for different conditions.

Regarding the 5 percent taxi mode split for Oahu visitor attendees, the study at the Honolulu International Airport (HIA) was conducted to determine the modal split and vehicle occupancies of domestic arrivals for the HIA Master Plan. We note that inquiries with various convention centers in the mainland indicate that these centers do not have statistics or approximate percentages of visitor attendees who use taxis to the centers.

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The convention center transportation coordinator would be responsible to make arrangements for alternative parking provisions for employees should the convention center's on-site parking be needed for an event. The impacts of the convention center on on-street parking in the nearby areas will be addressed in the Final EIS.

4. Proposed Roadway Improvements and Operational Mitigation Actions for Convention Center Traffic

● Merging activities on Kapiolani:

We have supplemented our response in accordance with your comment. See response no. 4. (Merging Activities on Kapiolani Boulevard) to your letter dated March 21, 1995. As requested, the signal phasing and signal timing at the Kalakaua Avenue/Kapiolani Boulevard intersection for the year 2005 traffic conditions will be provided to the City DTS separately.

● Merging activities on Kalakaua:

We are uncertain as to the basis for your comment that the creation of the bus bay on the ewa side of Kalakaua Avenue adjacent to the convention center is a deviation from the original proposal for four (4) through traffic lanes makaibound on Kalakaua Avenue. The convention center proposal by design/builder Nordic/PCL has never deviated from its original proposal which includes widening of Kalakaua Avenue along its project frontage up to the area of the Ala Wai Promenade/Ala Wai Canal bridge. We wish to further clarify that the proposed City bus stop fronting the convention center along Kalakaua Avenue was designated subsequent to the original design proposal, pursuant to a request by the City Honolulu Public Transit Authority.

We have supplemented our response no. 4 (Merging Activities on Kalakaua Avenue) to your letter dated March 21, 1995 in accordance with your comments regarding the vehicles exiting from the convention

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center parking garage onto Kalakaua Avenue during the PM peak hour.

The merging activities on Kalakaua Avenue would occur mauka of the Kalakaua bridge (from vehicles merging into the through makaibound lanes from the bus taper area), and would not affect the Kalakaua Avenue and Ala Wai Boulevard intersection. The analysis of this intersection accounts for the projected pedestrian crossings, as well as vehicular traffic demand. As requested, the signal phasing and signal timing at this intersection for the 2005 analysis will be provided to the City DTS.

- Egress of Shuttle Bus Loading Area:

While your concerns regarding the shuttle bus merging activities from the convention center's shuttle bus loading area onto Kapiolani Boulevard are acknowledged, we reiterate our response no. 4 (Egress of Shuttle Bus Loading Area) to your letter dated March 21, 1995. As requested, the analysis (calculations) which was used to arrive at our conclusion will be provided to the City DTS.

- Kalakaua Bridge Widening:

We have refined our response to address your comment. See response no. 4 (Kalakaua Bridge Widening) to your letter dated March 21, 1995.

- Kapiolani Boulevard Ewa of Atkinson Drive:

An analysis of project-related traffic impacts at the intersection of Kapiolani Boulevard at Atkinson Drive, which considered the intersection signal phasing and signal timing, was conducted for the 2005 TIAR. The analysis demonstrates that during the AM peak hour, the volume-to-capacity ratio is expected to increase from 0.924 without the project to 0.954 with the project. The 2005 TIAR further indicates that a right-turn only lane on eastbound Kapiolani Boulevard into makaibound Atkinson Drive would reduce the AM peak hour traffic volume-to-capacity ratio to 0.922, which is an improvement compared to the 2005 without project condition.

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- Atkinson Drive:

We have refined our response to address your comment. See response no. 4 (Atkinson Drive) to your letter dated March 21, 1995.

- Kahakai Drive:

We have revised our response based on comments received from the Kahakai Drive area residents on the Draft EIS regarding sidewalk concerns. See response no. 4 (Kahakai Drive) to your letter dated March 21, 1995.

- Signalized Intersection at Atkinson/Kahakai:

We acknowledge your concern regarding the potential problem of vehicles on Atkinson Drive turning left into Kahakai Street queuing back to Kapiolani Boulevard. However, we reiterate our response no. 4 (Signalized Intersection at Atkinson/Kahakai) to your letter dated March 21, 1995. As requested, a plan of the intersection traffic controls, signal phasing, signal timing, and predicted vehicle and pedestrian volumes for the intersection of Atkinson Drive and Kahakai Drive will be provided to the City DTS.

5. Worst-Case Scenario

- The TIAR and Final EIS document will include a discussion of the development and implementation of the transportation management plan (including off-site parking) which will be prepared by the convention center operator prior to specific events, as deemed necessary.

6. Existing Conditions

- We have revised our response to address your comment. See response no. 6 to your letter dated March 21, 1995.

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7. Number of Analyzed Intersections

- We have further clarified our response no. 7 to your letter dated March 21, 1995. Your comment also indicates that the 2005 TIAR should provide an analysis for all 15 intersections for each of the four different time periods. However, pursuant to the meeting between Mr. Marvin Char of DTS, Mr. Dick Kaku of Kaku Associates, and Mr. Phillip Rowell of Parsons Engineering Science (consultant for the 2005 TIAR) wherein the scope of the 2005 TIAR was discussed, it is our understanding that your agency requested the analysis be conducted for a 10,000-person and 14,000-person event scenarios during the AM and PM weekday peak traffic hours.

8. Land Use and Socio-Economic Data

- We have revised our response to address your comment. See response no. 8 to your letter dated March 21, 1995.

9. Reversible Flow Ramp: No comment.

10. Visitor Travel Mode

- As indicated in the EIS TIAR, visitor conventioners travelling to the convention center by City bus should be instructed to disembark at the bus stop mauka of Kapiolani Boulevard (near the Century Center building) to encourage safe crossing. Also, the location of this bus stop provides a shorter walking distance to the lobby of the convention center facility, rather than the bus stop nearest the intersection of Kalakaua Avenue and Ala Wai Boulevard. Therefore, the number of visitor attendees alighting TheBus and crossing the Kalakaua Avenue/Ala Wai Boulevard intersection should be minimal.

During the AM peak hour of a 10,000-person convention, the 642 visitor attendees assumed to ride TheBus to the Center would be distributed among the seven (7) bus routes along Kuhio Avenue, eventually stopping in the near vicinity of the

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convention center. Further analysis of the intersection of Kalakaua Avenue and Kapiolani Boulevard demonstrates that the number of visitor attendees alighting TheBus near the Century Center building would not affect the intersection LOS. The v/c ratio of the intersection would increase by about 0.005.

Also, we wish to clarify that the 642 bus patrons represent the number of visitor attendees assumed to ride TheBus during the AM peak hour of a 10,000-person event. On the other hand, the 851 visitor attendees are those assumed to ride TheBus during the AM peak hour of a 14,000-person convention. In the EIS TIAR, it is recommended that mid-size and large conventions should provide and encourage the use of special convention shuttle services by visitor attendees to minimize their use and impact of public transit during the peak commuter hours.

- See response above (no. 10, first item).
- We have revised our response to address your comment. See response no. 10. to your letter dated March 21, 1995.
- The EIS TIAR indicates that relocation of the utility poles at each end of the Kalakaua bridge could improve conditions to the levels indicated for the center of the bridge where there are no impediments within the walkway. With the pole relocations, pedestrian conditions would improve to LOS C/D, which appears acceptable for a 10,000-person convention. The utility poles on the Kalakaua bridge will be relocated in conjunction with the convention center project. The pedestrian analysis does take into account safety, as well as the directional flow of pedestrian traffic. To provide safer pedestrian movement across the Kalakaua bridge, a divider or barrier could be considered along the curb lane to physically separate the vehicular and pedestrian traffic. Although this is technically feasible, the historic nature of the bridge would require approvals to be subject to additional review, a process which has yet to be initiated. This option is not necessary

Mr. Charles O. Swanson
July 17, 1995
Page 47

to meet capacity requirements, but would increase pedestrian safety.

11. Walk Trips

- In acknowledging your comment, justification of the walk mode assumptions for visitor conventioners is included in the EIS TIAR.
- See response to no. 10, first item above.

12. Project Impacts for Kalakaua/Ala Wai and Ala Moana/Atkinson

- We acknowledge your comment that your department will be reviewing the impact of the additional 2005 forecasts at these intersections.

13. Project Impacts to Kalakaua/Ala Wai

- We have revised our response to address your comment. See response no. 13 to your letter dated March 21, 1995.

14. Project Impacts to Ala Moana/Atkinson

- We have expanded our response with respect to the State DOT further evaluating the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. See response no. 14 to your letter dated March 21, 1995. The 2005 TIAR also includes an analysis of the project-related impacts at this intersection.
- The potential right-turn lane improvement at the intersection of Ala Moana Boulevard at Atkinson Drive (from westbound Ala Moana Boulevard into Atkinson Drive) as is being further evaluated by the State DOT is indicated in the EIS TIAR. The 2005 TIAR includes an analysis of this intersection with the right-turn lane improvement.

15. Travel Mode Split for 14,000 Conventioneers

- See response no. 3 above.

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- The sizes of the conventions at the Miami Beach Convention Center were not indicated with respect to the shuttle bus travel mode percentage for visitor attendees. It would be reasonable to assume that the percentage of shuttle bus ridership would remain relatively constant in proportion to the event size, given the distance of the Miami convention facility from the concentration of Miami Beach hotels (3 to 4 miles).
16. Trip Generation Assumptions for the 14,000 Conventioneers
- See response no. 3 above.
 - See response no. 3 (second item) above.
17. Walk Mode Split for 14,000 Conventioneers
- See response no. 3 above.
 - The 2005 TIAR included an analysis of the 14,000-person convention on traffic conditions in the area, using a 35 percent visitor attendee walk mode. The scope of the 2005 TIAR, which was established in consultation with the City DTS, did not include analysis of the adequacy of existing pedestrian facilities in the area. However, the 10,000-person 35 percent walk analysis saturates convention use of hotels within the 15-minute walk. There is only minimal increase with the 14,000-person above the 10,000-person estimate for existing hotels.
18. Project Impacts for Atkinson/Kahakai/Kona Intersection
- As requested, a plan of the intersection traffic controls, signal phasing, signal timing, and predicted vehicle and pedestrian volumes for the intersection of Atkinson Drive and Kahakai Drive, along with the signal phasing and timing of the Kapiolani/Atkinson intersection, will be provided to the City DTS separately.

Mr. Charles O. Swanson
July 17, 1995
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19. Ala Moana Park Drive

- We have supplemented our response to address your comment. See response no. 19 to your letter dated March 21, 1995. As indicated in our response, the preferred alternative to improving the overall intersection of Ala Moana Boulevard/Atkinson Drive is the widening of westbound Ala Moana Boulevard to provide an exclusive right-turn lane at Atkinson Drive for both 1998 and 2005 traffic conditions as previously mentioned.

20. Evening Post-Commuter 3,000-Person Event

- In response to your comment, we maintain that the travel mode split assumptions for a daytime convention event would differ from that of an evening event at the Center. For the more casual daytime convention, a higher percentage of visitor attendees would more likely use the shuttle bus, public transit, or walk to the Center. For a more formal evening event, more visitor attendees would likely opt to drive rental cars (which their spouses would have during the day) or use the taxi to travel to the Center than if it were a daytime event.
- We have supplemented our response to further justify the percentage of local participation at a 3,000-person Friday evening post-commuter event at the convention center. See response no. 20. to your letter dated March 21, 1995.

21. Traffic Impact Analysis of All-Local Event

- We have supplemented our response in consideration of your comment. See response no. 21 to your letter dated March 21, 1995. We reiterate that the TIAR and Final EIS document will include a discussion of the development and implementation of the transportation management plan (including off-site parking) which will be prepared by the transportation coordinator of the convention center operator. Regarding your comment that the EIS should address the impacts resulting from the vehicular access and the shuttle bus traffic to and

Mr. Charles O. Swanson
July 17, 1995
Page 50

from the off-site parking sites, we note that impacts to the roadway facilities in the respective areas resulting from use of these existing facilities are already occurring and, therefore, would not differ during convention center use.

22. Parking Alternatives

- We have refined our response no. 22 to your letter dated March 21, 1995.
- First, we wish to clarify that our response no. 22 to your letter dated March 21, 1995 does not imply that the approximately 800 parking stalls which were considered sufficient for the earlier First Development, Inc. convention center proposal should also satisfy the needs of the current stand-alone State convention center. The number of on-site parking spaces (800) for the current convention center facility was established on the basis that the Center's primary market is intended to be off-shore national and international conventions, trade shows, exhibitions, and meetings where most of the delegates would be transported to the site by shuttle buses. We acknowledge that the previous convention center proposal incorporated the then-planned rapid transit alignment and a rapid transit station on site, which reduced the need for convention center parking.

Should additional parking be required for an event at the convention center, the transportation coordinator could make arrangements to use existing off-site parking facilities to meet parking needs. The transportation coordinator would be responsible to identify candidate off-site parking sites for convention center parking, and to develop a standing-type agreement and arrangements for use of these facilities. The transportation coordinator would also work with the convention event planner in selecting one of the pre-arranged sites and refining the plan, as appropriate, to provide shuttle service from the pre-arranged site.

23. Trucks and Deliveries: No comment.

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24. Public Transportation

- As indicated in response no. 10 (first item), the 642 bus patrons represent the number of visitor attendees and local resident attendees assumed to ride TheBus during the AM peak hour of a 10,000-person event. On the other hand, the 851 and 266 visitor attendees are those assumed to ride TheBus during the AM and PM peak hours, respectively, of a 14,000-person convention.
- The number of visitor conventioners assumed to ride TheBus to the convention center in the AM peak hour of a 14,000-person convention (851 persons) is relatively small in comparison to the shuttle bus demand (5,958 passengers). The shuttle bus system could accommodate the projected public transit visitor attendee riders by the following: increase the average number of standees in a shuttle bus by about seven persons per bus trip; increase the number of bus trips by 17 trips per hour (which is relatively minimal in comparison to the 122 bus trips assumed for the AM peak hour of a 14,000-person event); or use larger coaches (up to 65-seat coaches are operated by local charter companies) versus 49-seat coaches used in the analyses.

25. Shuttle Bus Operation

The shuttle bus dwell time analysis does account for additional delays expected for buses merging onto Kapiolani Boulevard from the Center's main entry drive. The capacity analysis of the Kalakaua Avenue/Kapiolani Boulevard intersection, as well as the shuttle bus analysis, can be provided to the City DTS during the plan review phase of the project. Also, given the pedestrian routes to the convention center, convention attendees are not expected to cross the entry driveway to enter the lobby. Aside from the Ala Wai Promenade area, the other pedestrian approaches would be from the makai direction along Atkinson Drive and from the corner of Kalakaua Avenue and Kapiolani Boulevard.

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26. Pedestrian Access

- See response nos. 4, 10, and 11 above.

Given the uncertainty as to the composition and timing of future development projects in the vicinity of the site, it would be highly speculative to conduct a pedestrian impact analysis for year 2005.

- We have supplemented our response in accordance with your comment. See response no. 26. in your letter dated March 21, 1995.
- Please be apprised that all pedestrian improvements associated with the convention center project will be designed in compliance with the Americans With Disabilities Act (ADA) guidelines.

27. One-Way Street Couplet: No comment.

28. Drop-Off/Pick-Up at Main Entry

We have supplemented our response to address your comment. See response no. 28. in letter dated March 21, 1995.

29. Proposed Traffic Patterns and Effect on Vehicular Routes

We have revised our response to address your comment. See response no. 29 in letter dated March 21, 1995.

30. People Mover System

We have supplemented our response to address your comment. See response no. 29 in letter dated March 21, 1995.

31. Peripheral Parking: No comment.

32. NETSIM Program: No comment.

Urban Design Comments:

- In order to avoid a potentially lengthy review process pursuant to Section 106 of the National

Mr. Charles O. Swanson
July 17, 1995
Page 53

Historic Preservation Act, a previous proposal for the convention center facility to encroach 26 feet on the Ala Wai Promenade has been modified to eliminate any encroachment.

- We acknowledge that the City and County of Honolulu owns and manages the banks of the Ala Wai Canal.
- The modification involved the retraction of the stairway off of the Promenade and the omission of planter and a pond. The exterior walls of the Loading Dock on either side of the stairway were not changed since they were not on the Promenade. While no portion of the convention center structure will encroach upon the Promenade, the visual impact of the convention center structure, particularly the walls on either side of the grand stairway, on the historic character of the Promenade is a consideration.

The Section 106 Review process involves a determination of "effect" by the State Historic Preservation Division (SHPD). If "no adverse effect" or "adverse effect" is determined, then the National Advisory Council on Historic Preservation is consulted before the permit can be issued. The design/builder has been consulting with the SHPD to determine if the impacts of the convention center on the Ala Wai Promenade can be avoided or mitigated such that a finding of "no effect" can be issued. They are discussing options for softening the visual impact of the walls with the SHPD, including measures such as growing vines covering the wall. The SHPD is taking into account the urban setting of the Promenade and the existing development that presently abuts it. The City may contact the SHPD regarding involvement in the Section 106 review process.

- Any construction of walkways, lighting, landscaping and street furniture in the Promenade will comply with the SHPD's determination of what it will consider as having "no effect" pursuant to the Section 106 Review process. In general, the SHPD has indicated that pedestrian use of the Promenade is consistent with its historic character and that

Mr. Charles O. Swanson
July 17, 1995
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walkways and other improvements to promote such use would also be appropriate to some degree. Their determination of "effect" is being considered in regard to specifics such as the width of the walkways, finishes, type of lighting, etc.

- See response no. 26 to your letter dated March 21, 1995.

Letter dated June 28, 1995

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

- Introduction (page 3) - The 2005 TIAR will reflect the change of "buses" to "shuttle buses".
- Levels-of-service (LOS) calculations (page 16) - As requested, the LOS calculation worksheets will be provided to the City DTS separately.
- Trip generation for cumulative projects (page 21) - The trip generation estimates for the identified cumulative projects were not available for each project. The calculations which were prepared in determining trip assignments for the projects will be provided to the City DTS separately, along with copies of the traffic studies which were available for some of the projects.
- Trip generation assumptions (page 25) - The scope of the 2005 TIAR, including the travel mode split assumptions, was determined in consultation with the City DTS. It was discussed and agreed that the 2005 TIAR would include an analysis of the 14,000-person event using basically the same travel mode splits (including the 35 percent walk mode) as the 10,000-person scenario in the EIS TIAR.
- Mode split assumptions (page 25) - The mode split assumptions for visitors under the 10,000-person scenario with inclement weather inadvertently totaled over 100 percent. This will be corrected in the final 2005 TIAR.
- Project trip generation (page 27) - The 5 to 10 trips generated by vendors and delivery trucks are not included in the 2005 TIAR since it represents an insignificant volume of trips and, therefore, would not affect area

Mr. Charles O. Swanson
July 17, 1995
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traffic conditions. However, as indicated in the EIS TIAR, the transportation coordinator of the convention center should monitor the affect of the arrival and departures of these vehicles on traffic conditions in the immediate area. Should traffic conditions be adversely affected, the transportation coordinator should limit the arrival and departure of these smaller delivery and service vehicles during the peak traffic hours.

- Trip generation comparisons (page 28) - As requested, the back-up data documenting how the trip generation rates for the various convention centers were derived will be provided to the City DTS.
- Trip distribution pattern for convention center area (page 31) - An assessment using the trip distribution pattern percentages set forth in your comment letter was conducted for the year 2005 conditions. In general, although some of the trip assignments were changed from that in the 2005 TIAR, the conclusions and recommendations remain unchanged. A technical memorandum documenting this assessment will be prepared by the consulting traffic engineer and submitted to the City DTS separately.
- Trip distribution/assignment (page 32) - The findings based on your comments will be addressed in a technical memorandum to be prepared by the consulting traffic engineer and submitted to the City DTS separately.
- Mitigation measures (page 39 - letter incorrectly shows page 30) - As indicated in response no. 4, item-2 to your letter dated June 1, 1995, the convention center proposal by design/builder Nordic/PCL includes widening of Kalakaua Avenue along its project frontage up to the area of the Ala Wai Promenade/Ala Wai Canal bridge. The widening allows for vehicles to access the Center's Kalakaua parking garage entrance without using a through lane. We wish to further clarify that the proposed City bus stop fronting the convention center along Kalakaua Avenue was designated subsequent to the original design proposal, pursuant to a request by the City Honolulu Public Transit Authority.
- Mitigation measures (page 41) - The mitigation measure for the Ala Wai Boulevard and Kalakaua Avenue

Mr. Charles O. Swanson
July 17, 1995
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intersection has been clarified in the 2005 TIAR. To mitigate the project impacts, the westbound approach of Ala Wai Boulevard at Kalakaua Avenue, along with traffic signals, should be modified to provide two exclusive right-turn lanes onto maukabound Kalakaua Avenue, and an optional through/left-turn lane. This can be accomplished by reconfiguring the existing lanes within the existing roadway width.

- Remaining issue - As indicated in response no. 29 to your letter dated March 21, 1995, the specific routes of shuttle buses cannot be determined at this time since it is presently undetermined as to which Waikiki hotels would be the host hotels for conventioners. However, as requested, a map showing the most probable routing of shuttle buses, given the existing Waikiki traffic patterns, will be provided to the City DTS separately. Given the distribution of hotels within Waikiki, however, shuttle buses approaching the convention center from the hotels would be dispersed among the mauka-makai streets along Ala Wai Boulevard. Most importantly, the primary intersections where convention center-related traffic would most significantly impact were analyzed in the 2005 TIAR.

Letter dated July 6, 1995

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

1. The 2005 TIAR indicates that a right-turn only lane for traffic turning from eastbound Kapiolani Boulevard to Atkinson Drive would reduce the v/c ratio during the AM peak hour. However, the right-turn lane at this location is not necessary to mitigate convention center traffic impacts in 1998 conditions. The current convention center plans do not include any improvements for providing the separate right-turn lane on eastbound Kapiolani Boulevard at Atkinson Drive.
2. Both the 1998 and 2005 TIARs demonstrate that an additional right-turn only lane on eastbound Kapiolani Boulevard for traffic turning onto Waikiki-bound Kalakaua Avenue is not necessary to mitigate convention center-related impacts.

Mr. Charles O. Swanson
July 17, 1995
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3. The 2005 TIAR demonstrates that widening of the Kalakaua Bridge is not necessary to mitigate convention center-related traffic. Also, the current convention center plans do not include the reconfiguring of the westbound approach on Ala Wai Boulevard at Kalakaua Avenue to provide two exclusive right-turn lanes onto mauka-bound Kalakaua Avenue, and a through/left-turn lane. Roadway improvements to this intersection are not necessary to mitigate convention center traffic impacts in 1998 conditions.
4. The locations where parking will be temporarily and/or permanently prohibited will be identified and coordinated with affected residents and businesses.
5. The procedure to temporarily restrict on-street parking for large daytime or evening events at the convention center is discussed in the EIS traffic study under the section entitled Transportation Management Plan. As indicated in the discussion, it will be the responsibility of the State CCA to ensure that these transportation management plan guidelines and procedures are provided to the convention center operator for use in developing and implementing such plans for events.
6. A transportation management plan, which could include the stationing of personnel at key access points or intersections in and around the convention center site to facilitate the movement of traffic during large events, would be developed by the Center's transportation coordinator. Relevant aspects of the transportation management plan would be coordinated with and reviewed by the City DTS, as appropriate.
7. The locations of permanent guide signs will be considered during the project's design phase and submitted to the City DTS for review.
8. See response nos. 5 and 22 to your letter dated March 21, 1995.
9. The utility poles on each end of the Kalakaua bridge will be relocated to improve pedestrian conditions to acceptable levels. The EIS TIAR also recommends that the sidewalk area at the southeast corner of the intersection of Atkinson Drive and Kahakai Drive be expanded to

Mr. Charles O. Swanson
July 17, 1995
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effectively increase the space for pedestrian queues. Alternatives to accomplish this are still being evaluated. Therefore, it remains an unresolved issue and will be identified as such in the Final EIS.

10. The terms of the agreement which will require the convention center operator to comply with the transportation management procedures will be dealt with upon selection of the operator. The limiting of the number of local participants will be at the discretion of the convention center operator.
11. See response no. 4 (Atkinson Drive) to your letter dated March 21, 1995.
12. Truck turning templates will be used to determine the adequacy of the Kahakai Drive access.
13. The internal layout of the convention center parking garage will be provided to the City DTS during the project's design phase.
14. Through the EIS process for the convention center, the residents of Kahakai Drive were provided a number of opportunities through public informational meetings and television broadcasts to express their concerns regarding traffic circulation and conditions on their street during construction and operation of the convention center. Specifically, a special meeting was held with the Kahakai Drive residents on March 9, 1995 to address their concerns regarding the project.
15. The EIS TIAR does consider traffic entering and exiting the convention center during an evening event. Based on a field investigation conducted on a Friday evening between 6:30 PM and 11:00 PM, it was indicated that the peak traffic hour after the PM commuter peak occurs between 6:30 PM and 7:30 PM, when an evening event at the convention center is expected to commence. The field investigation also showed that traffic on the streets surrounding the convention center decreases substantially during the late evening period when an event at the convention center is expected to disperse.

Mr. Charles O. Swanson
July 17, 1995
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Your letters, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

Attachments

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

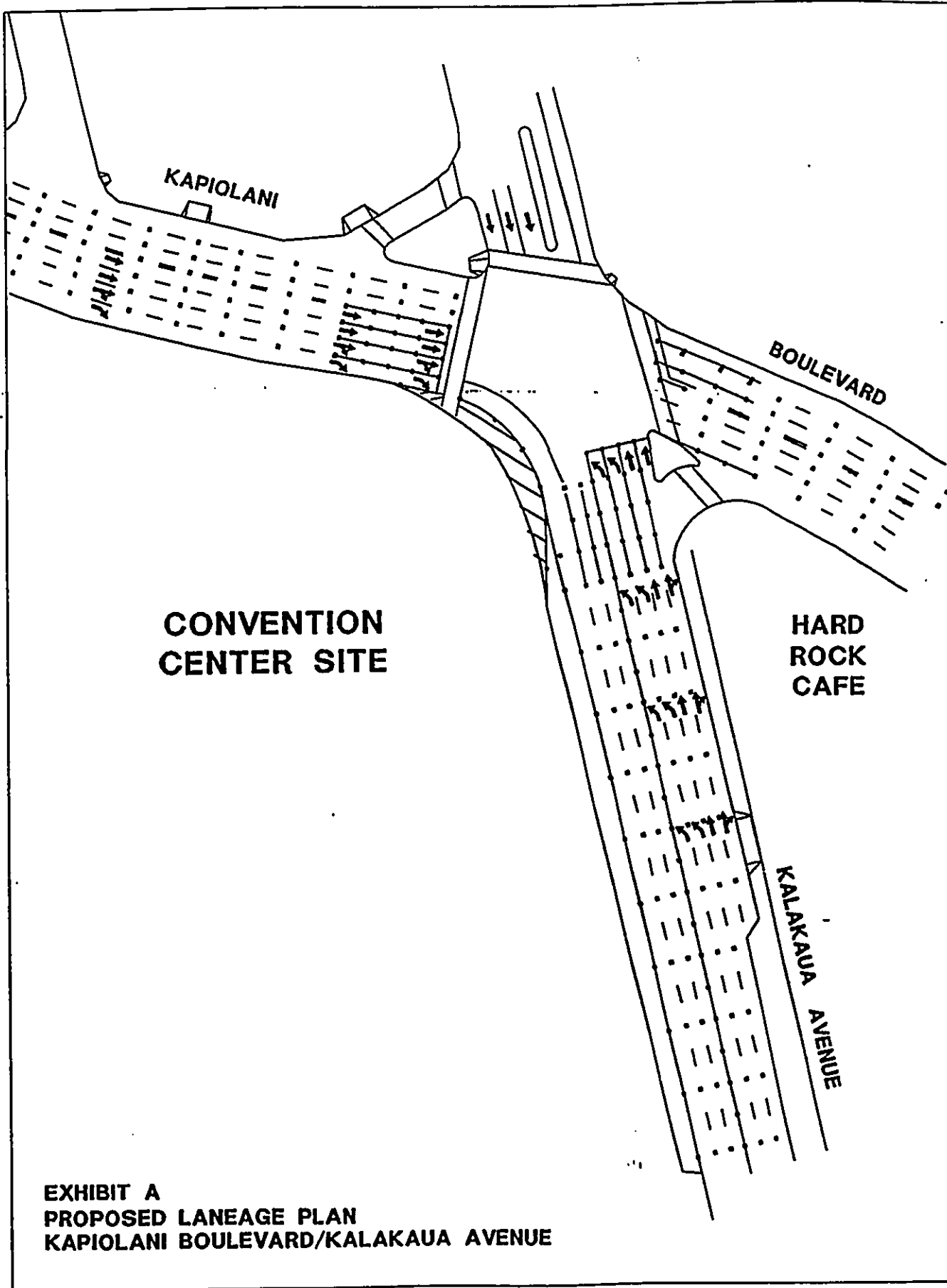
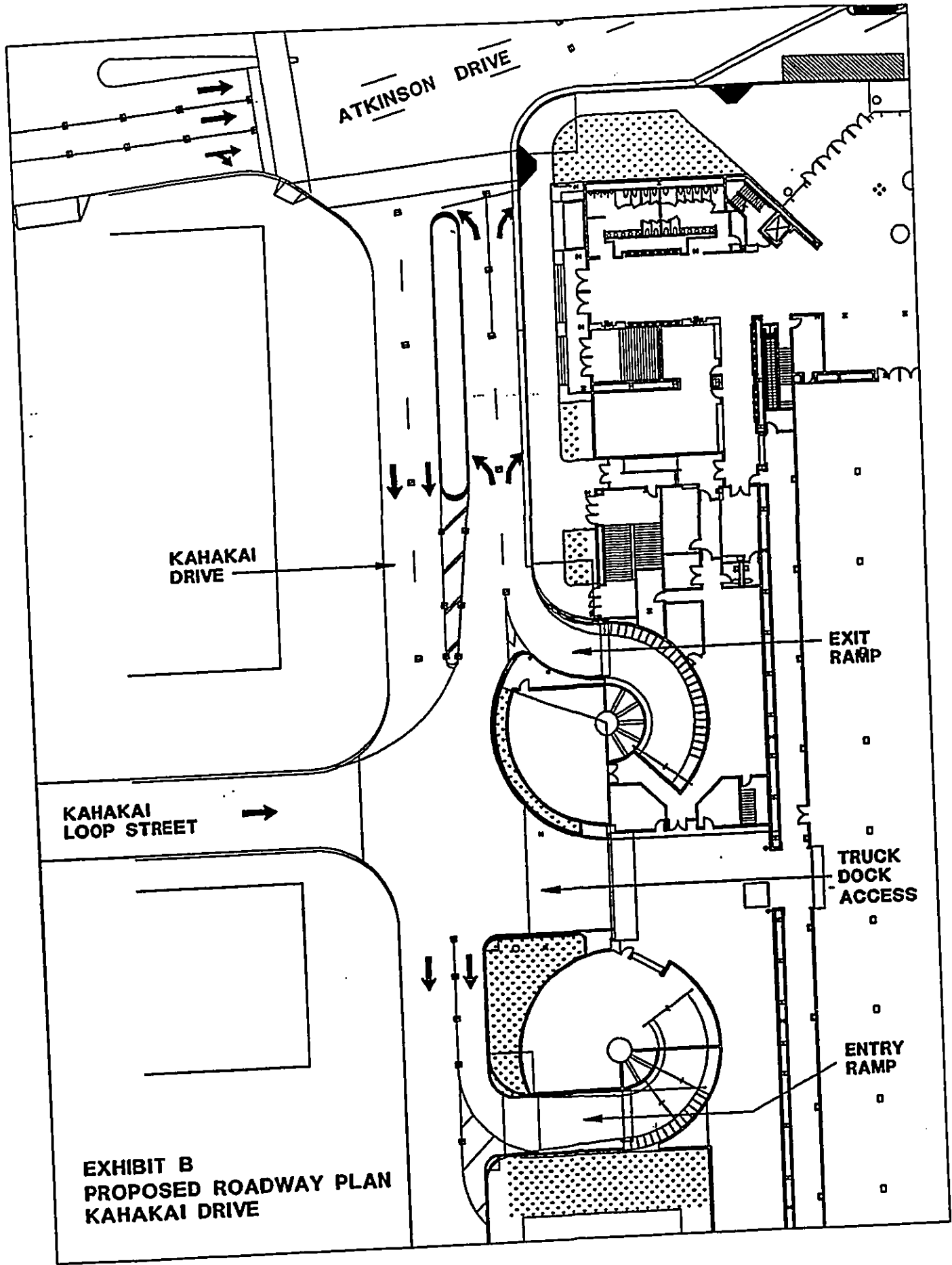


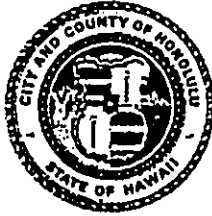
EXHIBIT A
PROPOSED LANEAGE PLAN
KAPIOLANI BOULEVARD/KALAKAUA AVENUE



**EXHIBIT B
PROPOSED ROADWAY PLAN
KAHAKAI DRIVE**

DEPARTMENT OF WASTEWATER MANAGEMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



JEREMY HARRIS
~~FRANK P. FAO~~
MAYOR

FELIX B. LIMTIACO
~~KENNETH M. RAPPOLO~~
DIRECTOR
CHERYL K. OKUMA-SEPE
~~FELIX B. LIMTIACO~~
DEPUTY DIRECTOR

In reply refer to:
WPC 95-25

March 13, 1995

Mr. Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
MAR 16 1995

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement
Hawaii Convention Center
Tax Map Key: 2-3-035:001


Thank you for the opportunity to review the subject environmental impact statement (EIS).

We are concerned about the possible upzoning of the area surrounding the convention center and how it will impact our existing sewer system. A review of the EIS does not address this issue.

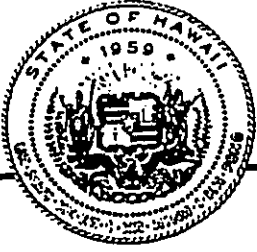
The upzoning of the surrounding area will tax our existing sewer system in Kalakaua Avenue, in Kapiolani Boulevard and in Atkinson Drive. All of these lines are presently at capacity. We also do not believe that the proposed relief sewer line to be placed in Atkinson Drive is sized to accommodate any upzoning.

If you have any questions, please call Mr. Dennis Nishimura at 527-6091.

Very truly yours,


FELIX B. LIMTIACO
Director

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Felix B. Limtiaco
Director
Department of Wastewater Management
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Limtiaco:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 13, 1995
commenting on the subject Draft EIS.

We acknowledge your concerns and will include a reference in
the Final EIS to the cumulative impact on wastewater systems
from potential redevelopment of the lands surrounding the
Convention Center. If surrounding areas are proposed for zone
changes, we believe that established City processes for the
review and approval of developments would be able to consider
the adequacy of the support infrastructure systems, and
require that developers improve the off-site facilities as
necessary to support the proposed development.

We note that, as recently recommended by your department, the
proposed sewer relief line in Atkinson Drive will be sized to
accommodate future development in the surrounding area that
could possibly connect to this line.

Mr. Felix B. Limtiaco
July 17, 1995
Page 2

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

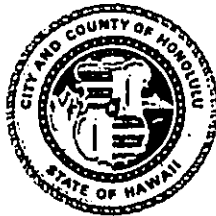
cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

MAR 25 1995

3375 KOAPAKA STREET, SUITE H425
HONOLULU, HAWAII 96819-1869

JEREMY HARRIS
MAYOR



JACOB P. KALEIKINI, JR.
ACTING FIRE CHIEF

March 16, 1995

Mr. Alan S. Hayashi, Executive Director
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

Subject: Draft Environmental Impact Statement
Hawaii Convention Center
Tax Map Key: 2-3-35: 01
Honolulu, Oahu, Hawaii

We have reviewed your application and made an on-site assessment of your request. We have no objections to the proposal, provided the following conditions are complied with prior to approval. Compliance with Article 10 of the Uniform Fire Code shall be made, but not limited to, the following:

1. Provide a private water system where all appurtenances, hydrant spacing and fire flow requirements meet Board of Water Supply standards.
2. Provide a fire access road to within 150 feet of the first floor of the most remote structure. Such access shall have a minimum vertical clearance of 13 feet 6 inches, be constructed of an all-weather driving surface of not less than 20 feet in unobstructed width shoulder to shoulder capable of supporting the minimum 60,000 pound weight of our fire apparatus and with a gradient not to exceed 20%. All dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with an approved turnaround having a radius of not less than 35 feet.
3. Submit construction plans to the building and fire departments for permit review and approval prior to commencement of the project.

(L.G.)

Mr. Alan S. Hayashi, Executive Director
Page 2
March 16, 1995

We foresee no adverse impact in Fire Department facilities or services. Fire protection services provided from Pawaa and McCully engine companies with ladder service from Pawaa are adequate. At the Pawaa Station, there are fifteen (15) personnel assigned each day which consists of five (5) to the Engine, five (5) to the Ladder and five (5) to the Rescue. The McCully Station has ten (10) personnel assigned each day which consists of five (5) to the Engine and five (5) to the Ladder.

Should additional information or assistance be required, please call Acting Captain Stephen Kishida of our Fire Prevention Bureau at 523-4186.

Very truly yours,

Jacob P. Kaleikini Jr.
JACOB P. KALEIKINI, JR.
Acting Fire Chief

SK:jl



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Anthony J. Lopez, Jr.
Fire Chief
Fire Department
City & County of Honolulu
3375 Koapaka Street, Suite H425
Honolulu, Hawaii 96819

Dear Mr. Lopez:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

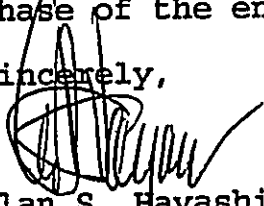
This is in response to the letter dated March 16, 1995 from Mr. Jacob P. Kaleikini, Jr., commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The water system facilities have been designed to meet the Fire Department and Board of Water Supply standards.
2. The fire access road will be off of Kahakai Drive and lead into the truck loading dock area located at the rear (Ala Wai Promenade side) of the Convention Center. The truck loading area has been designed to meet all clearances, turning radii, weight requirements and other Fire Department standards.
3. Construction plans will be submitted to the Building Department and Fire Department for review and approval prior to commencement of the project.

Mr. Anthony J. Lopez, Jr.
July 17, 1995
Page 2

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



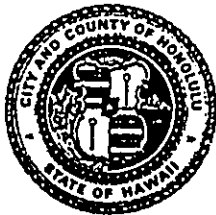
Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

PLANNING DEPARTMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

JEREMY HARRIS
MAYOR



CHERYL D. SOON
CHIEF PLANNING OFFICER
CAROLL TAKAHASHI
DEPUTY CHIEF PLANNING OFFICER

TH/GU 2/95-0209

March 24, 1995

RECEIVED
MAR 24 1995

Mr. Alan Hayashi, Executive Director
Convention Center Authority
841 Bishop Street, Suite 2222
Honolulu, Hawaii 96813

WILSON OKAMOTO & ASSOC. INC.

Dear Mr. Hayashi:

Hawaii Convention Center Draft
Environmental Impact Statement (DEIS),
Honolulu, Oahu, Hawaii, Tax Map Key: 2-3-35: 1

In addition to our transportation comments submitted on March 6, 1995, we are submitting additional comments which reflect the concerns of the Planning Department and the Office of Waikiki Development.

I. SITE PLAN/ELEVATIONS

The DEIS states that the Convention Center's design concept will employ various engineering, architectural, and landscaping techniques in an attempt to minimize the structure's overall height and bulk. However, the DEIS does not clearly explain or illustrate how the various design techniques will accomplish this task. Section 2.2.3 (page 2-5) states that the Convention Center's highest point will be 138 feet at the peak of the double pitch hip roof atop the Ballroom. Chapter 3 (page 3-33) states that the maximum building height has been limited to 150 feet. Furthermore, Figures 2-4 and 2-5 do not identify these differing heights.

Section 2.2.3 of the Final EIS should be revised to clarify the relationship between the proposed design concept and the overall height of the Convention Center. Figures 2-4 and 2-5 also need to be revised by indicating the scale, and height of the Convention Center from each elevation. Additionally, the building heights of the Atkinson Plaza and Summer Palace Condominiums should also be included.

Mr. Alan Hayashi, Executive Director
Convention Center Authority
March 24, 1995
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Currently the City is planning botanical, pedestrian and park improvements to the banks of the Ala Wai Canal.

Existing properties, structures, land use, and the Convention Center's Ala Wai facade will be reviewed for appropriate use, integration into and compatibility with the proposed improvements.

II. SOCIAL IMPACT ASSESSMENT (SIA)

1. The SIA identifies eight areas in close proximity to the Convention Center which are susceptible to change (Figure B, page 53). In addition to these eight areas, the Planning Department believes that there are other areas which may be affected as a result of the Convention Center development.

These areas are the properties fronting both sides of Kalakaua Avenue between Beretania Street and the Ala Wai Canal, which are designated Commercial Emphasis Mixed Use with a general height limit of 150 to 250 feet. Also, the area bounded by the Ala Wai Canal, Ala Moana Boulevard and Kalakaua Avenue is designated Resort Mixed Use, High Density Apartment, and Commercial with a general height limit between 320 and 350 feet. This area contains pockets of vacant or underutilized land which have also been determined to be susceptible to change according to the Waikiki Master Plan.

Although redevelopment is likely to occur in these areas over time, a project such as the Convention Center may cause redevelopment to occur more rapidly or in a manner that is inappropriate with the existing infrastructure.

As part of the recently initiated effort to update the Primary Urban Center Development Plan by the Planning Department, the City will be reviewing appropriate land use controls for these areas as well as the abutting special areas of Ala Moana, Kapiolani Corridor and Waikiki.

The existing City plan contains and is supportive of hotel locations primarily within Waikiki. It will be the recommendation of the City that an increase in hotels and the use of condominiums as resort units in these abutting areas not be permitted.

2. The population figures for Waikiki cited on page 12 and Table 2 of the SIA differ, and should be corrected. Additionally, the Planning Department's Forecast of Resident Population From 1990-2020 By Neighborhood Board

Mr. Alan Hayashi, Executive Director
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indicate the population in all three Neighborhood Boards will increase. In 1990 the resident population for all three Neighborhood Board Areas totaled approximately 59,212. It is anticipated that by 2020, the resident population will increase by 24,598 to approximately 83,810. Such a significant population increase in an already dense urban area should be included in the SIA.

Since the Study Area is based on City and County Neighborhood Board boundaries, we recommend the SIA use population data from the Planning Department's Planning Information Branch which is also broken down by Neighborhood Board.

3. Section 3.2 (Table 7) lists several proposed residential or mixed use projects situated within the Study Area. Table 7 should be revised to include the Waterpark Towers (560 units), and One Kalakaua Senior Living Project (166 units).
4. Section 3.1.2 of the SIA provides a brief discussion of the McCully-Moiliili, Alapai-Sheridan, and the Waikiki Special Areas of the Primary Urban Center Development Plan (DP) Special Provisions. However, the Convention Center is within the Ala Moana Special Area which is generally bounded by Piikoi Street, Kapiolani Boulevard, Makiki Drainage Ditch, Ala Wai Canal, and Ala Moana Boulevard. This is a separate Special Area as specified by Section 24-2.2(b)(8) of the DP Special Provisions for the Primary Urban Center and not a subdistrict of the Waikiki Special Area as implied on page 30 of the SIA.

We recommend that the SIA be revised to clarify this distinction, and include a separate description of the Ala Moana Special Area. Additionally, the Kakaako and Nimitz/Ala Moana Corridor Special Areas (Sections 24-2.2(b)(6) and (7)), should also be included since these Special Areas fall within the SIA's Study Area.

5. Construction of the Convention Center and potential redevelopment of nearby properties may negatively impact the amount of on-street parking in the area. The TIAR (page 4-10) states that proposed improvements to Kahakai Drive will eliminate approximately 7 on-street stalls on the mauka-side, and 5 spaces on the makai side (during large events).

Therefore, Section 4.2.3 and Table 9 of the SIA should mention the loss of on-street parking for both area residents and businesses.

Mr. Alan Hayashi, Executive Director
Convention Center Authority
March 24, 1995
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6. The following comment was inadvertently omitted from our previous comments dated March 6, 1995, regarding the Transportation Impact Analysis Report (TIAR) contained in the DEIS and related traffic issues.

The TIAR (page 3-1) bases its Waikiki traffic growth rate projection on land use data used by Cambridge Systematics, Inc. (CSI) in its 1993 report Waikiki Regional Traffic Study.

Please be informed that the land use data used in the CSI study has been updated by the Planning Department and should have been used in the TIAR. The Traffic Management Consultant should consult with the department's Planning Information Branch for the updated data.

7. Due to the Convention Center's multiple impacts to the surrounding area, the applicant should submit a DP Public Facilities Map Amendment to add a symbol for a "Government Building" publicly funded, site determined, within six years.
8. Section 5-7 of the DEIS states that the project will increase the demand for police services due to a potential increase in crime, and the need for traffic control. However, the DEIS does not explain how the need for additional police services will be handled, nor does it describe plans to hire private security. The Final EIS should explain whether the Convention Center will provide their own security; and how they intend to control traffic.

III. UNRESOLVED ISSUES

In addition to the unresolved issues stated in Section 8.4 of the DEIS, the Planning Department believes that the following issues should also be added as unresolved if they cannot be adequately mitigated.

1. Parking - The design of the Convention Center permits up to a maximum of 800 vehicles. However, there will most likely be events where additional parking sites will be required. The applicant has not given reasonable assurances as to how parking impacts will be mitigated.
2. Circulation - The Convention Center will generate additional pedestrian and vehicular traffic. The applicant has not comprehensively analyzed the regional pedestrian and vehicular traffic impacts within the surrounding sub areas due to the Convention Center, and other traffic generators such as proposed residential and mixed use developments.

Mr. Alan Hayashi, Executive Director
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3. Susceptibility to Change - Although the DEIS acknowledges that certain properties around the Convention Center are susceptible to change, there are likely to be pressures to redevelop properties beyond the scope of the SIA's analysis. While the extent of future change or redevelopment cannot be quantified, the Final EIS should acknowledge that change is often felt throughout the entire region.

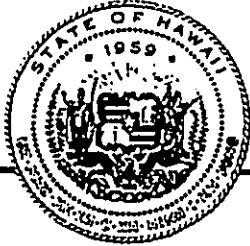
Sincerely,

*Cheryl D. Soon for
C. D. S.*

CHERYL D. SOON
Chief Planning Officer

CDS:js

cc: ✓ Wilson Okamoto & Associates, Inc.
OEQC
DTS



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Cheryl D. Soon
Chief Planning Officer
Planning Department
City & County of Honolulu
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

I. Site Plan/Elevations

A number of design features have been incorporated into the Convention Center development to reduce the structure's overall height and bulk. The Kalakaua Avenue facade will create a terraced impression as planters, balconies, and trellises rise in a series of steps away from the street to the pitched roof of the Ballroom. The open perimeter parking on the second level is set back from the Meeting Room level above it. The perceived height of the building from the sidewalk frontage is 70 feet, with the top level ballroom not visible from the sidewalk. The Ala Wai Promenade facade presents a terraced landscaped park-like appearance with a central stairway. The Atkinson Drive-Kapiolani facade features the visual openness of the canvas sails atop the lobby entrance and roof, and the 80-foot high lobby enclosed by a hanging glass curtain. Some reduction of building height has been achieved by the placement of the parking level above the Exhibition Hall, making efficient use of the spaces required for the support trusses spanning the Exhibition Hall.

The maximum height of the Convention Center will be 138 feet above ground level at the peak of the double pitch hip roof atop the Ballroom (the 150-foot reference is incorrect and will be revised in the Final EIS). The elevation drawings provided were meant to be

illustrative, therefore, building dimensions were not provided on them.

II. Social Impact Assessment

1. The Social Impact Assessment (SIA) methodology included (1) a review of what is allowed under current zoning; (2) an assessment of the extent to which lots have been built up, given present zoning; and (3) a review of landownership patterns. Selected properties fronting Kalakaua Avenue (see page 52 and Figure B) did meet this criteria, but most of the remaining frontage includes lots which would require consolidation and/or zone changes to undergo substantial redevelopment. The same is true for the Hobron area.
2. We will correct the population number discrepancy in the SIA. The updated information regarding forecasts of population increases in Neighborhood Board areas will also be incorporated in the SIA. We appreciate the census and forecast information by Neighborhood Board area which was provided by your Department.
3. The referenced table will be revised to include the Waterpark Towers, but the One Kalakaua Senior Living Project will not be included since it lies beyond the SIA study area.
4. As requested, a separate sub-heading will be added to distinguish the Ala Moana Special Area from the Waikiki Special Area. Relative to the need for discussing the Kaka'ako Special Area and the Nimitz/Ala Moana Special Area, the purpose of the discussion in the SIA was limited to identifying areas and policies which were believed to be directly relevant to the site or project. We note that the Kaka'ako District was referenced in Section 3.1.5 as an area under the jurisdiction of the State of Hawaii.
5. The referenced loss of on-street parking resulting from development of the convention center will be discussed in the SIA and the Final EIS document. We would like to clarify that the only on-street

parking which will be permanently eliminated are the five (5) spaces on the ewa side of Atkinson Drive between Kapiolani Boulevard and Kona Street. The elimination of these parking spaces is necessary to provide an exclusive left-turn lane on makaibound Atkinson Drive at Kahakai Drive. We would also like to clarify that the seven (7) parking spaces along the Kahakai Drive project frontage are currently prohibited due to emergency access purposes. The EIS Transportation Impact Analysis Report (TIAR), however, references these stalls in recognition that area residents presently park along this side of Kahakai Drive. The EIS TIAR will include clarification that these seven (7) parking spaces are currently prohibited.

6. At the time that the 1998 TIAR was prepared for the Draft EIS, the travel forecast and land use assumptions developed by the Cambridge Systematics, Inc. 1993 study, which was used as the basis for estimating future growth in background traffic, was the most recent available travel forecast for the project vicinity.

However, in response to concerns about more distant future traffic conditions resulting from the cumulative impacts of convention center traffic and the growth of non-convention center-related traffic, a projection of traffic conditions in the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a traffic growth factor of 8 percent (from 1995 to 2005) which was derived in consultation with the City DTS. This traffic growth factor is consistent with the average growth of the socio-economic parameters used in the City's Waikiki Regional Traffic Impact Plan. In addition to the intersections analyzed in the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR), the 2005 study also

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includes an analysis of additional intersections in the project vicinity. These additional intersections are those assessed in 1998 conditions to demonstrate that the significantly affected intersections have been considered in the EIS TIAR (the additional intersections analyses will be included in the Final EIS document). Although the analysis of traffic conditions in the year 2005 reflects the convention center-related impacts, its primary intent is to demonstrate the conditions that result from the continued growth in traffic not directly associated with the convention center. Its implication will be that the City and State need to work cooperatively to prevent the deterioration of traffic conditions to the degree that it adversely affects the community as well as convention center operations.

7. As the Convention Center development is already contracted for construction, it would not be feasible to process and obtain approval for a Development Plan Public Facilities Map Amendment prior to the start of construction. If such an inclusion can be administratively processed without incurring any delays to our schedule, we would have no objections. Please be assured, however, that we are closely coordinating all aspects of the design and construction plans review and approval with all affected agencies and departments of the City and County of Honolulu.
8. We acknowledge that additional police service will be required as a result of developing the convention center. Convention Center event organizers will be responsible for providing traffic control as needed based on the size of the event and anticipated traffic demands (including the possibility of contracting with off-duty police officers).

The Convention Center operator will be responsible for providing adequate private security personnel for the facility and for events held at the facility. Security facilities and systems to be provided include a central security office adjacent to the lobby, an exterior door monitoring system,

space-protection devices, emergency call devices, closed circuit television cameras with monitors, and a card-access control system.

III. Unresolved Issues

1. Parking. The convention center operator will have a transportation coordinator on staff to assist in the development and implementation of a transportation management plan (including parking) for events at the Center. Toward mitigating parking impacts, the EIS TIAR offers a number of parking alternatives that could become part of an overall transportation management plan which would increase the number of available stalls or provide alternatives to parking at the convention center.

To the extent that event planners may require off-site parking for certain events (i.e., predominantly local attendance or all-local-attendee events), arrangements could be made by the transportation coordinator of the convention center to use existing outlying parking facilities that may be available during the event. The attendees would be required to park at the off-site facility and be transported by shuttle buses to and from the convention center. It is uncertain at this time as to which parking alternative(s) or existing outlying parking facilities would be used and the number of available parking stalls. However, such existing off-site parking facilities could include those at the Blaisdell Center or the University of Hawaii at Manoa campus, although there is no formal agreement to use either of these parking facilities. As indicated above, the convention center transportation coordinator would be responsible to prepare a basic transportation management plan which would be submitted to the City Department of Transportation Services for review.

2. Circulation. Your concerns regarding potential regional vehicular and pedestrian impacts due to the convention center and other traffic generators such as proposed residential and mixed use developments are acknowledged. We note that the

Ms. Cheryl D. Soon
July 17, 1995
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purpose of the EIS TIAR is to identify potential traffic and transportation-related impacts resulting from the convention center and to identify appropriate mitigation measures. The TIAR includes an annual traffic growth rate of 1.5 percent through 1998 to account for potential development in the project area. Also, as previously discussed, the 2005 traffic analysis includes a 0.7 percent per year traffic growth factor, plus considers a number of proposed or planned projects within the study area which may be developed within that time frame.

On the other hand, a far better forum to address the regional vehicular analysis (and avoid duplication of efforts) is the City's Waikiki Regional Traffic Impact Plan which is the appropriate study to analyze traffic impacts of existing and future conditions in the region to the year 2005, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). As discussed in our meetings with the City Department of Transportation Services, it was agreed that the City would incorporate the traffic data from the convention center TIAR into its regional study. Likewise, the State Convention Center Authority (CCA) will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

The pedestrian traffic generated by the convention center is not anticipated to have a regional impact within the surrounding sub areas. The more conservative 35 percent walk mode split analyzed for pedestrian impacts in the EIS TIAR is based upon the 15-minute walking distance established by the 1989 survey (modified to include the Hawaii Prince Hotel) which grouped the inventory of hotels and short-term rental condominium units by walking distance to the convention center site. In discussions with managers of various mainland convention centers and Waikiki hotels, it is indicated that conventioners would most likely walk to destinations located within a 10-minute

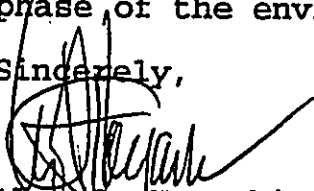
Ms. Cheryl D. Soon
July 17, 1995
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range. Persons associated with the Hilton Hawaiian Village Hotel and the Hyatt Regency Waikiki indicate that in their experience, people would likely walk to destinations within a four- to five-block range or within a 10-minute range. Given Hawaii's warm climate, along with a convenient shuttle bus system and the structured schedule of conventions, it is anticipated that most conventioners would not walk to the convention center from hotels located beyond the 15-minute range (i.e., the major hotel concentration from the Sheraton Waikiki to the Hyatt Regency to Outrigger West). The EIS TIAR correspondingly reflects a significant decrease in the percentage of conventioners (10 percent) assumed to walk in the over 15-minute range.

3. Susceptibility to Change. We acknowledge the difficulty in quantifying the extent of future change and redevelopment, and the likelihood for additional pressures on development which may be felt throughout the region.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

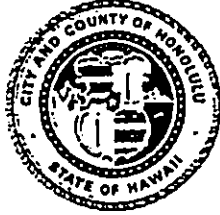
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111

JEREMY HARRIS
MAYOR



MICHAEL S. NAKAMURA
CHIEF

HAROLD M. KAWASAKI
DEPUTY CHIEF

OUR REFERENCE
BS-DL

March 20, 1995

MAR 22 1995

Mr. Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

Dear Mr. Hayashi:

This is in response to your letter of January 27, 1995,
requesting for comments on a Draft Environmental Impact Statement
for the Hawaii Convention Center.

You have responded adequately to our concerns in Volume II about
traffic, parking, security, etc. At this time we have no further
comments.

Thank you for the opportunity to review this document.

Sincerely,

MICHAEL S. NAKAMURA
Chief of Police

By
EUGENE UEMURA, Assistant Chief
Administrative Bureau

cc: Gary L. Gill
Office of Environmental Quality Control

✓ Earl K. Marsukawa
Wilson Okamoto & Associates, Inc.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Michael S. Nakamura
Chief of Police
Police Department
801 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Nakamura:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 20, 1995 indicating that we have adequately responded to your concerns about traffic, parking, security, etc., in Volume II of the subject Draft EIS and that you have no further comments.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

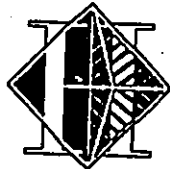
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER FIVE

CITY COUNCIL
Comments Received and Responses



Hawai'i Convention Center



ANDY MIRIKITANI
COUNCIL MEMBER
(808) 547-7005

MAR 23 1995

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96813 - 3065

March 24, 1995

Alan S. Hayashi,
Executive Director
Convention Center Authority
1833 Kalakaua Avenue, Suite 800
Honolulu, HI 96815

Re: Hawaii Convention Center, Draft Environmental
Impact Statement, The Convention Center Authority, State of
Hawaii, January 1995

Dear Mr. Hayashi:

Thank you for the opportunity to provide comment on the Hawaii
Convention Center Draft Environmental Impact Statement.

While I support the development of a convention center at an
appropriate site, I share the concerns as expressed by residents
regarding the State Legislature's Hawaii Convention Center at the
former Aloha Motors site and its Draft Environmental Impact
Statement (DEIS). The Convention Center DEIS is incomplete and
fails to provide a comprehensive and regional analysis with regard
to the major impacts which a large-scale project such as the
convention center will have on the surrounding region from Waikiki
to the Ala Moana and McCully-Moiliili areas.

Far too many community concerns as to the serious negative impacts
to the surrounding residential communities have not been fully
addressed and complied with. I share the concerns of residents and
others like representative Mary Jane McMurdo who have proposed that
the proposed State Convention Center be located at the Kakaako
waterfront in the Fort Armstrong area. The Kakaako Redevelopment
Authority has provided new infrastructure such as widened streets,
and minimal costs for the State-owned land at the Kakaako
Waterfront would save taxpayers millions during this time when the
State is facing a 250 million budgetary shortfall and is cutting
educational programs.

The success, viability and popularity of the Aloha Tower Marketplace right by the Fort Armstrong area to attract visitors has proven that the axis of growth has shifted, and such future redevelopment lies in that area and can be successful in attracting business and tourists without being located in Waikiki. Also, the Director of the City Department of Transportation Services wants to emphasize water transportation and undertake a major study to promote this mode of travel. A Kakaako Convention Center would directly benefit from a water transportation system and alleviate traffic congestion. Locating the convention center on the Kakaako waterfront in conjunction with a water transportation system feeding from the airport and Waikiki to the convention center would enable Hawaii to sell one of its greatest natural attractions while keeping cars and delivery trucks off the streets going to the convention center.

With up to 14,000 people projected to attend a single event at this convention center site (far more than any event held at the Hilton Hawaiian Village and Sheraton Hotels), traffic will come to a standstill. There will be enormous impacts to the surrounding communities which will overburden the existing police and fire protection, traffic and other infrastructure. It is imperative that concerns regarding serious impacts on the various residential communities (McCully-Moiliili, Ala Moana, Waikiki) along and around this proposed development be resolved to the satisfaction of affected residents in the area. By the State Legislature voting to locate the convention center on the former Aloha Motors site, this proposed project will severely diminish the quality of life for all residents in these residential communities. Given its large physical scale and the great amount of activity it would generate, the project would have a dramatic effect on a regional scale (McCully-Moiliili, Ala Moana, Waikiki) in terms of significantly increased traffic congestion (buses, taxis, rental cars, heavy truck transport), noise (construction, conventions and other related activity), crime and extending criminal activity from Waikiki, pedestrian volume, property taxes as well as decreasing on-street parking for area residents.

This convention center site will significantly impact and divert already scarce and limited Honolulu Police Department (HPD) protection resources and services from surrounding residential communities which currently are experiencing at less than fully-staffed police coverage. The Aloha Motors convention center will force HPD to reallocate protection services to tourists at the expense of reducing and diminishing HPD's ability and responsibility to conduct patrol and enforcement coverage in residential neighborhoods. The City can ill afford to bear the cost of providing services to mitigate the convention center's negative impact when it is currently considering the possibility of cutting current services and existing programs because of an anticipated budgetary shortfall of \$50 to \$75 million. The Aloha Motors convention center will severely tax and exhaust the City's ability to serve its citizenry and provide basic and necessary services such as police and fire protection to residential

communities situated along and around this proposed project.

With regard to the issue of traffic congestion and the project being situated on a major transportation access route into Waikiki (Kapiolani-Kalakaua intersection), the DEIS fails to address traffic-related impacts on a regional, macro level and its effect on adjoining streets from Ala Moana Boulevard to King Street and Kaheka to McCully. Placing the convention center at the former Aloha Motors Site would result in severe traffic congestion not only in the Kalakaua-Kapiolani intersection and immediate street sectors (Hobron and Kahakai) but cause severe overflow and congestion on roadways situated in adjoining areas such as the Ala Moana and Moiliili residential areas. In addition, given that the project will sit on a major access route into Waikiki and generate a enormous amount of vehicular activity at this intersection, motorists will be forced to change their driving behavior by avoiding the Kalakaua-Kapiolani intersection and proceed to other access routes into Waikiki such as the McCully, Ala Wai Gateway and Kapahulu roadways. The Aloha Motors site will pose a grave threat to impeding circulation ingress and egress into Waikiki and will require that improvements be made to expand the Kalakaua Avenue in order to accommodate the increased volume of traffic. This brings to issue as to whether the City, given its limited financial resources and projected budget shortfall, will be required to provide the funding to construct this necessary public improvement to the Kalakaua Avenue bridge.

With regard to the issue of development pressure, the DEIS fails to provide a comprehensive analysis on a parcel-by-parcel basis as to how these parcels will be negatively impacted by dramatically increased development pressures to build new hotel and commercial developments and be unable to remain in their current existing activity use. In addition, the DEIS fails to provide which residential areas will be subject to the displacement of existing affordable housing and escalating property taxes and which areas will become prone to commercial development, thereby resulting in a drastic change in the character of the area and producing an environment not compatible to the Waikiki, Ala Moana, McCully-Moiliili residential communities.

In conclusion, I would strongly recommend that a more comprehensive and regional impact analysis in accordance to residents concerns be conducted in order to fully assess the severe impacts this project would have on the surrounding region. Placing the convention center on the former Aloha Motors Site would be premature until resident concerns regarding impacts to the surrounding community are fully addressed. Thus in light of the serious impacts and inequitable burdens this project will have on the surrounding region, I again reiterate and strongly recommend that the Convention Center be relocated to the Kakaako waterfront.

I am incorporating herein by reference the attached resolutions.

Very truly yours,

Andy Mirikitani

ANDY MIRIKITANI
Councilmember, District V

enc:

AKM:rb

RESOLUTION

URGING THE STATE LEGISLATURE TO PROVIDE STATE FUNDS TO RESPONSIBLY ADDRESS THE IMPACTS ON CITY INFRASTRUCTURE AND SERVICES RESULTING FROM THE CONSTRUCTION OF THE CONVENTION CENTER.

WHEREAS, the Convention Center development at the old Aloha Motors site will have a significant impact on City infrastructure and City services, including but not limited to significant increases in traffic congestion, parking and noise problems and new demands for already sparse and limited fire and police services resulting from a projected maximum of up to 14,000 people at a time attending conventions at the site; and

WHEREAS, according to the Draft Environmental Impact Statement, the State Convention Center development will dramatically increase development pressures to redevelop the surrounding commercial and residential areas, including additional hotel development in the surrounding areas which will further compound impacts and the demand for City services; and

WHEREAS, because the City's jurisdiction over zoning and other land use development laws has been preempted by the State, the State has become the developer of the project and the City has been precluded from the standard procedure requiring the State, as would be required of a private developer, to provide funding to mitigate such impacts to the surrounding community; and

WHEREAS, the burden imposed on City infrastructure and services and the increased costs to the City created by the State's development of the Convention Center effectively constitutes an unfunded State mandate on the City; and

WHEREAS, the practice of State government of imposing unilateral, unfunded mandates on political subdivisions is at odds with modern legislative trends, as evidenced by a bill pending in Congress which would prohibit unfunded Federal mandates, and is also contrary to the provisions of Article VIII, Section 5, of the State Constitution, which reads:

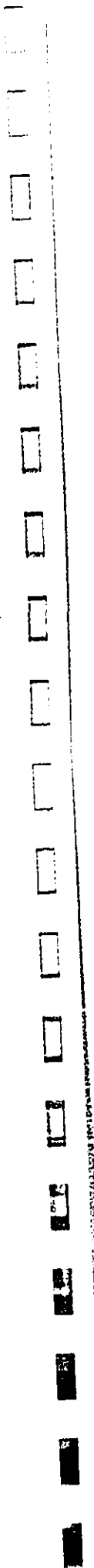
If any new program or increase in the level of service under an existing program shall be mandated to any of the political subdivisions by the legislature, it shall provide that the State share in the cost;

and

RESOLUTION

enforcement coverage in residential neighborhoods; now,
therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that it urge and hereby does urge the State Legislature and the Hawaii Convention Center Authority to create, construct and fully staff a Honolulu Police Department substation as part of the Convention Center development to responsibly address the impact of the Convention Center on police protection services in the City; and



RESOLUTION

URGING THE STATE LEGISLATURE AND THE HAWAII CONVENTION CENTER AUTHORITY TO CREATE, CONSTRUCT AND FULLY STAFF A HONOLULU POLICE DEPARTMENT SUBSTATION AS PART OF THE CONVENTION CENTER DEVELOPMENT TO RESPONSIBLY ADDRESS THE IMPACTS ON POLICE PROTECTION SERVICES.

WHEREAS, the Honolulu Police Department (HPD) has stated that the State Convention Center development at the old Aloha Motors site will have a significant impact on existing police protection services due to increased crime, dramatically increased traffic congestion, parking and noise problems; and

WHEREAS, according to the Draft Environmental Impact Statement, the State Convention Center development will dramatically increase development pressures to redevelop the surrounding commercial and residential areas, including additional hotel development in the surrounding areas which will further compound the demand for police services; and

WHEREAS, the HPD already has police beats around Oahu which are not fully staffed: of the 20 police beats, 14 are not fully staffed, despite increasing crime; and

WHEREAS, crime is increasing statewide, as well as in communities surrounding the State Convention Center at the old Aloha Motors site, including the McCully and Moiliili neighborhoods where many elderly citizens reside; and

WHEREAS, the HPD is already facing the prospect of having to reduce police programs and services as a consequence of the enormous anticipated City budget shortfall of between \$50 and \$75 million; and

WHEREAS, the development of the State Convention Center at the old Aloha Motors site constitutes, in essence, another State-imposed unfunded mandate on the City by placing the burden on City infrastructure and services without the State funding the necessary improvements; and

WHEREAS, the increased demand for police protection services which will result from the State Convention Center development at the old Aloha Motors site will divert already scarce and limited resources and manpower coverage away from police beats which are not fully staffed in the surrounding residential communities and other residential areas of the City and, instead, to the Convention Center area to protect visitors; thereby reducing the HPD's ability to conduct patrols and provide effective

DOCUMENT CAPTURED AS RECEIVED

COUNCIL
OF HONOLULU
HAWAII

No. _____

RESOLUTION

WHEREAS, there is a need for funding support from the State Legislature to fund the costs of mitigating the Convention Center's negative impacts, as identified in the draft Environmental Impact Statement, particularly since the City can ill afford to bear such costs at a time when existing programs and services may be cut as a consequence of the anticipated City budget shortfall of between \$50 and \$75 million; and

WHEREAS, to provide City services and programs, the City relies primarily on raising revenues from property taxes, which constitute 62% of the City's general fund, and increasing demands and costs will force raising property taxes; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that it urge and hereby does urge the State Legislature to provide State funds to responsibly address the impacts on City infrastructure and services resulting from the construction of the Convention Center; and

BE IT FURTHER RESOLVED that the State Legislature be and hereby is urged to explore the possibility of increasing the hotel room transient accommodations tax rate which is paid for by tourists rather than residents, and fund the increased infrastructure demands resulting from the construction of the Convention Center; and



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Councilmember Andy Mirikitani
City Council
City & County of Honolulu
Honolulu, Hawaii 96813

Dear Councilmember Mirikitani:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Your general comment that the Draft EIS fails to provide a comprehensive regional analysis and that negative impacts of surrounding residential communities have not been fully addressed does not provide specific bases for us to respond. However, assuming this comment is in reference to specific items described further on in your letter, we are addressing them individually in the following response.

Your comments regarding the consideration of an alternative site for the convention center revisits issues which were discussed in several studies which were cited in the Draft EIS. However, the CCA is presently mandated by the legislature to build the convention center at the Aloha Motor's site. Therefore the alternative site issue is moot at this time. However, for discussion purposes the Kakaako-site offers some advantages but its distance from Waikiki hotels was cited as a major disadvantage. While waterborne transportation from Waikiki sounds feasible on the surface, working out the details of such a system at the level of detail required for an EIS would probably reveal more considerations than would be apparent on the surface. For example, there is the need to build ferry terminals, including any required dredging for channels through reefs; conflicts with swimmers, surfers and canoers; and, shuttle bus staging and parking areas at ferry terminals and associated traffic considerations.

In addition, because of the varying size of convention events, the passenger capacity of ferry vessels and the size of the

Councilmember Andy Mirikitani
July 17, 1995
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required fleet would be important considerations. One of the factors working in favor of bus service is that there are sufficient tour buses on Oahu to meet the type of demand that would be created by the convention center. The size of the tour bus fleet is related to the number of hotel rooms on Oahu. Thus, when most of the rooms are occupied by conventioners, the buses would transport its occupants to the convention center. When the rooms are occupied mostly by vacationers, they would transport its occupants to visitor attractions.

It is difficult to imagine a comparable ferry fleet that could economically transport participants for widely varying sizes of conventions unless they become part of a large visitor industry transportation system like the tour bus fleet. A ferry vessel holding 300 persons would require 20 trips to transport 6,000 conventioners within the peak hour, which is envisioned as the number that would be transported by bus during the peak traffic hour for a 14,000-person convention event. An additional 1,400 pedestrian conventioners assumed to walk to the proposed convention center would have to be added to the ferry count, bringing the total number of ferry trips to 25 in the peak hour. The remainder is assumed to go by other mode of land transit, go before or after the peak hour, or not attend at all. Assuming that each ferry could make a round trip in as little as 30 minutes, which is unlikely, this would mean that at least 13 vessels would be required for an event that is projected to occur once in three years. Maintaining such a fleet of ferries would imply that they would be involved in other economically viable transportation activities when they are not transporting conventioners. We have difficulty imagining a private interest investing in such a venture.

With regard to a waterborne public transit system, it should be noted that the State Department of Transportation attempted to initiate such a system in 1988, but it was not viable. Using such a system to transport conventioners would be analogous to relying on the City bus system to get conventioners to the convention center. Ferries would need to be diverted from their normal commuter routes to supplement the Waikiki to Kakaako run during the commuter rush hour. Such interruption of service would not be conducive to establishing a successful waterborne commuter transit system.

Councilmember Andy Mirikitani
July 17, 1995
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Your prediction that traffic would come to a standstill during the 14,000-person event is not supported by the Draft EIS traffic study. Also, the traffic study indicates that the impacts of convention center traffic during large events will not have significant impacts beyond the immediate intersections in the vicinity of convention center. In response to concerns expressed that other intersections could be affected, an analysis of additional intersections in the Final EIS verifies that convention center impacts beyond those intersections initially examined are relatively insignificant. We recognize, however, that the convention center is impacting an area that has significant volumes of existing traffic and that, even if the convention center were not built, traffic will continue to increase. The City Department of Transportation Services is examining this traffic situation in a more comprehensive manner through its Waikiki Regional Traffic Impact Plan. While this study is not intended to assess the impacts of the convention center, it takes into account convention center traffic, based on the EIS traffic studies.

The Draft EIS includes discussions of impacts on neighborhoods, including traffic congestion, noise (which is also technically assessed in a separate noise study in the Draft EIS), crime, the overall presence of people in the vicinity of the center, and property taxes. Also, in response to concerns about on-street parking, the Final EIS will discuss the impact of increased competition for on-street parking in the vicinity.

The Economic and Fiscal Impact Assessment in the Draft EIS noted that the City would bear the burden of providing police and fire protection, health and sanitation, and other critical government services to the new visitors and associated in-migrants for jobs that the convention center would attract. It also projected the costs of these services and indicated that the City will not benefit from property tax revenues at the convention center site because it is owned by the State. Moreover, the assessment showed that increased tax revenues generated by the convention center through the transient accommodations tax and income taxes from the visitor industry would accrue to the State and not the City. Thus, there appeared to be an inequity in the distribution of benefits and costs between the City and State.

Councilmember Andy Mirikitani
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The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of projected economic impact estimates, with two sets of assumptions establishing a "lower attendance and spending" scenario and a "higher attendance and spending" scenario including one based on a more conservative consideration of assumptions leading to the projection of economic impacts. One of the revisions in the assessment is the distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's share of the statewide TAT collection could range from \$7.3 to \$8.9 million in the revised 2008 projection. The County's net new revenue projection is also positive, ranging from \$3.6 to \$5.4 million per year in 2008.

Your concerns regarding regional traffic-related impacts with respect to the convention center are acknowledged. However, a far better forum to address this regional analysis (and avoid duplication of efforts) is the City's Waikiki Regional Traffic Impact Plan which is the appropriate study to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). As discussed in our meetings with the City Department of Transportation Services, it was agreed that the City would incorporate the traffic data from the convention center's traffic study into its regional study. Likewise, the State Convention Center Authority (CCA) will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

The findings of the EIS traffic study do not necessarily support your presumption that due to the anticipated vehicular activity at the Kalakaua Avenue/Kapiolani Boulevard intersection with the convention center, motorists will be forced to change their driving behavior and proceed to other access routes. The traffic study identifies a number of planned roadway improvements and recommended operational traffic improvements to mitigate the convention center traffic impacts. Furthermore, during the weekday AM peak traffic

Councilmember Andy Mirikitani
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period, the majority of traffic travelling to the convention center will originate from Waikiki hotels. Through establishment of a transportation management plan by the convention center's transportation coordinator, shuttle buses, taxis and vehicles from Waikiki travelling to the convention center will be directed to approach the Center from westbound Ala Moana Boulevard, and right-turn onto maukabound Atkinson Drive. By recommending that all visitor conventioners follow this travel route to and from the convention center at other times, traffic would be distributed so as to minimize traffic at the Kalakaua Avenue/Kapiolani Boulevard intersection.

The EIS traffic study demonstrates that convention center-generated traffic does not require widening of the Kalakaua Avenue bridge to provide an additional through lane into Waikiki.

The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas identified susceptible to redevelopment in the vicinity. It clearly states, however, that this impact on the neighborhood may vary, depending on what presently exists, the nature of permitted uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and

Councilmember Andy Mirikitani
July 17, 1995
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provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

With respect to considering the cumulative impacts of redevelopment, it should be noted that any major redevelopment activity in the Waikiki area will likely require an EIS. Moreover, any consideration of hotel development outside of Waikiki in the vicinity of the convention center will require rezoning or both a Development Plan amendment and rezoning. These processes will require the scrutiny of the City Council and the opportunity to impose conditions on any approvals to address specific concerns.

We acknowledge your concerns that the impacts of the convention center should be comprehensively assessed before construction begins. We feel that the Final EIS will accomplish this.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

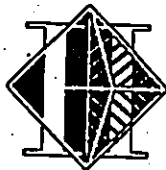
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER SIX

UTILITIES
Comments Received and Responses

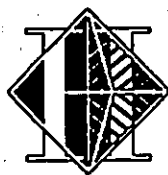


Hawai'i Convention Center

No Comment Letters Received

CHAPTER SEVEN

***OTHER ORGANIZATIONS
Comments Received and Responses***



Hawai'i Convention Center



COPY
FOR YOUR INFORMATION

Convention Center Community Network

720 Iwilei Road, Suite 314 • Honolulu, HI 96817 • Ph: 536-6671 • Fax: 531-6672

March 24, 1995

RECEIVED
MAR 28 1995

Mr. Alan Hayashi
Executive Director
Hawaii Convention Center Authority
1833 Kalakaua Avenue, Suite 800
Honolulu, Hawaii 96815

WILSON OKAMOTO & ASSOCIATES

Subject: Comments on Hawaii Convention Center Draft EIS

Dear Mr. Hayashi,

On behalf of many participants of the Convention Center Community Network (CCCN), we would like to thank you and the Convention Center Authority (CCA) for your cooperation in making the Draft Environmental Impact Statement (DEIS) process open, informative, and participatory.

In particular, we appreciate your co-sponsorship of the informational meetings held on February 12th and February 22nd, and the March 14th community input meeting, all of which were broadcast on cable television. We are also grateful for your willingness, and that of Wilson Okamoto & Associates, to address the many community questions and concerns raised in these meetings.

As you know, CCCN's Technical Evaluation Team (TET) of volunteer community professionals has reviewed the DEIS and submitted a report to CCCN's Community Leaders Group. DEIS comments from CCCN's community leaders and our TET University of Hawaii experts will be submitted directly to CCA. In this submittal, you will find comments from our other TET reviewers.

While our comments, and those of others submitted directly to you, point out major concerns regarding the DEIS, we applaud your efforts in collaborating with us to ensure that the Final EIS is the best document possible.

As a follow up to your letter of February 22, we accept your offer to jointly review the concerns raised by CCCN participants and search for concrete solutions to these problems. We suggest meeting as soon as possible so that any necessary changes can be communicated to the Design/Build Team before the mid-April design review.

With kind personal regards,


Wright Hiatt, Coordinator
CCCN Technical Evaluation Team


Jack Levin, Coordinator
Convention Center Community Network

COMMENTS ON THE HAWAII CONVENTION CENTER DRAFT EIS
Convention Center Community Network Technical Evaluation Team

I. SCOTT HAMILTON, PROFESSIONAL PLANNER

A. Emergency Management

1. The availability of the convention center as an evacuation shelter for adjacent neighborhoods in case of hurricane is good news to the community. However, there is a fault in the Molokai Channel that could lead to an earthquake perhaps damaging the three bridges into Waikiki. The Convention Center might have to serve as shelter for thousands of convention goers unable to, or forbidden to, return to their many hotels. Hence the Authority should take the emergency shelter matter very seriously.
2. As one who experienced the Good Friday Earthquake (1964) in Alaska, which broke all records, I am aware that the unexpected can happen, as most recently in Kobe, Japan. With El Nino, nothing is predictable in detail, no matter how much we plan. We must be aware that the three bridges are critical, especially if the Diamond Head end of Waikiki is flooded by a tsunami aftermath of an earthquake.
3. Convention Center authorities should meet the new Director of Oahu Civil Defense, once appointed and confirmed, to insure an awareness of the emergency management factor and continuity of purpose. Also, State Civil Defense should provide comments on the convention center project.

B. Fire Department

1. The April 6, 1994 letter from Honolulu Fire Department to Convention Center Authority stated: "We are declining to make any input at this time because of the limited amount of information available regarding the project." It is important that whoever is confirmed as new Fire Chief meet with the CCA now that more information is available a year later.
2. The accessibility of fire trucks, rescue vehicles, and ambulances to destinations in or out of Waikiki, regardless of traffic gridlock, can be a big problem. Our hospitals are located in the ewa, not Diamond Head direction. The livelihood of adequate recovery of an injured person may hinge upon the speed with which an ambulance can reach the victim and take the victim to appropriate civilian or military hospitals in the ewa direction.
3. We also know from the July 6, 1994 Woolworth fire that even a small fire in Waikiki can tie the fire brigade up for hours, if not days. Therefore, traffic flow can be critical. The fire station at the Diamond Head end of the Ala Wai Canal uses Ala Wai Blvd. for many of its fire responses.
4. Our concern is not fire-proofing of the Center but the ripple or domino effect upon the Fire Department meeting all emergencies, wherever they may be near the Center.

C. Police Department

1. The response of the Convention Center Authority on January 27, 1995 to the brief Police Department submission of March 30, 1994 is very short and to the point, but there are some items that should be added. They may have new ideas and/or comments.
2. It is expected that rapid growth and development will occur along Kapiolani Blvd. opposite the Convention Center. While we do not know what may be built—hotels, shopping center, restaurants—we do know that prostitutes, peddlers, and crime have infested the heart of Waikiki, and the same could focus on the Center project.
3. If the Authority is accurate in guessing thousands will walk to the center, steps must be taken for pedestrian safety to and from the Center, especially at the intersections of

Kalakaua and Kapiolani Avenues and Ala Wai and Kalakaua Avenues. These intersections are very dangerous now, especially when drivers ignore crosswalks. This is in addition to possible auto accidents that will cause gridlock.

4. Another Police question will be possible attempts by homeless people to use the garden area on Ala Wai Promenade behind the Center because of park benches, trees, and shelter from rain. This would be part of the domino or ripple effect of the Center development on the general area which, unfortunately, we cannot accurately estimate now.

II. HERMAN WONG, ATMOSPHERIC SCIENTIST

General Comments on Air Quality: Page 2-4 and page 2-25 indicate that the convention center will be designed to accommodate future expansion. It is not clear from reading the project description and the air quality sections if any impacts from future expansion have been evaluated. Details of future expansion should be identified as well as any associated impacts.

A. Air Quality

1. Page 2-19 identifies an emergency generator that will be located on the mezzanine level of the convention center. The emergency generator was not discussed in the air quality impact section. The following needs to be present in the DEIS: (a) generator size, (b) fuel, (c) fuel consumption, (d) operating schedule, (e) emissions, and (f) air quality impacts. Any air permit required for the emergency generator should also be discussed in the DEIS.
2. Page 3-20 presents a qualitative discussion of short term impacts related to construction activities while page 3-23 offers up daily watering to mitigate dust emissions. Before proposing the mitigation measure, emissions from construction activities, construction employee vehicles, and fugitive dust should have been quantified and evaluated to determine the level of mitigation. The following ought to be added to the EIS: (a) length of each phase of construction, (b) activities of each construction phase, (c) emissions from each construction phase, (d) impacts from construction phase, if applicable, and (e) dust barriers to mitigate dust leaving the project site.
3. From the operational side, emissions including from employee vehicles, visitor vehicles, delivery trucks, buses, taxis, vendor vehicles, and service vehicles should be quantified and assessed. The proposed operations emissions should be compared to existing and projected traffic emissions.
4. Pages 6 to 12 in Appendix E of the DEIS presents carbon monoxide monitoring data collected on November 14 & 15 and December 7, 1994. Are the two morning and two afternoon data sets supposed to be representative of the area and period? Please explain the reasoning for selecting the two days to measure carbon monoxide levels.
5. Page 20 in Appendix E of the DEIS identifies a neutral or D Stability condition used in the intersection air modeling analysis. It has been accepted that a very stable condition or F Stability would not be appropriate for an urban area, but a stable or E Stability would be acceptable. The air modeling should be revised to use an E Stability to predict ambient impacts.
6. Page 20 and 23 in Appendix E of the DEIS identifies potential violations of the State ambient air quality standard for carbon monoxide based on air dispersion modeling.
7. Page 26 provides a qualitative discussion mitigating the carbon monoxide impacts. Continuous monitoring of carbon monoxide should be conducted during convention operations to determine if violations of the air standards will occur.

III. FRANCES DELANY, PH.D. (Socio-Economic and Environmental Impacts, Long Term Considerations, and Unresolved Issues)

A. Social Impact

Section 4 of the DEIS is well-organized and presents a true-to-life picture of social impacts. Because the convention center is visitor-oriented, changes will occur which will not be agreeable to the largely residential neighborhoods. Five fundamental issues were explored: conflicting attitudes toward tourism, tourism and urbanization, tourism wages and working conditions, tourism and cultural effects. An emerging approach should be used which "includes an economy which is indigenous and self-reliant, and is based on maximum citizen participation."

Traffic remains the biggest community issue. Doubts persist that it can be managed effectively.

Although the issues of an integrated approach toward project impacts are stressed, their effects appear to be related to land use and economic results rather than to social aspects and infrastructure.

Neighborhoods will suffer a loss of ambiance if urban qualities are intensified and if land use policies are modified to allow resort facilities. There is no mention of high-rise condominiums in the Hobron-Ena area which comprise the highest residential area in the state. This represents a serious omission. Another missing datum concerns the Waikiki Neighborhood Board. The Board twice supported a motion which stated: "No convention center in or near Waikiki". This represents more than nimby. The Neighborhood Board is keenly aware of the problems within Waikiki, more so since discussions about the Waikiki Master Plan have started. This finding should have been explored.

The KPMG Peat Marwick LLP assessment concerns the economic and fiscal impacts of the convention center. ("All monetary projections are stated in constant 1994 dollars.") Some questions arise. The report states that Honolulu's existing hotel inventory is about 28,600 rooms. This underestimates current City Council numbers. Further, as a result of the convention center, KPMG asserts that 7,700 new daily room nights will be demanded. The statement that "property values can be expected to increase within the immediate area" alarms the residents who live in the immediate area. Operating expenses supplied by the state for the CCA are \$500,000 per year. This figure ought to be broken down. The assumption that daily expenditures per person at \$652 per day as reported by HVB should mention the exact date and basis for this assumption. The two sentences now quoted appeared unreal: "...this indirect and induced spending adds to the economy another \$0.77 per direct dollar spent by convention center visitors, or a total of \$2.3 billion by 2003, and about \$2.8 billion at HCC's stabilization. All together, total direct, indirect and induced spending attributable to HCC is projected to contribute \$6.4 billion to the State's economy."

B. Employment

In construction employment, "HCC will generate short-term employment during construction of the facility, and long-term employment in the operation and support of the convention center." Combining all construction employment, the study projects 690 full time equivalent positions for a 3 year construction period.

Direct operational employment will involve approximately 120 full time equivalent positions in administration, sales and marketing, housekeeping, maintenance, food service, convention crews, security, and parking. However, some additional data ought to be provided in order to compare these positions with budget requests to the Legislature by HVB, DBEDT in combination with CCA requests. Projections for year 2008, year of HCC "stabilization", call

for 2900 new in-migrant positions. Many of the interviewees stated that "visitor industry jobs pay low wages and many work under less than desirable conditions."

C. Education and Child Care

The Child Care section refers to the 1989 study by Peat Marwick Company which reported that the projected additional demand for child care was inadequate to justify an on-site day care facility. This paragraph appears outdated and incomplete. With the increased "in-migrant" population, the topic requires further study. Many workers will have children and yet because of the limited affordable housing in or near Waikiki, or because some workers may already have adequate housing at a distance from the site, it well may be that their children can be more appropriately placed in nearby schools or child care centers conveniently located near the parent's workplace. Such placements would reduce a worker-parent's stress about handling the child's daily location.

D. Recreational Facilities

This section includes parks and beaches, Ala Wai Canal, and Ala Wai Promenade. No mitigation is planned for the several beach areas although there exists a potential for crowding in the beach areas. Why not ask hotels housing conventioners to advise their guests about beach facilities? In this way problems and prospects can be discussed in a pleasing hospitable atmosphere.

The Ala Wai Canal may be used as a method of transportation for conventioners. Certainly the convention center planners or the traffic management planners must coordinate existing uses with canal users and appropriate state and city agencies. The Ala Wai Promenade, as planned, anticipates pedestrian access to the convention center. This walkway necessitates detailed attention so that any modification can be discussed with both the city and state in order to accommodate overall development plans.

E. Health Care Facilities

Personal communication with Kenneth Yoshida, State Department of Health, reads "...the project can be adequately served by existing facilities." However no plan is offered whereby ambulances can be offered immediate access. Immediate access is the sine qua non to treat effectively medical emergencies. An additional safety valve should be to arrange to employ a nurse on the site in a room containing first-aid or para-medical supplies.

F. Probable Adverse Environmental Effects Which Cannot Be Avoided

Short term effects during construction include noise, vibration, and traffic frustrations. Noise from construction will be lessened by using muffled equipment. Vibration monitoring ought to be measured frequently in and by adjacent structures. A designated person should be named to perform this service and to maintain accurate records.

Construction management should employ a traffic manager to give equal attention to project needs and neighborhood needs. As was pointed out in the February 22, 1995 public hearing, Summer Palace requires modification by the design-builder in order to achieve an orderly ingress and egress.

The long-term effects include air quality, noise, traffic, view planes and social effects. How noise emanating from the center's roof garden will be mitigated is not spelled out. In addition, potential redevelopment will further burden immediate neighborhoods and businesses. Mitigation of all these effects needs to be made public by the design-builder with proposed mitigation. Otherwise there will be a public outcry and protest.

Social impacts include changes in assessed property values, displacement and changes in demographics, and a discernible change in neighborhoods.

G. Summary of Unresolved Issues

Water quality and archaeological findings remain "unresolved". The rate of dewatering effluent may or may not have sufficient land in which it can be retained.

The State Historical Preservation Division determines whether the survey is sufficient in its findings of historic sites and resources.

H. Summary of Report

Many problems remain unsolved in connection with the convention center. Many fiscal and economic benefits appear unduly optimistic. How can the city be expected to remain silent or solvent when only negligible income accrues before 2008 (when net revenue still remains negative)? The city is responsible for many services, some of which will require further manpower; this peculiarity must be challenged and mitigated. Although in few convention centers' revenues match expenses, the projected outlook for center state that tax benefits will reach \$216 million by 2008.

Traffic is not resolved. Neighborhoods already have recognized their diminished quality of life inherent in the location. Yes, there have been public meetings, but as recently as February 22, 1995, it was clearly articulated that Summer Palace ingress and egress had not been thoroughly mitigated. In other words, people are permitted to speak openly, but they do not receive adequate explanations. Also there appears to be a paucity of knowledge about the adjacent lot consolidations and current zoning. Surely more density and construction will exponentially affect convention center access and egress.

Many mitigations have an "if" quality. This is not reassuring for the project's integrity or success.

IV. AARON M. CHANEY, CHANEY, BROOKS & COMPANY (in consultation with Wendell Brooks, Jr., Real Estate Counselor)

A. Impacts on Real Property Tax In The Surrounding Area

This assessment is based on a review of Figure #2 on a portion of pages 3 and 4 from the Convention Center's Draft Environmental Impact Statement which shows the project site and immediate and surrounding large buildings for comparative purposes.

It is our considered opinion that the construction of the Convention Center will attract developers to, and/or owners of existing properties to, consolidate and rebuild new modern residential apartment buildings either for rental and/or for sale as condos or coops. We see as potential occupants employees and/or those related to the Convention Center business, as potential residents in this area. The areas that we see as being affected would be: a) property owners in the Kahakai Drive areas, b) across Atkinson Drive to the Kalauokalani Way area, and c) Makai of the Kalakaua-Kapiolani Boulevard intersection. Additional areas we see as benefiting from the Convention Center are those in the area located Mauka of Kalakaua and Kapiolani Boulevard where smaller properties may be consolidated and larger residential buildings be constructed thereon.

We do not see an immediate increase in real property values, but will start to see the increase as the project nears completion, i.e. two years hence.

In addition to the enhancement of values, nearby commercial properties lying between Kona Street and Kapiolani Boulevard will start to feel the effect of increasing values and the need to redo and/or demolish and rebuild buildings on those lots.

With respect to existing properties, i.e. condominium projects, we do not foresee as great an increase in the real property values as there would be for those properties where buildings will be demolished and new buildings placed thereon.

V. WRIGHT HLATT, CONSTRUCTION ENGINEER

A. Traffic/Parking Impacts

The traffic/parking problems associated with the Hawai'i Convention Center, result from the legislative finding that it "is presented with the capacity to act in synergy with the surrounding uses", and that the site is "easily accessible".

Three exhaustive studies in recent years by the best qualified traffic engineers available establish the fact that traffic problems may be mitigated, but not solved. And the City and County of Honolulu is proceeding with another study exploring other alternatives and regional implications.

Mitigation by widening Kahakai Drive with two additional lanes and adding one lane to both Kalakaua Avenue and Kapiolani Boulevard will result in an "undesirable" level of service at that intersection in 1998 for a 10,000 person convention. And traffic studies indicate that a 14,000 person convention would cause traffic at that intersection to exceed its capacity. It is significant that most recent studies do not go beyond 1998, the first operating year of the Center; and no studies address expansion of the Center, as may be required by law.

The capacities of bridges over the Ala Wai Canal receive scant attention. Is there a limit to their capacities? If so, what are the implications?

The traffic studies appear to emphasize access to the Center. Egress studies might divulge important information on such subjects as vehicular turn-around, storage, and parking. The estimated costs of mitigation should be mentioned.

With regard to access and egress, including during emergencies, helicopter and waterborne services deserve more attention.

The possibility of development of a rapid transit system, as included in the Primary Urban Center Development Plan Ordinance, should be more thoroughly explored.

The interior vehicle, and pedestrian, flows — access, egress and parking — need more study, especially with regard to large events. And the figure of 800 parking stalls needs to be explained and justified. Apparently that number of stalls will only support a local event of 1800 attendees.

In summary, the wisdom of developing a center with such serious traffic problems, even with proposed mitigation, may be open to question.

B. Flooding and Drainage Impacts

The Convention Center Authority (being the Applicant) has established the flood elevation at the site, of +7.0 feet above mean sea level (msl). The msl referred to is about +1.0 feet above the zero on the Honolulu Harbor gage—the datum. It is also of interest that daily fluctuations between highest and lowest tides annually range from -0.4 ft. and +2.6 ft. on that datum. Question: Has the Federal Emergency Management Agency concurred in this decision?

Why has there been no "base flood" determined at the site?

Will CAA have to pay flood insurance? If so, how will it be calculated, and to whom paid? It is suggested that a flood damage assessment study be made, and included in the final EIS.

Drainage impacts may trigger a permit under the federal National Pollution Discharge Elimination System (NPDES) in connection with the City and County drainage permit. More information is needed as to how such a contingency would be handled.

The statement that "...no new drainage outlets into the Canal will be needed" is misleading. Whether or not existing and proposed drainage will meet national standards should be more fully addressed.

If not already done, it is suggested that Volumes I and II, of the DEIS be provided to: Environmental Protection Agency, P.O. Box 50003, Honolulu 96850; and U.S. Army Corps of Engineers, District Engineer, Building 230, Attn: SEPOH-DE, Fort Shafter, Hawaii 96858-5440.

C. Communications

To attain optimum "marketability", the Convention Center will need a "state of the art" businesses service center to accommodate national and international conventioners.

As stated in the GTE Hawaiian Telephone Book, the Center should provide international data transmission, pager services, conference calling, and national and international video conferencing, and an adequate number of telephone booths.

The businesses service center should be located on the Meeting Rooms floor, and should be large enough to accommodate the highest quality telephone, computer, video monitoring, language translation and secretarial services, world wide. An international banking and currency exchange may prove to be needed.

D. Construction Impacts

The construction impacts presented on page 55, of Annex "G", need to be expanded with more specific information:

1. Insert a Project Construction Schedule at page 55.
2. Table 6-1 — "Required Permits and Approvals" should be expanded, to show the estimated dates of submission for each permit application, and estimated period allowed for approval.
3. Amplify the implications of the possibility of having to apply for a Sec. 4, NPEDS permit.
4. Identify approximate chronological sequence of major elements of the project: street widening, sanitary sewer construction, foundation, exhibition floor, mezzanine, parking, meeting room level, ballroom, kitchen, and roof top garden, plus installation of major mechanical and electrical equipment. Relate this to item #1, above.
5. When will dustiest and noisiest periods occur, and at what duration?
6. A chart showing projected monthly construction manpower should be provided, showing when peak will occur.
7. Describe provable occurrences of most serious traffic impacts caused by delivery of construction materials and equipment, including long piles, large machinery, concrete, steel, and truss deliveries.
8. The "construction cost" of \$168,120,000 shown on Exhibit 1-A, Appendix H, needs more explanation than that shown at note (2) of the Exhibit; and the \$31,880,000 difference between the construction cost and NORDIC's \$200,000,000 needs explanation.
9. There will be two large separate and discrete projects involved in mitigation for wastewater and traffic, each will cost millions of dollars:

The new 24-inch sanitary sewer from the Center, makai along Atkinson Drive, and crossing Ala Moana Blvd., east of the Atkinson/Ala Moana Blvd. intersection--1600 feet long.

For traffic mitigation, Kahakai will be widened from 2 lanes to 4, and a new additional lane on the Diamond Head side of Atkinson, plus the makai side of Kalakaua Avenue, to the Ala Wai bridge, will be built.

Both of these major public works need to be discussed in greater detail with regard to their impacts, mitigation, costs and duration.

E. Economic Impacts

This Appendix to the DEIS provides the economic justification for the development. It is based on development and operational assumptions provided by the Convention Center Authority, Hawaii Visitors Bureau, the Tax Foundation, research by Peat Marwick, and the use of a "Regional Input-Output Model (RIMS) Multipliers for Honolulu County", as developed by the US Bureau of Economic Analysis (BEA)". That model is used to calculate direct, indirect and induced estimates of labor, benefits (revenues), and costs resulting from the \$200,000,000 development.

Sixteen tables are presented addressing: direct, indirect, and induced employment, populations, conventioners, tax revenues--both for the State and City and County.

It projects that in the first full year of operation (1998) new costs to the City will amount to \$5.3 million, with revenues amounting to \$2.0 million, giving a negative benefit/cost ratio. Ten years later (2008), those respective figures will be new costs of \$12.7 millions, and benefits of \$13.10 million for a benefit/cost ratio of 1.03.

For the State, corresponding figures in millions, are projected as:

	<u>1998</u>	<u>2008</u>
New revenues	90.0	215.9
New costs	54.1	69.9
Benefit/Cost Ratio	1.7	3.1

The study predicts a need for 7,700 new hotel rooms, and an addition of 14,700 new visitors to Honolulu population count by the year 2008. And the total effect of direct, indirect, and induced spending attributable to the Convention Center is projected to be \$6.4 billion to the Hawaiian economy.

In addition to another, more realistic, "second opinion" type economic assessment of the development, it is suggested that the final EIS contain specific, appropriate, and pertinent annual economic and fiscal data from comparable existing convention centers, showing trends in the convention center industry.

VI. BEN TORIGOE, PROFESSIONAL PLANNER

- A. **Flooding:** Plans should show section of building proposed and site from Atkinson Drive to Ala Wai Promenade/Canal to show relative level of flooding to occur.
- B. **Botanical:** "...relocated and replaced by trees of the same species and size..." contradiction of terms/words - cannot do both - protective barrier? or what about irrigation?
- C. **Archaeological, Cultural and Historic Resources:** Last paragraph/2nd sentence - how and where does it do it? "...enhance public usage of the promenade and to maintain its aesthetic appeal." How does design enhance "cultural and historic resources"?
- D. **Scenic and Visual Resources/Urban Design:** Ala Wai Canal/Promenade up & down Canal to Ala Wai basin and Ala Moana Park. View overlay of proposed buildings over panoramic views were not panoramic in exposure, and as such seemed very selected? And seemed also questionable concerning the objectivity of its analysis.

- E. **Traffic:** Very questionable concerning the appropriateness and adequateness of the drop-off for taxis and buses off Atkinson Drive.
- F. **Utilities:** All conservation means/methods to be incorporated: water conservation fixtures? sewerage reduction mean? gray water recycling/reuse? roof/surface water run-off recycle/reuse?
- G. **On-Site Catchment/Retention Prior to Discharge: Impacts/Construction Period:** The use of "may" in the first paragraph seems too uncertain concerning the extent of work/scope of work involved for construction of the facility, especially the last sentence "...which may include measures such as detention basin..."
- H. **Solid Waste:** There is an impact that the center will have however no impact is stated. Very questionable concerning "recycle" food "waste". Food bank alternate disposal of "good food", with "a refrigerated room for holding food waste." HCC management/recycling policies/programs facilities available but no workers/policies/programs.
- L. **Recreational Resources:** (Ala Wai Canal/Promenade, Ala Moana Beach) There will definitely be some kind of impact on these immediate areas/resources contrary to what the DEIS may attempt to say. It is not very objective to make the statement that there would be no/minimal impact. Where is the justification/analysis to produce such a conclusion?



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Wright Hiatt and Mr. Jack Levin
Coordinators
Convention Center Community Network
720 Iwilei Road, Suite 314
Honolulu, Hawaii 96817

Dear Mr. Hiatt and Mr. Levin:

Subject: Hawaii's Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Scott Hamilton, Professional Planner

A. Emergency Management

1. The Convention Center Authority takes very seriously the role that the convention center may have in providing emergency shelter for the public. Nevertheless, the agency primarily responsible for emergency management in Honolulu is the Oahu Civil Defense Agency. The CCA is coordinating with this agency, as well as the State Civil Defense Agency to determine the appropriate role of the convention center in an emergency.
2. Your comment would more appropriately be addressed by the State and Oahu Civil Defense agencies mentioned. Such disaster management goes well beyond the scope of the CCA's authority.
3. The CCA has been in contact with both the Oahu and State Civil Defense Agencies since they provided comments in the consultation phase of the Environmental Assessment. Design features for use of the convention center as an emergency shelter have been incorporated as a result. Both agencies were invited to comment on the Draft EIS.

B. Fire Department

1. The Honolulu Fire Department was provided with a copy of the Draft EIS and invited to provide comments. In addition, the project designers have been in consultation with the Fire Department regarding issues of fire safety.
2. We concur that the movement of emergency vehicles into and out of Waikiki is critical. The EIS traffic study demonstrates that the impacts of convention center-related traffic during peak commuter hours can be mitigated to levels comparable to maintaining the project site as a vacant lot. Nevertheless, background non-convention center-related traffic levels are already high and increasing during various times of the day and night in and around Waikiki. The City Department of Transportation is examining regional traffic concerns in the vicinity through its Waikiki Regional Traffic Impact Study. Only through such a comprehensive analysis can the situation be understood and addressed. The CCA will provide data on convention center traffic for incorporation in the study and will continue to participate in the study's task force.
3. Same response as No. 2, above.
4. Same response as No. 2, above.

C. Police Department

1. The Police Department was provided with a copy of the Draft EIS and invited to comment. In a letter dated March 20, 1995, the Department commented that, "You have responded adequately to our concerns in Volume II about traffic, parking, security, etc." They had no further comments to offer.
2. We concur that future development along Kapiolani Boulevard cannot be predicted. The social impact assessment discusses the potential impacts of the convention center in relation to crime. This

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discussion has been expanded in the revised social impacts assessment in the Final EIS.

3. We wish to clarify that the majority of convention center pedestrian traffic originating from the area of Waikiki hotels (via Kalakaua Avenue or Ala Moana Boulevard) is anticipated to enter the Center from the Ala Wai Promenade, and not from the Kalakaua Avenue/Kapiolani Boulevard intersection. Also, the pedestrians crossing Ala Wai Boulevard at Kalakaua Avenue would most likely be walking on the makai side of Kalakaua Avenue (based on hotel locations). It is noted that the makai leg of Ala Wai Boulevard at the Kalakaua Avenue intersection does not incur heavy traffic movement. Furthermore, most all legal crosswalks in the area are signalized and should be obeyed by both pedestrians and motorists. As deemed necessary, traffic control personnel would be stationed at major access points at the convention center to facilitate safe pedestrian and vehicular access. In regard to your concern, we note that traffic accidents are considered extreme occurrences and could occur even without the convention center, resulting in increased traffic congestion.
4. You raise the concern about the possibility of homeless people using the Ala Wai Promenade adjacent to the convention center. We emphasize, however, that it would be in the best interest of the convention center to ensure that problem activities do not occur in the immediate vicinity of the Center's premises. The reputation of the convention center is dependent on maintaining the integrity of the facility. 24-hour security at the convention center will be provided to curtail illegal activities.

Herman Wong, Atmospheric Scientist

The construction timing and design details for the future convention center expansion is uncertain at this time. Air quality impacts associated with the expansion will result from a potential increase in traffic since the expansion could accommodate a larger single event or more multiple events.

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While the expansion would likely result in an increase in vehicular emissions, a thorough quantitative study on the level of impact would need to be based on a specific expansion proposal as well as an opening date to project background traffic conditions. Neither of these is available at this time. A subsequent environmental impact disclosure document prepared pursuant to the Hawaii EIS Law will be required for the proposed expansion before it could be constructed. At that time, a new air quality study should be prepared.

A. Air Quality

1. The air quality study in the Final EIS has been revised to include a discussion of the emergency generator. The 1,500 kilowatt diesel-fired generator is proposed as an emergency backup power source. Its actual operation and, thus, its emissions, would be minimal since, except for emergencies, it would only be tested for one to two hours per month. The generator will require a State Department of Health Permit pursuant to the recently promulgated Chapter 11-60.1 air pollution control regulations. In order to obtain that permit, the applicant will need to demonstrate and certify annually that operation of the generator will comply with all applicable air pollution control requirements and standards.
2. With respect to vehicular emissions during the construction phase, it is generally anticipated that construction employees will be on-site and working before the a.m. peak traffic hours. Employee departures will typically begin before the p.m. peak traffic hour, but may overlap the early part of the hour. Hence, vehicular emissions by commuting construction employees is not anticipated to be a major contributor during peak traffic. Moreover, the number of vehicular trips associated with construction employees at major intersections is anticipated to be extremely small compared to the number of vehicles that will pass through those intersections.

Estimating the fugitive dust from a construction site is, at best, a very crude process. The Environmental Protection Agency (EPA) emission

factor was presented in the Draft EIS to provide some quantification. Several dust control measures will be implemented by the design/builder from the outset of construction. These measures include placing a gravel working surface over the entire site; frequently watering exposed dry soil areas, particularly heavily travelled areas within the site; covering trucks hauling materials that could generate significant amounts of dust in transit to or from the site; installing landscaping as soon as possible on completed open areas; and, if necessary to comply with DOH rules, erecting dust screens to protect nearby low-level properties.

3. The vehicular activity cited is included, for the most part, in the traffic impact assessment report which was the basis of the air quality impact report. Delivery trucks and service vehicles would generally access and depart from the site during off-peak traffic hours and would not contribute to the peaks in vehicular emissions.
4. The carbon monoxide sampling data collected during peak hours at the Atkinson Drive and Kalakaua Avenue intersections with Kapiolani Boulevard were intended to provide some "real" on-site data, albeit limited, for comparison with the peak-hour modeling results and nearby monitoring. The results were within the same range as measured at the Department of Health's Waikiki monitoring station and lower than the worst case model predictions due primarily to the greater than one meter per second wind speeds occurring during the sampling.
5. The air quality impact study utilized the EPA-recommended stability "D" (EPA-454/R-92-005), and we are unaware of any published guidelines recommending otherwise. Nevertheless, to follow-up on the recommendation to use stability "E" in the model, it was discovered that the all of the a.m. runs inadvertently used stability "F." Utilizing stability "E" reduced all maximum 1-hour and 8-hour concentration estimates. The revised air quality impact study in the Final EIS will include an

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analysis based on stability "E" for comparison purposes.

6. The air quality modeling results suggest the potential for violations of the State carbon monoxide standards under worst case conditions both at the present and in the future with or without the convention center. The probability of such violations actually occurring, however, would appear to be low based on monitoring data. Under normal meteorological conditions, no violations would be expected.
7. Monitoring carbon monoxide levels during convention events would not necessarily identify air quality concerns associated with convention center traffic. As discussed above, projected worst case conditions are related primarily to meteorological conditions and existing traffic rather than the marginal contribution of traffic associated with the convention center.

Frances Delaney, Ph.D.

A. Social Impact

We are pleased that you found the social impact assessment (SIA) to be well-organized and true-to-life. We acknowledge your support of the emerging suggestion from environmental interests that Hawaii's economy should be one that is "indigenous and self-reliant, and is based on maximum citizen participation." The SIA identified this suggestion as a counter-point to the conventional "growth-is-good" mentality which some may suggest drives the convention center project. The EIS is not intended to serve as a forum for debating the merits of either view but to disclose that these views are held by the community. With respect to citizen participation, the EIS process as well as the efforts of the CCA to augment legal requirements for public participation have clearly demonstrated our intent of facilitating citizen input.

We concur with your comment that doubts persist about the efficacy of our proposed traffic impact mitigation measures. Nevertheless, we are confident that the EIS traffic studies are appropriate and that their findings

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are correct. The problem resides in the public perception that the traffic problems are insolvable and our inability to educate the doubting public. Because traffic acceptability is based on individual emotional standards it is a difficult subject to discuss. However, the CCA will continue to dialogue with the public to attempt edification.

We do not clearly understand your comment about the "integrated approach." By nature, the various technical studies would rely on different approaches and methodologies. To a large extent, the social impact assessment addresses the community perception of the various issues addressed by the technical studies but the studies themselves are independent analyses. We note that the Draft EIS specifically addresses infrastructure impacts. Other comments received on the Draft EIS have indicated that some of the projections in the economic and fiscal impacts assessment, including new hotel room construction and in-migration, could be more clearly assessed in the social impact assessment. Toward addressing such comments, both the economic and fiscal assessment of the social impact assessment have been revised to better integrate their findings.

Your comment regarding the impacts of land use policies allowing resort uses is acknowledged. The social impact assessment in the Final EIS addresses the consequences of such uses particularly in the immediate vicinity of the project site and discusses potential mitigation, including revision of land use policies to disallow resort development.

Your observation that "high-rise condominiums" were not mentioned in page 49 of the Social Impact Assessment is correct. Although specific residential structures were named previously on page 12, the reference to those structures as high rise condominiums was inadvertently omitted. This error will be corrected in the Final EIS.

Also inadvertently omitted was information about the Waikiki Neighborhood Board's position on the convention center. The research of the Board's minutes between January 1993 and January 1995, however, did not indicate that they supported a motion for "no convention center in or near Waikiki." On August 3, 1992, the Board voted to

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oppose a convention center at the Hobron Lane area, and voted to support a convention center at the Ala Wai Golf Course site. The latter site is near Waikiki and would be supported by visitor facilities across the Canal. This information will be included in the Final EIS.

Based on comments received on the Draft EIS, the economic and fiscal impact assessment was revised for inclusion in the Final EIS. According to the revised assessment, Oahu's reported 1994 hotel inventory is about 28,414 rooms, excluding condominiums, condominium-hotels, apartment, bed and breakfasts, hostels and other non-hotel accommodations) The count in the Draft EIS was based on the 1993 Hawaii Visitor Bureau Plant Inventory, the most recently available data at the time the research was conducted.

The statement that property values in the vicinity of the convention center are expected to increase could also be favorably viewed by landowners. This impact is discussed as a cumulative effect in the neighboring area of the convention center in the social impact assessment of the Final EIS.

The \$500,000 per year estimate for State costs to operate the convention center authority was provided by the CCA. It is an annual estimate and is not broken down. However, CCA annual reports are available since 1989 at the Legislative Reference Bureau or from the CCA. The State has approved funding for the CCA through 1997, at which point the legislature must again approve funding for the continued operation of this office. For the purposes of the economic and fiscal impact assessment, it was assumed that the State will continue funding the CCA or some other State entity to continue its marketing and business development functions for the convention center.

The key source of data for the daily expenditure rate is from the HVB. Based on comments received on the Draft EIS, additional research was conducted to determine if expenditure rates for other convention centers corroborated HVB'S figures. Two scenarios were formulated, corresponding to a high and low spending rate, respectively. The following discusses the formulation of the spending rates in the two scenarios.

Convention visitors are associated with significantly more spending than the average visitor to Hawaii, since costs of the convention, entertainment and promotional items are added to their daily personal expenditures. In estimating a range of expenditures per person, reviewed were Hawaii Visitors Bureau (HVB) surveys on the meeting and convention markets as reported in its Visitor Expenditure Reports for 1991, 1992, and 1993, which are the most recently available. The HVB data shows that in 1993, westbound meeting and convention visitors spent \$617 per person per day while eastbound meeting and convention travelers spent \$720.

To those familiar with typical spending patterns for other visitors to Hawaii, these figures may seem high. That is because, in addition to the money spent by each delegate or exhibitor, the sponsoring groups typically spend an even greater amount in the State (noted as "supplemental" spending by the HVB). In the economic assessment, these supplemental business expenditures, which occur in Hawaii and may be spent by the event organizer or other sponsors, are averaged over all delegates and exhibitors and their entire length of stay in the State. According to the HVB, these supplemental expenditures include the following:

- Hospitality activities (suite, food, beverage, service, tips, etc.)
- Business entertainment/business meals;
- Cost of exhibit space;
- Local drayage/storage;
- Local audio/visual materials and equipment;
- Ancillary services (telefaxing, duplicating, printing, secretarial, etc.)
- Union labor for exhibit set-up;
- Promotional or give-away items purchased locally;

For 1993, the HVB reported the following expenditure data on meeting and convention visitors to the State:

<u>Westbound Travelers:</u>	<u>Personal</u>	<u>Suppl.</u>	<u>Total</u>	<u>% Mix</u>
Convention Delegates	\$ 152	\$ 406	\$ 558	76%
Corporate Mtg. Delegates	<u>202</u>	<u>602</u>	<u>804</u>	<u>24%</u>
Weighted Average	\$ 164	\$ 453	\$ 617	100%

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Eastbound Travelers:

Convention Delegates	\$ 236	\$ 406	\$ 642	72%
Corporate Mtg. Delegates	<u>320</u>	<u>602</u>	<u>922</u>	<u>28%</u>
Weighted Average	\$ 260	\$ 461	\$ 720	100%

Source: Hawaii Visitors Bureau, Visitor Expenditure Report, 1993

For the future, westbound visitors were estimated to represent 85% of delegates for exhibitors, and eastbound visitors 15%. This results in the weighted average expenditure per day for all delegates or exhibitors of \$632 in 1993 dollars or an estimated \$652 in 1994 dollars.

In the future, average spending per capita could be lower than historically, since the State is anticipated to attract larger events. Also, after reviewing data on supplementary expenditures per capita at New Orleans and Orlando convention centers, the \$650 benchmark was adjusted downward as follows:

	Personal	Supplemental	Total
Benchmark*	\$182	\$468	\$650
Scenario I: Adjustment from benchmark Projected Spending	<u>100%</u> \$182	<u>(40%)</u> \$238	\$465
Scenario II: Adjustment from benchmark Projected spending	<u>100%</u> \$182	<u>(20%)</u> \$373	\$555

* Based on 1993 data on Hawaii meeting and convention visitor spending, inflated to 1994 dollars at 2.8% and assuming a mix of 15% eastbound visitors and 85% westbound visitors.

Thus, the economic impact assessment assumes that supplementary expenditures are about 20% to 40% less than observed historically in Hawaii, while personal expenditures for delegates/exhibitors and attendees remain the same at \$182 per day. This results in an average total per delegate/exhibitor expenditure of \$465 to \$555 per day, in 1994 dollars. This range is used as

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a basis for the assessing of the low (Scenario I) and high range (Scenario II) economic impact, respectively.

As a result of the adjustment in expenditure rates, the total effect of direct, indirect and induced spending have been revised in the economic and fiscal impact assessment for the Final EIS. The following describes how this total is derived:

As the convention center reaches stabilized levels of operations, bookings are expected to amount to about 60 events per year, averaging from 6,200 to 7,500 delegates and exhibitors at each event, as projected by the CCA.

Direct spending by visitors attracted by events at the convention center are projected to impact the State as follows:

- Spending by or on behalf of convention delegates and exhibitors was discussed previously, and is projected to average between \$465 and \$555 per delegate per day in 1994 dollars, for Scenario I and II.
- Based on an average length of stay of about 8.14 days, direct annual visitor spending due to Center attendance is projected to amount to nearly \$1.3 to \$1.8 billion by the 2008, for Scenario I and II, respectively.
- Indirect and induced spending adds another \$0.77 to the economy per direct dollar spent by convention center visitors. (Indirect spending represents expenditures in the State by businesses that benefit directly from direct expenditures. For instance, the hotel operator that gains occupancy may purchase more proteas than previously from a farmer on Maui. Induced spending represents the re-spending of earned income throughout the State's economy by employees or proprietors of businesses that benefit from direct or indirect expenditures. For instance, a hotel worker may use her income to purchase groceries near her home in Mililani.)

- The total effect of direct, indirect, and induced spending attributable to the Center is projected to range as follows in the year 2008:

Projected Annual Visitor Expenditures Attributable to the Convention Center: Statewide, 2008 (1994 dollars, in millions)		
	Scenario I	Scenario II
Direct expenditures *	\$1,648	\$2,331
Indirect and induced	\$1,269	\$1,795
Total (rounded)	\$2,918	\$4,125

* Net of lost spending by potential displacement of visitors out-of-State and the existing Oahu meeting capacity.

B. Employment

In both the earlier and revised economic and fiscal impact assessment, direct operational employment at the convention center was estimated at 350 full-time equivalent (FTE) jobs, as provided by the consulting firm of Group 2+ International of Bellevue, Washington. Group 2+ International is the operations and food service consultant to the CCA, and was engaged by the CCA to provide such consultation. This total is broken into approximately 120 FTE positions in areas such as administration, management, sales and marketing, housekeeping, maintenance, food services, conversion crews, security and parking. In addition, there is likely to be an on-call food service staff of approximately 230 FTE positions, for a combined total staff of about 350 FTE employees. It is likely that the State will contract a private management team to operate the facility, and that food services will also be subcontracted.

While many consider visitor industry jobs to offer low pay and to provide less than desirable conditions, data indicate that persons continue to move to the islands to take such jobs. Perhaps many are attracted by the relatively low levels of training required of such jobs, and for others, in comparison to opportunities in their

place of origin, our visitor industry jobs are attractive.

C. Education and Child Care

It should be clarified that the projected 2,900 new immigrant jobs would be created throughout the visitor industry, including on the Neighbor Islands as a result of vacationers from Waikiki displaced by convention delegates, or by pre- and post-convention vacationing by delegates. If child care facilities were to be provided for such workers, they would need to be considered on a Statewide and industry-wide basis, as opposed to the role that the convention center could play.

The 1989 study was provided as a comparison between the employment created at the State's presently proposed "stand alone" convention center and the private convention center complex proposed in 1989. The previous proposal included an 800 room hotel as well as an office building, retail center and 800 condominium units, all of which would have created significantly greater employment and residential opportunities on-site and raised the question of whether or not a child care center within the complex would have been necessary. The employment projection on-site for the previous proposal 1,910 jobs by 1997. By comparison, the current proposal projects 350 full-time equivalent jobs. Moreover, the current proposal has no associated residential uses for which child care needs were also considered in the 1989 study.

The CCA's operator will be directed to investigate the delegates requirements as to partial child care during attendance at the convention. If the program can be expanded to incorporate employees child care economically the CCA may agree to do so in the future.

D. Recreational Facilities

Your suggestion for hotels advising convention delegates of beaches they could use may be an appropriate solution if overcrowding becomes a concern. Hotels could do this as a service for their guests.

The present design of the convention center would not preclude waterborne transit for convention delegates. In

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addition to working out potential conflicts with other users of the canal, the canal itself would need to be dredged to allow freer movement of vessels, and the impact of the facilities on the historic character of the Canal would need to be considered. With respect to improvements on the Ala Wai Promenade to accommodate pedestrian use, the design/builder continues to be involved in discussions with both the State Historic Preservation Division, the City Department of Parks and Recreation, the City's Exceptional Tree Committee and the Outdoor Circle.

E. Health Care

Emergency health care for persons at the convention center is not discussed as an impact of the convention center; however, as discussed in the Project Description, there is a first aid room and provision for emergency vehicle access near the security command center which has direct elevator access to all levels of the convention center.

F. Probable Adverse Environmental Effects Which Cannot Be Avoided

To minimize risks of potential damage due to vibration from pile driving, a program to detect potential damage to neighboring buildings will be implemented. This will involve extensive documentation of existing building conditions using still photography and video recordings. All visible damage such as cracks in walls and slabs will be documented as a basis for identifying any new damage that may be associated with vibrations from pile driving. In addition, electronic surveying equipment capable detecting minute shifts in reference points to be established on the buildings will be utilized to determine if building foundations are being affected. A monitoring program for these electronic surveys will be established to provide early detection of any impacts such that pile-driving activities can be halted and modified, as necessary. The design/builder will be responsible for any damages to neighboring buildings that are attributable to pile driving or other construction activities.

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The design/builder will have full-time traffic control for all deliveries to the site.

Noise from rooftop activities will need to comply with Department of Health noise standards. To comply with these standards, the Draft EIS recommends against gatherings in excess of 10,000-persons and use of sound amplifying equipment unless sound attenuating measures are employed.

The social impact assessment identifies and discusses potential impacts and concerns related to redevelopment that may be accelerated or induced by the convention center. Additional discussion of potential mitigation measures will be included in the Final EIS, although implementation of such measures may be beyond the authority of the CCA.

The social impacts you identify have been discussed in the social impact assessment.

G. Summary of Unresolved Issues

Water quality issues related to construction dewatering are technically unresolved since the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activity Dewatering has yet to be approved. The permit application, which has been filed with the Department of Health (DOH) offers a BMP plan that eliminates the need to discharge dewatering effluent except, possibly, during heavy or prolonged storm events. Hence, the permit is requested only for emergency discharges during such storm events. To avoid discharging the effluent, retention basins, which may include excavations needed for construction, will hold the effluent until it can percolate back into the ground. In the event of a large or prolonged storm, the retention basins will serve as detention basins, holding the effluent long enough to allow sediments to settle out before it is discharged. Other required sediment reduction methods include lining excavations with filter fabrics to reduce the amount of sediment entering the effluent and using filters on intake lines.

Pending incorporation of laboratory analyses findings for core samples, the completed archaeological inventory

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survey will be submitted to the State Historic Preservation Division, probably in July, 1995.

The Final EIS will include discussions of additional unresolved issues that have been identified in the public review phase of the Draft EIS.

H. Summary of Report

We acknowledge that there are several concerns that remain unresolved, some of which need to be formally addressed by agencies issuing permits or approvals required for the project. Most of these issues have been identified in the Draft EIS and further clarification will be provided in the Final EIS.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

One of the revisions in the assessment is the distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's revised share of the statewide TAT collection could range from \$7.0 to \$8.9 million in the revised 2008 projection. The County's net new revenue projection is also positive, ranging from \$3.6 to \$5.4 million per year in 2008.

The intent of the traffic studies in the Draft EIS is to identify the impacts of traffic generated by the convention center on significantly affected intersections, recommend potential mitigation measures and assess their effectiveness. The CCA has endeavored to explain the findings of these studies at various public informational forums, however, our observation is that they have been met with skepticism. In response to various comments received on the Draft EIS, supplemental analyses of traffic have been prepared which additionally

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support the findings of the earlier traffic studies. These include an analysis of additional intersections to demonstrate that the significantly affected intersections have been addressed in the earlier studies, as well as a year 2005 analysis to identify considerations in the growth of background traffic that could affect traffic in the vicinity in the future.

The "paucity of knowledge" about the development of property in the vicinity of the convention center you refer to is an acknowledgement in the Draft EIS that future decisions by both private developers and the City Council in granting entitlements for development, cannot be predicted with any certainty. Hence, the social impact assessment in the Draft EIS identified "areas susceptible to development" and assessed the impacts of potential redevelopment scenarios, without considering when they might be developed, if at all. Traffic associated with potential future development is addressed in the new year 2005 traffic assessment. This assessment considers the growth in traffic associated with overall development in the region. It uses a growth factor derived in consultation with the City Department of Transportation Services which is preparing the Waikiki Regional Traffic Impact Study. For longer term traffic projections, such as to the year 2005, using the growth factor is a more appropriate than speculating if any particular parcel of land would by then be developed with a particular type of land use.

The EIS process requires the discussion of potential mitigation measures as well as the identification of those which will be implemented. Implementation of some of these measures is beyond the authority and responsibility of the CCA and the design/builder. It should be realized that the EIS is intended to disclose information about the impacts of the project, not necessarily to assure that all potential impacts will be mitigated.

Aaron Chaney, Chaney, Brooks & Company

A. Impacts of Real Property Tax in the Surrounding Area

The comments provided are generally consistent with the findings of the social impact assessment in regard to the

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opinion that "the Convention Center will attract developers to and/or owners of existing properties to, consolidate and rebuild new modern residential apartment buildings..." The social impact assessment provides a full discussion of the projects neighborhood impacts in Section 4.2. Figure B in the social impact assessment delineates those parcels which are likely to develop and the areas cited in the comment are included in the analysis.

The opinions regarding the increase in property tax analysis is acknowledged and, while they are perhaps more speculative than is deemed appropriate for discussion in the social impact assessment, we do not disagree with them. The social impact assessment discusses the general social effects on neighboring businesses and residents if taxes were to increase.

Wright Hiatt, Construction Engineer

A. Traffic/Parking Impact

We acknowledge your reference that the traffic/parking problems associated with the convention center result from the legislative finding that it "is presented with the capacity to act in synergy with the surrounding uses", and that the site is "easily accessible." While it would seem ideal to base the selection of the convention center site on factors such as traffic, parking and accessibility and other factors, the opportunities available at any given time vary considerably. Considerations such as the amount of land available and its implication on design, as well as acquisition costs and the need to condemn private property must also be taken into account. The Aloha Motors site is the most studied of all of the sites considered, inasmuch as a much denser convention center complex was proposed and approved there by the City Council.

Your comment that the three studies in recent years by the best qualified traffic engineers establish the fact that traffic problems may be mitigated, but not solved is acknowledged. The purpose of the EIS traffic study is to mitigate convention center traffic impacts to conditions which would be comparable to that without the convention

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center. On the other hand, the City's Waikiki Regional Traffic Impact Plan has a broader responsibility to address the overall traffic congestion in the study region.

The proposed widening of and traffic signal at Kahakai Drive will improve the Kahakai Drive access at Atkinson Drive to a minimum acceptable level of service. The proposed traffic lane widening along Kapiolani Boulevard fronting the project will increase the capacity of the Kalakaua-Kapiolani intersection to accommodate convention center traffic during both the 10,000-person and 14,000-person events.

Based on comments received from the City Department of Transportation Services, a projection of traffic conditions to the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City Department of Transportation Services and pursuant to the City's Waikiki Regional Traffic Impact Plan.

Also, due to the uncertainty of the time frame for future expansion of the convention center, a supplemental EIS would need to be prepared when the decision is made to pursue such expansion. A traffic impact analysis would need to be conducted for the supplemental EIS. Such analysis could consider the findings of the Waikiki Regional Traffic Impact Plan being prepared by the City and any resulting traffic improvements that may have been implemented.

The EIS traffic study does not indicate that bridge widenings or additional vehicular or pedestrian bridges across the Ala Wai Canal are necessary to mitigate the additional flow of vehicular or pedestrian traffic, respectively, generated by convention center operations. Should non-convention center-related traffic continue to grow after the Center is completed, however, the City may consider vehicular bridge widenings or additional bridges

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for traffic in the future. A pedestrian bridge, though not essential to accommodate those walking to the convention center from Waikiki, could enhance and facilitate access and may also be considered in the future. If such facilities are desired in the future, the proposing agency would need to comply with the appropriate Federal and State requirements for proposing modifications on historic properties.

The EIS traffic study analyzes vehicular access to, as well as from, the convention center. In designing the convention center, the project architects have taken into account internal vehicular circulation within the facility's parking garage, truck dock area, and the main entry drive area fronting the lobby to ensure efficient flow in operations. For example, the internal layout of the parking garage is being designed to ensure that vehicles traversing through the drive aisles will not affect the ability of vehicles to enter the garage without any impedance, potentially resulting in queuing back onto the street. At the end of an event, traffic control personnel could be stationed within the parking garage to direct the flow of vehicles out onto the exit ramps and onto the adjacent streets. The convention center's loading dock is designed to allow for simultaneous in-and-out traffic movement with provisions for a turnaround area, thus minimizing potential queuing of service vehicles back onto the street. Trucks delivering exhibits can also drive directly onto the exhibit hall to unload/load and leave via the Kahakai Drive or Kalakaua Avenue exits. For events which may have most attendees or participants leaving at its conclusion, up to 20 shuttle buses can be staged within the truck loading dock prior to the end of the event. The shuttle buses would enter the truck dock for staging via Kalakaua Avenue, and be directed to arrive at the main entry drive via Kahakai Drive for passenger pick-up. The one-way main entry drive fronting the lobby would not require reversing movement of buses or other vehicles.

Regarding the estimated costs of mitigation, please be apprised that the proposed mitigation measures identified in the EIS will be implemented pursuant to the \$350 million established by Legislative H.B. No. S7-93, which provided a mechanism for selecting a site and financing the development of a convention center facility.

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We acknowledge your comment that with regard to access and egress, including during emergencies, helicopter and waterborne services deserve more attention. Please be apprised that the design of the convention center precludes accommodation of a helicopter pad on the roof of the facility. Furthermore, the convention center can be adequately serviced by existing medical facilities in the area. Ambulance dispatch through the 911 system is available within the required 8-minute response time from a number of medical facilities in the area, including Queen's Medical Center, the Kaiser Clinic, St. Francis Medical Center, Kapiolani Hospital, and several private ambulance services.

As indicated in the EIS traffic study and the Draft EIS document, current convention center plans do not include any improvements associated with using the Ala Wai Canal as a waterborne avenue of approach. Several concerns need to be resolved before pursuing such a concept, including potential navigational and recreational conflicts with other groups and individuals who use the canal for boating and canoeing. Certainly, the proposed convention center design would not preclude such a use of the Ala Wai Canal in the future.

The convention center EIS recognizes that the City's Development Plan Public Facilities Map for the Primary Urban Center reflects a rapid transit alignment and station on the convention center property. Development of the regional rapid transit system, however, has largely ceased due to the absence of a dedicated local funding source. Therefore, the convention center request for proposals did not require that a rapid transit station be included in the design proposals. The current convention center design precludes any alignment straight across the site, but could accommodate a future alignment located along its periphery. The convention center design would also preclude future location of a transit station within the project site.

The vehicular access, egress and parking flows within the convention center facility are explained in paragraph 6 of our response to traffic/parking impacts above. The number of on-site parking spaces (800) was established on the basis that the Center's primary market is intended to be off-shore national and international conventions,

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trade shows, exhibitions, and meetings where most of the delegates would be transported to the site by shuttle buses. We wish to clarify that the analysis of the 1,800-person all-local Friday evening post-commuter event is based on the maximum size event which could be held at the convention center based on the number of on-site parking stalls available. As indicated in the EIS traffic study, should there be occurrences of simultaneous local events with a total attendance that exceeds the number of on-site parking stalls, the convention center's transportation coordinator could pursue one or more of the parking alternatives identified in the traffic study. To the extent that event planners may require off-site parking for certain events (i.e., predominantly local attendance or all-local-attendee events), arrangements could be made by the transportation coordinator of the convention center to use existing outlying parking facilities that may be available during the event. The attendees would be required to park at the off-site facility and be transported by shuttle buses to and from the convention center.

We acknowledge your summary opinion that the wisdom of developing a convention center with serious traffic problems, even with proposed mitigation, may be open to question. However, our aforementioned responses to your comments concerning traffic/parking impacts are intended to address that question.

B. Flooding and Drainage Impacts

The flood elevation for the convention center site was derived through a flood elevation study prepared by the previous proponent of the private convention center complex and approved by the City Department of Land Utilization. The flood height is measured in relation to the mean sea level (msl) but actual sea level is not a consideration in its determination. The method used in determining flood heights was consistent with that established by the U.S. Army Corps of Engineers.

The Federal Emergency Management Agency (FEMA) publishes the flood hazard maps as an informational document, however, the flood designations shown were prepared by the U.S. Army Corps of Engineers. The maps are used as

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a reference for enforcing the City's flood ordinance but the FEMA does not directly enforce development standards.

In preparing the FEMA maps, the U.S. Army Corps of Engineers conducted a number of flood studies to determine flood heights for various areas in the state, as shown on the maps. Nevertheless, the availability of resources to conduct those studies was limited and many areas could only be identified as areas prone to flooding without establishing flood heights, which requires more detailed analyses. In such areas, the City requires the project applicant to prepare a flood elevation study to determine the flood height and requires that the study be submitted for their review and approval as a basis for establishing the flood height for the site. This is what was done for the convention center site.

There is no requirement that flood insurance be obtained for the convention center pursuant to the City's flood ordinance. We are uncertain what your "flood damage assessment study" refers to. The use of the term we are familiar with refers to assessments of damage after a flood has occurred.

The contingencies for the National Pollutant Discharge Elimination System (NPDES) being required were discussed in the Draft EIS. Since then, the design/builder has obtained approval by the State Department of Health of a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction. The permit is required to control storm water discharges from construction sites over five acres in size, as in the case of the approximately 10-acre project site. The permit's Best Management Practices (BMP) plan specifies that the design/builder must comply with City ordinances pertaining to grading, grubbing, stockpiling, soil erosion and sedimentation and to implement structural erosion and sediment control measures such as constructing berms to contain runoff and installing silt fences to trap sediment.

Also since the Draft EIS, the design/builder has applied for an NPDES General Permit for Construction Activity Dewatering. The permit application, which has yet to be approved, offers a BMP plan that eliminates the need to discharge dewatering effluent except, possibly, during

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heavy or prolonged storm events. Hence, the permit is requested only for emergency discharges during such storm events. To avoid discharging the effluent, retention basins, which may include excavations needed for construction, will hold the effluent until it can percolate back into the ground. In the event of a large or prolonged storm, the retention basins will serve as detention basins, holding the effluent long enough to allow sediments to settle out before it is discharged.

Installation of the sewer line beneath Atkinson Drive may require the discharge of dewatering effluent, most likely into the City's storm drainage system. If it is determined that dewatering effluent will be discharged, then an NPDES construction dewatering permit will be required. A permit from the City to discharge dewatering effluent into the City's drainage system will also be required.

An NPDES permit will be required for any new point-source discharge, such as a new drainage outlet into the Ala Wai Canal. The Draft EIS indicated that drainage from the convention center will be directed into existing drainage outlets as opposed to establishing new ones. Hence, there is no new permit required. State water quality standards will apply to any discharge into State waters, such as the Ala Wai Canal. Since only storm runoff from roofs and open areas is anticipated to be discharged, no violation of these standards is anticipated.

C. Communications

Your comments regarding communication facilities for the convention center are beyond those normally addressed within the context of environmental and social impacts of a proposed action in an EIS. It should be noted that the convention center design incorporates advanced communication features that will make it a state-of-the-art convention center when it opens. Many of your suggestions are already incorporated in the design.

Nevertheless, we acknowledge your concerns and will incorporate those that are necessary for a world class international center.

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D. Construction Impacts

1. A generalized construction schedule will be included in the Final EIS.
2. The permit procurement schedule is uncertain at this time. Such a schedule is not required by the State's EIS rules.
3. The NPDES permit was discussed previously. Your reference to a "Sec. 4, NPDES permit" (sic) is unclear. We cannot find any reference to Section 4 in the Federal Clean Water Act.
4. Much of the detailed information on construction sequencing has not been finalized and will be subject to change. The construction schedule to be provided in response to item No. 1, above, provides information pertinent to potential impacts during construction.
5. The dustiest period of construction will be during site preparation at the earliest stage of construction for approximately two months. Mitigation measures to be employed to control dust are discussed in the Draft and Final EIS. The noisiest period will likely be during pile driving activities which will last approximately six months.
6. An average manpower of about two hundred is expected for the project, although the number of workers on the site on a given day can vary greatly. Since different phases of construction for different portions of the site will overlap, however, this may tend to even out worker counts. There is no manpower schedule available.
7. It is not anticipated that the delivery of construction materials and equipment will seriously impact traffic since such deliveries will be conducted during off-peak traffic hours. The design/builder will have full-time traffic control for all deliveries to the site. The plan is to unload all materials on site as opposed to parking on the street.

8. Not all of the frequently cited \$200 million development cost of the convention center is considered relevant to generating economic and fiscal benefits in the State. The \$168 million figure used was calculated based on the following information provided by the design/builder:

Local expenditures:	
Building construction cost	\$149
Site preparation, landscaping, utilities, etc.	\$ 13
Design fees expended in Hawaii	<u>\$ 6</u>
Subtotal	\$168
Out-of-State Expenditures:	
Bond, overhead, profit, tax	\$ 17
Authority's cash allowance	\$ 5
Design fees expended out-of-state	<u>\$ 10</u>
Subtotal	\$ 32
Total	\$200

9. Installation and replacement of sewerlines within roadways are relatively routine construction activities with established procedures for minimizing traffic, noise and public safety impacts. Additional discussion of potential impacts and mitigation will be included in the Final EIS.

The road widenings will be constructed outside of the existing traffic lanes adjacent to the convention center property. Hence, construction activities on the adjoining streets will be minimal.

E. Economic Impacts

The economic and fiscal impact assessment is not intended to provide the economic justification for the convention center. Its intent is to assess the Center's economic impacts such as on jobs, hotel development and in-migration as well as its fiscal impacts in terms of tax revenues and costs to the City and State.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and

Mr. Wright Hiatt and Mr. Jack Levin
July 17, 1995
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follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts. As a result of these revisions, the projections related to employment, in-migration, new hotel rooms, and the fiscal impact to the City and State now differ from those you have quoted from the prior assessment.

Ben Torigoe, Professional Planner

A. Flooding

A section through the convention center building would not reveal much in the way of flood impacts. Basically, the main Exhibit Hall floor, the lowest floor, will be at +7 feet msl, which is the flood elevation. Structures that lie below this elevation are the utility corridor, which runs beneath the Exhibit Hall; the elevator and escalator pits; and the driveway portion of the Loading Dock. All of the structures below the flood elevation must be flood-proofed.

B. Botanical

We regret any confusion in our use of the terms. While we feel that our previous discussion was clear, we have made a few revisions to avoid any confusion and to update the discussion on impacts to the banyan trees in the Ala Wai Promenade.

The existing street trees along Kapiolani Boulevard and Kalakaua Avenue which must be removed during construction to widen the roads will be relocated to City parks, if feasible. The feasibility of relocating individual trees will depend upon their health, the quality of the specimen, and whether or not an adequate root ball can be recovered from potential entanglement in various utility lines that are within the roadways. Those trees which cannot be relocated will be disposed of. Relocated trees will be replanted and cared for at their new permanent location. All of the trees removed during construction will be replaced with new, healthy trees of the same species and of comparable or larger size. They will be planted alongside the widened portions of Kapiolani

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Boulevard and Kalakaua Avenue. The relocation of existing trees as a result of street widening will be coordinated with the City Department of Parks and Recreation. They will determine where the relocated trees will be replanted.

The design/builder has requested a permit from the City Department of Parks and Recreation pursuant to Section 41-13.8, Revised Ordinances of Honolulu, to conduct excavation that will remove a portion of the root systems and to prune the Banyan trees in the Ala Wai Promenade which are adjacent to the convention center boundary. On-going consultation with the City's certified arborist has been pursued to formulate a plan to minimize adverse impacts to the trees. The plan includes procedures such as for trimming the roots, installing a root barrier, irrigation and monitoring. Procedures and requirements will also be imposed on tree pruning. The design/builder will install an 8-foot high fence along the boundary between the convention center and the Promenade to keep construction activities out of the Promenade.

A proposal to relocate up to five Banyan trees in front of the grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

C. Archaeology

Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division, the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including planters, in the Ala Wai Canal Promenade. As discussed above, a proposal to relocate up to five banyan trees in the Ala Wai Promenade to fill existing gaps among the trees has been denied by the City's Exceptional Tree Committee. The SHPD has been participating in the proceedings of the Committee regarding the tree relocation.

The SHPD will be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character

of the Promenade. The SHPD will also be considering the impact of paved walkways extending from the stairway onto the Promenade. In general, the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that walkway improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be. The Final EIS will discuss the SHPD's consideration of visual impacts of the convention center structure, and the impact of walkways on the Promenade.

D. Scenic and Visual Resources/Urban Design

The views shown in the Draft EIS were not represented as panoramic views but public views, primarily from "major roadways leading to the site as might be seen by a typical motorist or pedestrian." Because of the density of development surrounding the site, public views are limited primarily to view corridors down major streets. The broadest open space is the Ala Wai Canal and Ala Wai Promenade, which allow a panoramic mauka view from the Waikiki-side of the canal. This view was included in the assessment.

The views analyzed were the same ones shown in the Environmental Assessment for the project, prepared in May, 1994, before the proposed design was chosen. A field visit would verify that the selected views are appropriate since the density of development in the vicinity prevents significant views of the project from more distant ground-level locations.

E. The adequacy of the passenger loading/unloading area for buses and taxis at Atkinson Drive was demonstrated in the DEIS traffic study. Your comment does not specify the basis of your doubts. We are uncertain what you mean by your reference to the "appropriateness" of the passenger loading/unloading area.

F. All City standards for water conservation fixtures will be met. The economic feasibility of grey water recycling/reuse was considered to be too uncertain for a one-of-a-kind facility to include in the Request for Proposal. Toward conserving water resources, the drainage from interior landscape boxes will be reused to

irrigate both interior and exterior landscape boxes as well as perimeter landscaping.

G. The use of "may" in the first sentence simply acknowledges that a storm capable of generating increased sediment is not necessarily going to occur during critical phases of the project when large areas of land are exposed. With respect to the last sentence, at the time that the Draft EIS was prepared, various options were being considered to control stormwater runoff from the site, including possible berming or sheet piling along the perimeter to completely eliminate runoff. The use of detention basins was another alternative. Since that time, however, the design/builder has obtained approval by the State Department of Health of a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction. The permit requires compliance with a Best Management Practices (BMP) plan. Structural erosion and sediment control measures required by the plan include constructing berms to contain runoff and installing silt fences to trap sediment. Building and site drainage facilities and landscaping will control soil runoff after completion of the convention center.

H. The headings used in the Draft EIS are intended to facilitate review. The discussions in some sections, such as Solid Waste, are relatively brief and did not warrant sub-headings to clearly discuss impacts and mitigation. The impact of solid waste disposal is discussed in terms of where solid waste would be disposed of.

I. Based on comments received on the Draft EIS, the social impact assessment in the Final EIS has been revised to discuss recreational impacts, particularly on beaches and parks within walking distance of the convention center. These beaches and parks, such as the Ala Moana Park and Fort DeRussy, as well as those fronting the Ilikai Hotel and Hilton Hawaiian Village, may be frequented by conventioners and their spouses.

Mr. Wright Hiatt and Mr. Jack Levin
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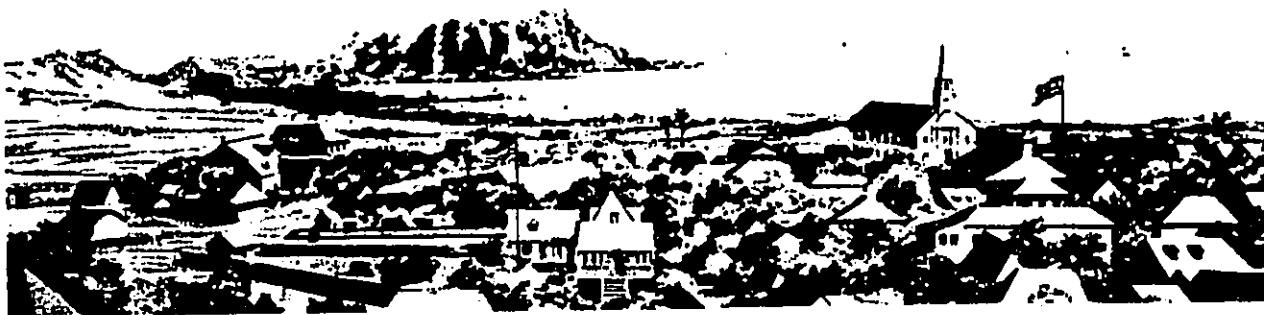
Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



Historic Hawai'i Foundation

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March 24, 1995

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Dion-Magrit Coschigano

Mr. Earl Matsukawa
Planning Director
Wilson Okamoto Associates, Inc.
1907 S. Beretania St.
Honolulu, HI 96811

WILSON OKAMOTO & ASSOCIATES

Dear Mr. Matsukawa:

Subject: Response to Ala Wai Terrace Landscape Park -
ADVERSE EFFECT

Thank you for the opportunity to submit testimony regarding the adverse effect of the terraced landscape park on the Ala Wai Canal. The E.I.S. indicates the plan for encroaching 26 feet into the Ala Wai Canal promenade. The Ala Wai Canal promenade is an important contribution to the canal setting and therefore the adverse effect needs to be addressed in the E.I.S..

The terrace should be set back 26 feet from the present design to maintain width and feel of the existing promenade.

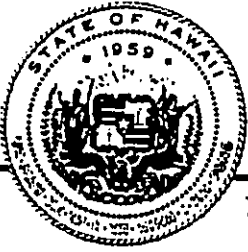
Historic Hawai'i Foundation is a 21 year old statewide, non-profit organization with 3400 volunteers and members, dedicated to the preservation of the historic built environment and cultural heritage of the State of Hawai'i.

Sincerely,

Dion-Magrit Coschigano
Dion-Magrit Coschigano
Acting Executive Director

cc: Governor Benjamin Cayetano
Don Hibbard
Arthur C. Tokin
Michelle Matson
HHF Preservation Committee

Charles Baum
Courtney Damkroger
The Outdoor Circle
Dept of Parks & Recreation



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Dion-Magrit Coschigano
Acting Executive Director
Historic Hawai'i Foundation
P.O. Box 1658
Honolulu, Hawaii 96806

Dear Ms. Coschigano:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS.

Based on yours and other comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.


The SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

DRAFT
Ms. Dion-Magrit Coschigano
June 5, 1995
Page 2

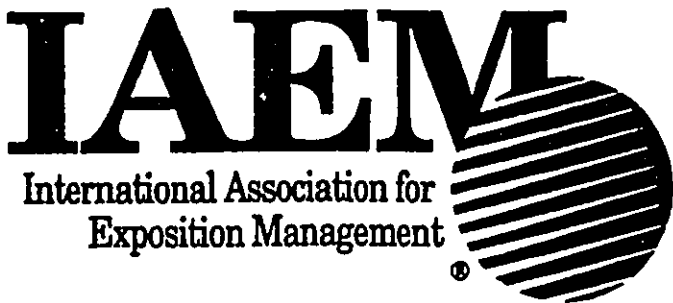
Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



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OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

24 March 1995

Mr. Gary Gill, Director
State of Hawaii
Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, HI 96813

Dear Mr. Gill,

The Hawaii Chapter of IAEM, the International Association for Exposition Management, is in receipt of a report by Charles Baum of the Neighbors of the Ala Wai regarding the Environmental Impact Statement (EIS) for the convention center project at Aloha Motors. We understand that this report has also been submitted to you in compliance with procedures for the public to respond to the EIS.

IAEM represents four thousand trade show producers, managers and suppliers worldwide, many of whom will be potential tenants of Hawaii's convention center. The Hawaii Chapter of IAEM currently has 50 members, some who anticipate using the convention center. It is our desire to see the facility completed as soon as is feasibly possible, but we also believe it must be done properly.

Our review of Mr. Baum's report, however, has prompted us to write to you. We feel that his report has brought up a number of problems justifying serious attention by both the City and the State before construction of the convention center should begin. This seems to be the responsible way to proceed.

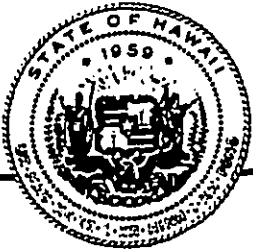
Uncovering problems which might prove to be a detriment to the completion of the project and/or the overall success of the convention center or which can only be resolved by the infusion of substantial amounts of public funds is certainly the purpose of the EIS process. We encourage you to utilize the power of your office to thoroughly investigate Mr. Baum's assessment of the EIS.

Thank you for your attention and consideration.

Yours very truly,

Richard J. Barber
Chairman, Hawaii Chapter
International Association for Exposition Management

C/O PACIFIC TELECOMMUNICATIONS COUNCIL
2454 S. Beretania Street, Honolulu, Hawaii 96828



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Richard J. Barber
Chairman, Hawaii Chapter
International Association for Exposition Management
c/o Pacific Telecommunications Council
2454 South Beretania Street
Honolulu, Hawaii 96826

Dear Mr. Barber:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995
commenting on the subject Draft EIS.

In response to the distribution of the Draft EIS for public
review, more than 80 comment letters were received from
various governmental agencies, community organizations,
private interests, elected officials and individuals. The EIS
process requires that we respond in writing to each of the
points raised in the comment letters and to revise the EIS, as
necessary to prepare the Final EIS. The Final EIS can only be
accepted by the Governor if is deemed to provide a thorough
disclosure of environmental and social impacts of the project.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



**THE LEAGUE
OF WOMEN VOTERS OF HONOLULU**
49 S. Hotel Street ■ Room 314 ■ Honolulu, Hawaii 96813

March 20, 1995

Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Suite 400
Honolulu, Hawaii 96813

Re: Hawaii Convention Center Draft Environmental Impact Statement

We appreciate the letter from the Convention Center Authority dated January 27, 1995 responding to our letters of March 31, 1994 and June 16, 1994. We are gratified that the DEIS tries to address many of the concerns that we raised but we feel that it does not – and probably cannot – adequately provide a solution to many of the problems we identified, nor significantly mitigate many of the adverse impacts the Convention Center will have on the surrounding area.

The major problem with this DEIS is that it appears to be written on behalf of the Convention Center Authority by Nordic/PC, which is obligated by CAA to build a convention center under a contract that does not allow much room for providing mitigation of impacts. It is understandable that Nordic/PCL cannot commit itself to certain mitigation measures, and it is not in the position to commit CCA. We believe that it is essential that the Final EIS clearly indicate that the Convention Center Authority is responsible for its contents and is committed to the implementation of required mitigation measures that may be beyond the scope of the Design/Build contract with Nordic/PCL.

Our comments cover two areas: the DEIS and the planning process. Our specific comments are as follows:

1. Parking Space

In our March 31, 1994 letter we expressed our concern about the lack of parking space. We feel that the assertions made in the DEIS that the parking facilities are adequate to handle all the vehicles that could arrive simultaneously during peak hours – passenger cars, taxis, city buses, shuttle buses, etc. plus service vehicles — are unrealistic. We are particularly doubtful that shuttle buses could load and unload passengers during the projected time periods in the limited number of spaces provided.

2. Traffic Analysis

Perhaps the least satisfactory treatment of the Center's impacts is the conclusion that traffic problems will not become much worse than they are now. We have no technical basis on which to question the assumptions made as to how many persons registered at a 10,000 or 14,000 person convention will actually attend sessions simultaneously and of these, how many will walk, use a shuttle bus, take a taxi or whatever during a given time period. However, the "seconds of delay" described for several intersections seem unrealistic to those of us who have attended Saturday evening affairs at various Waikiki locations and found ourselves a half hour late. How the hundreds, or even thousands, of pedestrians will intermingle with the arriving and departing buses and taxis and private cars baffles us. Given the location, it may not be possible to deal with these problems. But we would prefer a frank statement to this effect somewhere in the document rather than bland assurances that all will be well.

3. Street Widening

The traffic analysis suggests that widening the streets peripheral to the site will take care of traffic problems. There seems to be no responsibility assumed for what happens to the traffic beyond the immediate vicinity, for example, on and beyond the Kalakaua Bridge or further along Kapiolani and Ala Moana Boulevards. The wider streets adjacent to the site will only, we feel, exacerbate the traffic congestion beyond the resulting bottlenecks.

4. Off-Site Parking/Pedestrian Safety

The DEIS assumes that for unusually large or evening events patronized primarily by local residents, or a combination of events, the Center's parking facilities may not be sufficient, and off-site facilities may be needed. This would mean that a large number of pedestrians will have to cross one or more streets against traffic in a relatively short period of time to reach the Center. The FEIS should address ways to mitigate the impacts on these pedestrians.

5. Off-Site Redevelopment

Earthplan has prepared an excellent Social Impact Assessment for the DEIS. It identifies the effect the Convention Center will have in stimulating pressure for redevelopment of the area. It also points out that other development of the site under current BMX-3 zoning would also stimulate redevelopment of adjacent areas. However, the Convention Center may have different impacts on the type of redevelopment that would take place than alternative uses. For example, there may well be pressures to build additional parking lots and structures because of the limited number of parking places provided on site. On-site parking may be adequate for visitor-only conventions. But local attendance at some conventions plus use of the Convention Center by local groups - despite the stated intention not to do this, it will be difficult to resist, particularly if visitor-only conventions are scarce - and demands for employee

parking may create a demand for the construction of new off-site parking. This kind of development is not generally regarded as desirable in neighborhoods. We would like to see further discussion of this specific issue.

The traffic analysis should also address redevelopment effects, for example the additional traffic on Kapiolani that will result from the high-density development the DEIS assumes will take place because of the Center.

6. Employee Parking

Employment at the Center is estimated to be 120 full-time jobs and 230 event-related jobs. If all employees park at the Center during an event, 350 of the planned 800 parking spaces will not be available for attendees. The parking alternatives suggested for a parking management plan include providing for employee parking at nearby hotels, offices and condominiums for a fee and charging prohibitive on-site fees to discourage parking at the Center. In either case, it would seem more likely that the employees who have to drive to work would seek free street parking with the consequent impacts on adjacent neighborhoods. Some realistic plan for employee parking should be developed to avoid or at least lessen these impacts.

7. TheBus

Many employees will use TheBus to commute to work at the Convention Center. The DEIS acknowledges that TheBus service is presently inadequate and will be further stressed by convention attendees and employees. It also notes that the location of bus stops and pedestrian crosswalks will create unsafe conditions for persons using the bus to reach the Center. However, mitigation measures seem to be left entirely to the City to resolve. Should not CCA bear some responsibility to assist the City in addressing the problems it will create?

8. Bicycles

This DEIS, like most of those developed in Hawaii, does not even consider bicycles as form of transportation. We do not expect visitors to bicycle to the Convention Center but surely this option should be available to employees and residents!

9. Rail Transit/People-Mover System

The DEIS mentions the possibility that rail transit, or at least a people-mover system, may be counted on to help solve traffic congestion problems. Even though this is mentioned as a potential long-range solution, the current fiscal and political climate makes this a very long-range solution. The only feasible mass transit alternative in the near and somewhat longer future is the use of multiple-passenger vehicles. They may be minivans, chartered private buses, or city buses, but buses they will be. They will have to load, move through vehicular and pedestrian traffic, park, unload, load, turn around, and move through

traffic again, at the site and throughout Waikiki. The traffic analysis should focus on these movements and their impacts.

10. Physical Environment

The issues concerning the physical environment are relatively few for this project because of its location in an urban area and its former use. We believe that compliance with Department of Health rules will be sufficient to address all potential impacts in this category except noise. The DEIS discusses potential noise impacts and suggests mitigation measures but makes no commitment for implementation. The CCA should adopt these mitigation measures, and possibly some additional ones, as part of its management program for the Center.

11. Planning Process

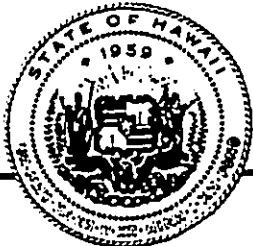
As we stated previously, we felt – and still feel – that analysis of the environmental impacts of a project as large and significant as this should have been undertaken before the site was selected. Information on such impacts as traffic, parking, transportation by car or bus, noise, and costs to the City would have been more useful, we feel, before the apparently irreversible decision was made to build on this site.

We also said that we thought it was unfortunate that the RFP set no limit on height, bulk, or lot coverage. We feared that the result would be “a massive building envelope which would permit a monstrous box 105 – or even 145 – feet high and covering almost the entire 10 acre parcel.” This is exactly what has happened. The proposed Center will be massive, up to 138 feet high and will cover 85% of the site. The 2.5 acre roof garden is called open space but it is at too great a height to be seen or enjoyed from the surrounding streets, and in any event, will be destroyed if the planned expansion is built.

The builders of large structures need to take extra care about the effects they will have on their neighbors. We would like the Final EIS to describe clearly how these adverse effects will be avoided.


Suzanne Meisenzahl, President
League of Women Voters of Honolulu

cc: Convention Center Authority
Wilson Okamoto and Associates, Inc.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Suzanne Meisenzahl
President
The League of Women Voters of Honolulu
49 South Hotel Street, Room 314
Honolulu, Hawaii 96813

Dear Ms. Meisenzahl:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 20, 1995 commenting on the subject Draft EIS.

The Hawaii EIS Law (Chapter 343, Hawaii Revised Statutes) requires EISs to disclose environmental and social impacts and to discuss how they will be mitigated, if at all, by any proposed mitigation measures. There is no requirement that any impacts be mitigated.

You are correct that the EIS is prepared by the design/builder for the State Convention Center Authority (CCA). The CCA is responsible for the EIS because it is proposing an "agency action" utilizing State lands and funds.

The design/builder is also responsible for funding all construction-related mitigation measures proposed to be implemented, from the fixed design/build fee. The CCA has no additional funds at its discretion and cannot commit to the funding of any mitigation measures. The CCA will, however, require the future convention center operator to implement any mitigation measures that are committed to in the EIS concerning operations of the convention center once it is completed.

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

1. Parking Space

First, we wish to clarify that site access for the proposed convention center effectively separates different types of traffic to minimize conflicts between vehicle types and modes

Ms. Suzanne Meisenzahl
July 17, 1995
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of transportation. The three-lane entry drive fronting the convention center lobby includes an approximately 150-foot long left lane which could accommodate up to six taxis or vehicles for passenger drop-off/pick-up; an approximately 335-foot long lane curbside of the lobby to accommodate up to six full-size shuttle tour buses; and a middle lane for passing and maneuvering into and out of the two curb lanes. Another passenger drop-off/pick-up area for taxis and private and rental vehicles will be provided within the parking garage of the convention center. Vehicular access to and from the parking garage is provided by two ramps on Kahakai Drive and a secondary ramp on Kalakaua Avenue. Access to the truck loading dock is located on Kahakai Drive through a driveway that is separate from the parking garage ramps.

In regard to your doubts concerning the shuttle bus loading/unloading operations, the traffic study indicates that based on the traffic industry's standard estimates, it takes an average of 2.0 seconds per alighting (disembarking) passenger and 3.0 seconds per boarding passenger per shuttle bus. The traffic industry standards apply a percentage increase factor to the dwell time (total time that a bus is stopped to service passengers) to account for variations in dwell time, as well as the clearance interval between buses and the arrival rate of buses. Based on these factors, the total "average" dwell time for a capacity 49-passenger shuttle bus is 2 minutes 30 seconds for unloading operations, and 3 minutes 30 seconds for loading operations.

According to the traffic study, for a 14,000-person convention, the six bus berths provided at the main entry drive fronting the convention center lobby should be adequate to accommodate the shuttle bus operations and number of bus trips during the heavier AM peak hour under normal conditions. During the PM peak hour, the six bus berths fronting the lobby would more than accommodate anticipated bus loading demands. Also, the two additional bus berths along the proposed widened portion of Atkinson Drive fronting the project site would be used as reserved bus berths should the six berths fronting the lobby be fully occupied. Furthermore, if necessary, up to 20 shuttle buses can be staged within the truck dock area located entirely within the convention center site.

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July 17, 1995
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2. Traffic Analysis

Your comment indicating that perhaps the least satisfactory treatment of the convention center's impacts is the conclusion that traffic problems will not become much worse than they are now is understandable, given everyone's personal frustrations of Saturday evening traffic tie-ups in Waikiki. However, the EIS traffic study demonstrates that the convention center will mitigate its traffic impacts to conditions comparable to that of a no-project scenario.

You indicate that your organization has no technical basis on which to question the assumptions made with respect to delegate attendance and travel mode splits. The travel forecast assumptions and modal shares used in the EIS traffic study were developed pursuant to discussions with persons with extensive experience in convention center operations across the nation and those associated with major Waikiki hotels which host convention events. Specifically, information was obtained through discussions with managers and others associated with the Los Angeles, San Diego, Miami, Moscone Center (San Francisco), Portland, and Sacramento convention centers. In addition, the information obtained was further supplemented and verified in consultation with the CCA's Marketing Director. Justification for the travel forecast assumptions and travel mode percentages will be provided in the traffic study to be included in the Final EIS document.

You also indicate that the "seconds of delay" described for several intersections seem unrealistic to those who have attended Saturday evening affairs at various Waikiki locations and been a half hour late. First, we wish to emphasize that the key intersections in the vicinity of the convention center would experience long delays even without the convention center traffic. The proposed convention center roadway improvements would mitigate the anticipated additional delays resulting from the convention center traffic. Furthermore, the EIS traffic study recognizes that traffic entering Waikiki is predominantly heavy during the early evening hours on Friday and Saturday. As such, Friday evening was analyzed as the assumed "worst-case" scenario, when the residual post-commuter peak traffic period overlaps visitor and resident traffic entering Waikiki.

In further addressing your comment on "seconds of delay", we note that intersection delay is expressed in seconds to

Ms. Suzanne Meisenzahl
July 17, 1995
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determine the "average delay" experienced by all vehicles at a particular intersection. One way to quantify the impacts resulting from traffic generated by the convention center is by calculating the average delay at an intersection. The same procedure is used to measure the effectiveness of the proposed roadway improvements which are designed to mitigate the additional delay caused by convention center traffic. The half-hour late arrival time which you indicate is the result of an accumulation of delays encountered along the entire route taken (i.e., including freeway exit ramp delays, signalized intersection delays, and the delay encountered entering the parking garage at your destination). During large events at the convention center, it will actually be the responsibility of the convention organizer to publicize the event so that Waikiki-bound motorists will be able to adjust their travel behavior to avoid peak traffic times and congested routes into Waikiki.

You raise a concern as to how the number of pedestrians will intermingle with the arriving and departing shuttle buses, taxis, and private automobiles at the convention center. Given the selected convention center site, the Center's site access was designed to minimize conflicts among private and rental automobiles, taxis, shuttle buses, and pedestrians. Private and rental automobiles will be directed to the parking garage entrances on Kahakai Drive and Kalakaua Avenue. Shuttle buses and taxis would enter the main entry drive area at the corner of Atkinson Drive/Kapiolani Boulevard to service conventioners. Oahu visitor attendees walking to the convention center from Waikiki hotels are expected to enter the facility via the Ala Wai Promenade access.

3. Street Widening

In response to concerns expressed that other intersections could be affected by convention center traffic, additional analyses have since been conducted to verify that the most critical intersections have been analyzed in the EIS traffic study. The additional intersections analyzed include: Kalakaua Avenue at McCully Street, Kalakaua Avenue at Ena Road, Kalakaua Avenue at Ala Moana Boulevard, Ala Moana Boulevard at Ena Road/Kalia Road, Ala Wai Boulevard at McCully Street, Kapiolani Boulevard at McCully Street, Makaloa Street at Kalakaua Avenue, Hobron Lane at Ala Moana Boulevard, Atkinson Drive at Mahukona Street, and Kapiolani Boulevard at Kaheka Street/Mahukona Street. The report on the analyses of

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these additional intersections, which will be included in the Final EIS document, substantiates the selection of critical intersections initially analyzed, and indicates that the impacts on the other intersections are relatively insignificant. The widening at Kapiolani in front of the convention center does have significant traffic benefits because of the higher volumes of existing traffic in this one-block section between Atkinson and Kalakaua. However, as described above, there is no indication that the congestion will be transferred to other nearby intersections.

4. Off-Site Parking/Pedestrian Safety

Regarding the use of existing off-site parking facilities, we wish to clarify that these are remote facilities and convention attendees who park at them would be transported by shuttle buses to and from the convention center. As such, there would be no pedestrian impacts resulting from this operation. Such off-site parking facilities could include those at the Blaisdell Center or the University of Hawaii at Manoa campus, although there is no agreement currently in place to use either of these parking facilities.

5. Off-Site Redevelopment

Parking within the convention center is designed to accommodate overseas convention events where most of the delegates would be transported to the site by buses. The Blaisdell Center will remain the primary venue for local events. On-going improvements to the Blaisdell Center were funded in the amount of \$13 million by the State specifically to better accommodate local trade-shows and other large local events. Moreover, it is not the intent of the convention center to take business away from hotels with ballroom facilities accommodating smaller conventions, and local events such as wedding receptions. Thus, local events at the convention center are anticipated to be infrequent and the demand to justify construction of nearby off-site parking is not foreseen.

To the extent that the convention center parking garage cannot accommodate parking for large local events, event organizers will be required to arrange for off-site parking. In spite of such measures, on-street parking is available to the general public and, inevitably, some people will choose to seek out such parking, creating additional competition for the limited

Ms. Suzanne Meisenzahl
July 17, 1995
Page 6

number of spaces available. We will discuss this in the Final EIS.

As the parcels most susceptible to redevelopment in the adjacent area are primarily located within the BMX-3 Community Business Mixed Use District zoning designation, future development could conceivably include condominiums, commercial office/retail uses, and commercial parking lots and garages, among other uses. Furthermore, the City's Development Plan Special Provisions for the Primary Urban Center allow hotels as part of the commercial emphasis mixed-use development in the area bounded by Kapiolani Boulevard, Kalakaua Avenue, the Ala Wai Canal, the medium-density apartment designated area, Atkinson Drive, and Mahukona Street. Nevertheless, even if we were to assume likely project compositions, the uncertainty as to actual composition and timing of such development would preclude a reasonable analysis of traffic impacts. However, the development would be market driven, and therefore to account it, an annual traffic growth rate of 1.5 percent per year through 1998 has been factored into the analysis in the traffic study.

6. Employee Parking

The parking analysis conducted in the EIS traffic study assumes that 83 on-site parking stalls would be allocated to full-time convention center employees. As indicated in the traffic study, it would be incumbent upon the convention center's transportation coordinator to establish a transportation management plan (which includes parking) to discourage employees from parking in the adjacent neighborhood. Nevertheless, as indicated in our response no. 5, some employees may try to find on-street parking in the area, thus contributing to competition for the limited number of available spaces.

7. TheBus

The EIS traffic study anticipates that convention center-associated trips by Oahu residents (local attendees and employees) using public transit would be dispersed among buses on Routes 2, 8, 19, 20, and 47, as well as transfers made at Ala Moana Center. Therefore, the impact of these bus riders on any particular route would be insignificant. However, Route 2 would be significantly impacted if it were heavily used by conventioners from Waikiki hotels. The traffic study

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July 17, 1995
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indicates that this route could not accommodate the additional riders without adding more bus capacity, either more vehicles or use of higher-capacity articulated buses. Accordingly, the traffic study indicates that mid-size and large conventions should stress the use of special convention shuttle services, and that a convenient system of shuttle buses should be provided between the hotels and the convention center. Convention literature should promote use of such systems.

8. Bicycles

Although your suggestion is well taken, the Request for Proposals (RFP) for development of the convention center did not require the provision of bicycle parking within the facility. Furthermore, the ground floor level of the current convention center design is unable to accommodate space for such bicycle parking amenities. However, it is possible that the convention center operator may be able to accommodate bicycle parking in some locations on the parking level for employees and residents. We agree that this option is a viable form of transportation.

9. Rail Transit/People-Mover System

Although your suggestion that the only feasible mass transit alternative in the near and somewhat longer future is the use of multi-passenger vehicles, the uncertainty as to the type and size of vehicles which may be used, and consequently the number of vehicles, make it difficult to analyze its traffic impacts. Also, given that the EIS traffic study's analysis for a 14,000-person convention assumes that the majority of Oahu visitor conventioners would ride shuttle buses (70 percent), it would likely be unfeasible to have other multi-passenger vehicles solely servicing the convention center.

10. Physical Environment

The design/builder has committed to construction phase noise mitigation measures, including the erection of 16-foot high noise barriers along the Kahakai Drive boundary and pre-drilling through the upper coral layer for piles to be driven to the lower coral layer, thus reducing the number of blows required to install piles. Also, noisier equipment such as generators will be staged in locations at least 400 to 500 feet away from the residences, when possible. A summary of all mitigation measures committed to will be included in the

Final EIS. State Department of Health (DOH) rules will govern other aspects of construction noise, including allowable days and hours that noisier construction activities may occur, and requirements for mufflers on trucks and other equipment.

In the design of the convention center, DOH standards for noise levels at the property line will be met with respect to noise from mechanical equipment and trucks and other vehicles within the convention center. Because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

With respect to functions at the convention center, particularly on the Rooftop Garden, the CCA will require the future convention center operator to comply with DOH rules for noise at the property line. This may restrict the use of any voice or music amplification systems or require the use of portable sound attenuation structures.

11. Planning Process

The process for the selection of the convention center site has a long history, including a 1985 site selection analysis prepared by Pannell, Kerr & Forster which examined nine sites in Waikiki; the Department of Business and Economic

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Development study of 1987, which considered the Ala Wai Golf Course site (Kahala side), a Kakaako site and the International Market Place site; and, a 1987 site selection study prepared by the Legislative Reference Bureau, which evaluated the Ala Wai Golf Course, Fort Armstrong, Fort DeRussy, and the Waikiki Shell/Kapiolani Park sites. In 1993, the Legislature considered the Hobron site, the Ala Wai Golf Course site (Ewa side) and the Aloha Motors site before selecting the currently proposed site. While it would seem ideal to base the selection on factors such as traffic, parking and accessibility and other factors, the opportunities available at any given time vary considerably. Considerations such as the amount of land available and its implication on design, as well as acquisition costs and the need to condemn private property must also be taken into account. The Aloha Motors site is the most studied of all of the sites considered, inasmuch as a much denser convention center complex was proposed and approved there by the City Council. This indicated that a "stand-alone" center would be feasible.

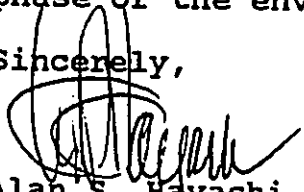
The CCA established the minimum requirements for the convention center. Given the fixed budget for the competing design/builders to construct their proposal, it is not surprising that all of the proposals stayed very close to the minimum requirements, particularly for the 200,000 square foot single-level main exhibition hall. The exhibition hall alone takes up most of the site, necessitating other required meeting, ballroom, parking, and support spaces to be accommodated on different levels.

The Final EIS will clarify any effects on neighboring properties based on comments received on the Draft EIS and will describe any additional measures that may be proposed to mitigate those impacts.

Ms. Suzanne Meisenzahl
July 17, 1995
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Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



THE OUTDOOR CIRCLE

1110 University Ave., #406 • Honolulu, HI 96826
Phone: 808-943-9658 Fax: 808-955-7364

March 24, 1995

RECEIVED
MAR 28 1995

WILSON JKAMOTO & ASSOC INC

Established 1912

A Non-profit Organization

BRANCHES

OAHU

Ewa Beach
Kaneohe
Lani-Kailua
North Shore

HAWAII

Hilo
Kona
Puna
Waimea

KAUAI

MAUI

MOLOKAI

GARDEN CIRCLES

Hawaii Kai
Kaneohe
Lani-Kai
Waialae-Kahala

Mr. Alan S. Hayashi, Executive Director
Convention Center Authority
The State of Hawai'i
841 Bishop Street, Rm. 2222
Honolulu, HI 96813

Re: Draft Environmental Impact Statement (DEIS)
Hawai'i Convention Center
TMK: 2-3-35: 01
Honolulu, Oahu, Hawai'i

Dear Mr. Hayashi:

Thank you for allowing The Outdoor Circle an opportunity to comment on the above referenced DEIS. As stated in previous correspondence, we continue to be concerned about the fate of the Exceptional ficus trees located at the Ala Wai Promenade.

On Monday, March 20, 1995, The Outdoor Circle held a Board of Director's meeting to discuss the DEIS as it relates to these Exceptional trees. We noted that the preliminary design for the Convention Center calls for the relocation of five of the trees to other sites within the same grove but closer to the ocean. We also reviewed the Hawai'i Revised Statutes (HRS) Chapter 58, "Exceptional Trees" (sometimes referred to in this letter as the "Act"), and Revised Ordinances of Honolulu (ROH) Chapter 41, Article 13 "Protective Regulations of Exceptional Trees" (the "Ordinance").

It is the opinion of The Circle that the proposed relocation of the Exceptional trees would go against the letter and intent of the Act and the Ordinance. Both provide for the protection of Exceptional trees, with very limited room for deviation in their respective requirements.

The Act defines Exceptional trees as "a tree or stand or grove of trees with historic or cultural value or which, by reason of its age, rarity, *location*, size, aesthetic quality or endemic status," has been so designated by each county's Arborist Advisory Committee (emphasis added). The Act further provides that the Department of Land and Natural Resources and the University of Hawai'i "shall cooperate with and, to the fullest extent possible, assist the counties and their respective committees in carrying out this charter." The Ordinance echoes this definition, and goes on to state that it shall be "liberally construed to effectuate the purpose stated herein [ROH 41-13.2]. In fact, the Ordinance goes so far as to grant police power to the Building Department, the Department of Land Utilization and the Department of Public Works to "do all acts necessary" to enforce compliance with the Ordinance [ROH 41.13.6].

Mr. Alan S. Hayashi

Page 2

The Ala Wai Promenade has long been a special space. These trees will be more than sixty years old when the Convention Center opens, and will continue to be protected under the Act and the Ordinance. Ground rules for all preliminary designs submitted for the Center called for these trees to remain untouched. Now the Authority is proposing to relocate five trees to accommodate the tentative design for a grand stairway leading from the Promenade to the Center. The Outdoor Circle believes the trees should not be moved simply to accommodate a design feature of the new construction. This would contradict the stated purposes of the Act and the Ordinance, and would set a bad precedent for their future application. The trees are in place and the Convention Center is not. It is more practical to redesign the stairway than to undertake the risks associated with moving five sixty-year old Exceptional trees. The Ordinance allows for tree removals only in emergency situations, and the proposed design does not constitute an emergency.

In addition, we have grave concerns regarding the development plan (or lack of a plan) with respect to maintenance and preservation of all of the trees adjacent to the new construction. The proposed Convention Center excavation will damage at least one-third of the root systems of the trees on the mauka side of the Promenade. The removal of such a major portion of the root systems will necessarily affect the shape of the canopy on each tree, thereby requiring a permit before construction can begin. Furthermore, measures must be taken to protect the tree roots during construction. Machinery must never be parked under their canopies. The Promenade should never be used for ingress and egress.

Prior to construction, we encourage the Authority to set-up a temporary sprinkler system. Consistent and appropriate levels of watering would help to fortify the trees against the negative effects of the proposed construction. If the Authority takes the proper measures, these Exceptional banyan trees will truly be an enhancement to the Convention Center.

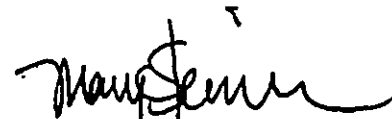
Finally, we note that the DEIS calls for the inclusion of a line of monkeypod trees along a widened Kapiolani Boulevard fronting the Convention Center. The Circle hopes that the trees, when removed, will be relocated in an area close to their present site so that area residents can continue to enjoy the benefits of these special trees. When widening has been completed, The Circle recommends planting monkeypods of the same size and stature as those which were replaced. Beautiful, mature trees will significantly enhance the urban landscape.

Again, thank you for the opportunity to respond to these issues. If you require further information, please feel free to call.

Sincerely,

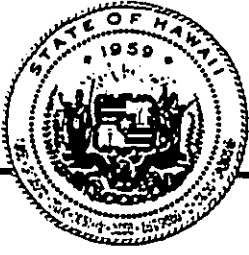


Susan Bright Spangler
President



Mary Steiner
CEO

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Susan Bright Spangler
President
Ms. Mary Steiner
CEO
The Outdoor Circle
1110 University Avenue #406
Honolulu, Hawaii 96826

Dear Ms. Spangler and Ms. Steiner:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Based on yours and other comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawaii'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

The design/builder has requested a permit from the City Department of Parks and Recreation pursuant to Section 41-13.8, Revised Ordinances of Honolulu, to conduct excavation that will remove a portion of the root systems and to prune the Banyan trees in the Ala Wai Promenade which are adjacent to the convention center boundary. On-going consultation with the City's certified arborist has been pursued to formulate a plan to minimize adverse impacts to the trees. The plan includes procedures such as for trimming the roots, installing a root barrier, irrigation and monitoring. Procedures and requirements will also be imposed on tree pruning. The design/builder will install an 8-foot high fence along the boundary between the convention center and the

Ms. Susan Bright Spangler and Ms. Mary Steiner
July 17, 1995
Page 2

Promenade to keep construction activities out of the Promenade. The Final EIS will include a discussion of the foregoing efforts to protect the banyan trees in the Ala Wai Promenade.

The relocation of the monkeypod trees from the proposed widened Kapiolani Boulevard is being coordinated with the City Department of Parks and Recreation. They will determine where the trees will be replanted. All monkeypod or other trees relocated as a result of road widening will be replaced with specimens comparable to or larger than those removed.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 18, 1995

RECEIVED
MAR 21 1995

WINDEN WANDER

Convention Center Authority
841 Bishop Street, Suite 2222
Honolulu, Hawai'i 96813

Attention: Mr. Alan Hayashi

Dear Sir:

My name is Ronald Tanaka, General Manager of SIDA (State Independent Drivers Association) Taxi from 1972 to January 31, 1994. SIDA had the exclusive concession to provide taxi-metered services at Honolulu International Airport during the above period.

During the above 20 odd years, we were involved in all convention-group transfers. To the best of my recollection, there were only five (5) convention groups totaling over 10,000 persons, that returned at least twice, but never more than two groups per year. More than 60% of these persons of convention groups preferred transfers by taxis rather than busses. Very important: We did not have a convention center so why do we need one now?

What we residents of Oahu cannot understand is why was Sukamto's offer to privately fund the convention center was rejected? Furthermore, the persons of the convention groups would have rooms at his hotel on the property. Therefore, traffic problems would have been negligible.

We already are aware that Singapore, with its own airline rated the best in the world and a strong economy, is out to corner the convention market. Hawai'i tried to have the World Travel Agents convention but couldn't compete with Singapore that offered airfare and hotel rooms at no expense to that convention group.

Hong Kong also has already spent \$100's of millions extending the harbor for the convention market also.

It doesn't take "brains" to get out of the convention group market. In order for our elected representatives to regain the confidence of our residents, they should cancel this State Funded "World Class Convention Center". This would immediately resolve our budget shortfall problems, and actually have a surplus for school repairs, deserving activities, settle the suit by the Hawaiian Home Lands, and funds to promote the increase in the number of visitors on a Statewide basis.

I have already submitted many proposals to members of the Legislature, which would increase visitors to Oahu and the neighbor islands, utilize the services of the present contractors of the Convention Center, but most important to generate employment opportunities for our residents and improve the quality of our life and of future generations.

Over 90% of our visitors are FIT's (Free and Independent Travelers) and Group Travel, packages arranged by travel agents which include airfare, hotel rooms, shopping and sightseeing tours, dining, etc.

Our efforts must be directed to provide these visitors with a variety of leisure time activities: historical sights of each island, a theme park with the history of our local culture, family oriented types of recreational facilities, and other activities they desire.

Hawai'i's climate, nice beaches and the Aloha Spirit (which is declining) is not enough to compete with Australia and resorts in Southeast Asia. The World Tourism Organization claim that Indonesia is the hottest worldwide destination. We cannot afford to see a decline in visitors from Japan, Korea and China.

Let's assume that the "State Funded World Class Convention Center" (Hereafter referred to as C.C.) is to continue. All of our residents must pay for these costs. On Oahu our residents already pay for the sewage overflow problems and also have to bear the traffic congestion and water shortage problems.

SIDA was a member of the Hawai'i Visitors Bureau and therefore have much information about potential convention groups in the future.

The Real Estate Group of 28,000 persons are seriously considering the C.C. if it is completed on schedule in 1998.

The Draft EIS should therefore consider not only the traffic impact but also the substantial increase in costs. By considering this optimum number of 28,000 persons, it will insure that all other conventions of lesser persons will have no problems.

Many of the Real Estate Group will include 1,000's of local real estate persons. Your parking garage of 800 stalls will be grossly inadequate.

I'm also aware that the Dental Groups of about 20,000 persons are also considering the C.C.

I'm also aware that convention groups already committed, would be no more than 5,000 and the majority will be held on Maui and Kona.

Any convention groups with less than 10,000 can be accommodated at the Sheraton Waikiki and Hilton Hawaiian Village. There were three convention groups so far this year, 4,200 and 2,400 at the Hilton Hawaiian Village and 4,200 at Sheraton Waikiki. The only transportation problem they had was how fast can they get on and off the elevator.

A public hearing on Draft EIS was conducted by the Honorable Senator Carol Fukunaga and Les Ihara, accompanied by Representative Mary Jane McMurdo on March 14, 1995 and televised by OIelo.

Frank Nalbach, the last person to testify is President of OTOA (Oahu Taxi Owners Association) with 800 taxi drivers as members including SIDA taxi drivers. Therefore he is very knowledgeable about SIDA's operations from the early 1970's.

Thank you for considering our proposal.

Sincerely,

Ronald Tanaka
Ronald Tanaka
General Manager
SIDA OF HAWAI'I, INC.

cc: Wilson Okamoto & Associates, Inc.
1907 South Beretania Street
Honolulu, Hawaii 96826
Attention: Mr. Earl Matsukawa

Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813
Attention: Mr. Gary Gill



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Ronald Tanaka
General Manager
SIDA of Hawai'i, Inc.
686 Ahua Street
Honolulu, Hawaii 96819

Dear Mr. Tanaka:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 18, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

While existing hotels on Oahu can and will continue to host smaller conventions, the convention center is designed to accommodate conventions averaging 7,500 persons and up to 14,000 persons. The Hawaii hotel industry acknowledges that there is a large convention market that cannot be tapped without a "world class" convention center in or near Waikiki. Large conventions that have come to Hawaii in the past have had to make-do with scattered meeting venues and using parking garages for exhibit space. Some have indicated that while they want to come to Hawaii, and have done so in the past, they cannot consider another convention here until a convention center is built. The economic and fiscal impact study in the Draft EIS discusses the economic benefits that may be derived from the anticipated market which the convention center can tap into.

The earlier proposals for a privately developed convention center were never rejected. The developers decided that their projects were no longer economically feasible and did not proceed in spite of having been granted required approvals by the City. It should be noted that a primary benefit of the current convention center is to increase and stabilize hotel occupancy in existing Waikiki hotels, as opposed to competing with them, which would have happened with the previous private proposal. The private proposal was also criticized by tourism officials for not having a "world class" size convention facility.

Mr. Ronald Tanaka
July 17, 1995
Page 2

While the Hawai'i Convention Center faces stiff competition from other convention centers, the reputation of Hawaii as a major visitor attraction and its central location enabling access to east-bound and west-bound markets, provide significant advantages.

The funding for the Hawai'i Convention Center is derived from the transient accommodations tax (hotel room tax) paid by visitors. In 1993, the State Legislature raised the tax rate from 5 to 6 percent specifically to fund the convention center. The economic and fiscal impact study in the Draft EIS clearly shows the benefits of the convention center in increasing tax revenues from income taxes, as a result of jobs created in the visitor industry, as well as from transient accommodation tax, as a result of increased visitor counts.

Your comments on maintaining FITs in Hawaii are well taken and we certainly do not advocate turning our back on the market that has been the backbone of our economy over the decades. To some extent, the convention center may displace FITs in Waikiki, as discussed in the economic and fiscal impact study. At the same time, the majority of these displaced visitors may be captured by other Oahu or Neighbor Island destinations through appropriate marketing. Convention visitors may also contribute to the FIT market through pre- and post-convention vacation packages. Nevertheless, others have also expressed concerns with respect to displacement, particularly of east-bound visitors from Japan. Therefore, the revised Economic and Fiscal Impact Assessment in the Final EIS includes an expanded discussion on this topic.

Tapping into the convention market is viewed as desirable because conventioners tend to spend more per capita than westbound and eastbound FITs and will book hotel rooms years in advance with less susceptibility to cancellation than FITs. Also, as you have stated, with the increasing competition for FIT from other resort destinations worldwide, the convention market offers the opportunity to broaden Hawaii's visitor base.

Your comment regarding who pays for the impacts of the convention center is well taken. The Economic and Fiscal impact assessment in the Draft EIS indicated that the City will be incurring costs such as for police and fire protection as well as other City services for an increased population that may result from the in-migration of people attracted by

Mr. Ronald Tanaka
July 17, 1995
Page 3

direct, indirect, and induced employment created by the convention center. It further indicated that the tax revenues derived as a result of increased visitor industry activity generated by the convention center will accrue primarily to the State, at least in the near term. Hence, the fiscal impact to the City was shown to be as much as \$2 to \$3 million in the negative from 1998 to 2003 before turning positive in 2008 at \$400,000. Therefore, to some degree, Oahu property owners would have borne some of the "costs" of the convention center.

Based on comments received on the Draft EIS, however, the economic and fiscal impact assessment in the Final EIS has been revised. One of the revisions in the assessment is the distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's share of the statewide TAT collection could range from \$7.3 to \$8.9 million in the revised 2008 projection. The County's net new revenue projection is also positive, ranging from \$3.6 to \$5.4 million per year in 2008. As in the case of the prior study, both the State and the County incur a negative fiscal impact during construction of the Center, before its economic benefits can be realized. These losses are more than compensated, however, when the Center becomes operational.

The convention center will increase wastewater flows and consume more water in the near term despite the fact that there are no new hotel rooms being constructed in conjunction with the center. However, the amounts will only increase in accordance with the direct use of conventioners. Irrigation, service and maintenance uses which are not dependent on occupancy will remain constant. Costs to cover increased flows will be paid by user fees included in room charges. In the long-term, however, if visitor activity increases, it is anticipated that new hotel rooms will be constructed to meet the demand. Depending on where the hotel rooms are constructed (for example, at other Oahu resorts or on the Neighbor Islands), there may be additional wastewater generated and additional water consumed.

The EIS considers the largest anticipated number of persons expected to be at the convention center at a given time. Although a convention may involve 28,000 persons, they are typically represented by delegates who would attend a large

Mr. Ronald Tanaka
July 17, 1995
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plenary session. For the proposed size of the convention center, it is anticipated that the largest convention event, such as a plenary session, would involve 14,000 persons. It is on this basis that the studies are based.

Convention events involving heavy participation by local residents were considered in the EIS traffic study. However, we emphasize that the convention center is not intended to be a primary venue for local events nor to compete with the Blaisdell Center or Waikiki hotels with ballroom facilities used to host smaller conventions. Large indoor local events will continue to be staged at the Blaisdell Center or at the various hotel ballrooms in Waikiki and elsewhere. The convention center could, however, supplement the existing local venues.

Should there be occurrences of simultaneous local events with a total attendance that exceeds the number of on-site parking stalls, the convention center's transportation coordinator could pursue one or more of the parking alternatives identified in the EIS traffic study. To the extent that event planners may require off-site parking for certain events (i.e., predominantly local attendance or all-local-attendee events), arrangements could be made by the transportation coordinator of the convention center to use existing outlying parking facilities that may be available during the event. The attendees would be required to park at the off-site facility and be transported by shuttle buses to and from the convention center. Such off-site parking facilities could include those at the Blaisdell Center or the University of Hawaii at Manoa campus, although there is no formal agreement to use either of these parking facilities.

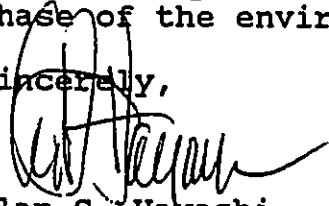
Convention events involving 5,000 or fewer participants are likely to continue using existing hotel convention facilities throughout the State. Again, the Hawai'i Convention Center is not intended to compete with hotel facilities. Most of the conventions anticipated to use the new facility will be groups averaging 7,500 persons. Groups up to 10,000 persons can be accommodated at some existing hotel facilities depending upon their meeting and exhibition requirements.

We acknowledge the views expressed by Mr. Nalbach.

Mr. Ronald Tanaka
July 17, 1995
Page 5

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

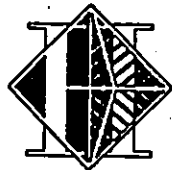
Sincerely,


Alan S. Hayashi
Executive Director

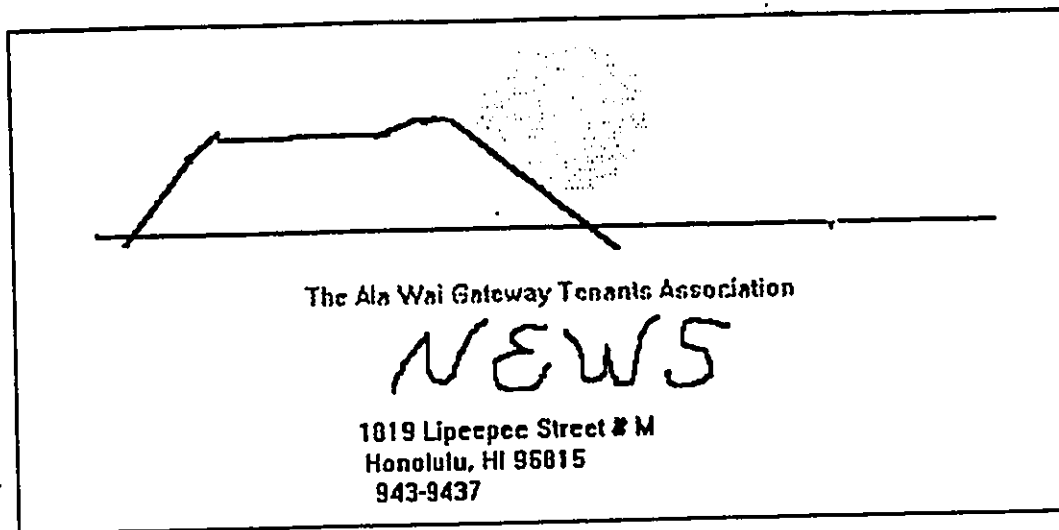
cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER EIGHT

COMMUNITY ORGANIZATIONS
Comments Received and Responses



Hawai'i Convention Center



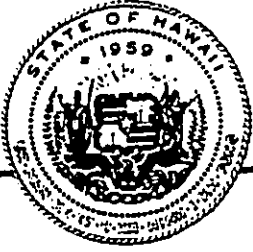
A convention center for Oahu would be a shot in the arm to revitalize our tourist industry. For it would provide short-term jobs for the building trades, and also have a long-term effect by providing more service industry jobs for the residents of Oahu. Once the convention center has been built and put into operation, new jobs will be created as the finished product will be found inadequate to perform the functions necessary for a convention center of the 21st century. In addition, off-site jobs will also be created as the surrounding area's infrastructure will have to be upgraded and expanded to handle the increased demands. IF properly designed and prepared, a convention center at the Aloha Motors site would be the "Crown Jewel" of a revitalized Waikiki. However, a convention center placed at that site WITHOUT adequate planning would signal the death knell of Waikiki as a tourist destination. The "urban community dynamics" of traffic, zoning changes, housing, and telecommunications have to be addressed and planned for BEFORE ground is broken.

Data referred to in the DEIS is either flawed or outdated. Traffic flow projections for the intersection of Kapiolani and Kalakaua are based on presumptions that do not exist. In addition, the DEIS fails to address the impact the convention center traffic will have on Waikiki and surrounding communities. Moreover, zoning changes will take place in the vicinity of the convention center and as a result, traffic patterns will also change. Whether area housing will survive or not will also have a major impact on traffic within a 5-mile radius of the convention center. Finally, is the local telephone company able to provide a state-of-the-art telecommunications system for a 21st century convention center? These concerns and other questions need to be fully analyzed and discussed by the ENTIRE community that is to be affected by the construction of a convention center. In this way potential problems can be dealt with BEFORE they occur.

A more detailed analysis of the DEIS will be issued March 25.

Mahalo,

Rodger Snow, Coordinator



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Rodger Snow
Coordinator
The Ala Wai Gateway Tenants Association
1819 Lipeepee Street #M
Honolulu, Hawaii 96815

Dear Mr. Snow:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 11, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

We received a copy of you *Ala Wai Gateway Tenants Association News* (undated) with a notation of "AWGTA Comments on the DEIS - March 11, 1995." We concur that the convention center will have both short- and long-term economic benefits. In addition, we would add that the benefits could extend to the Neighbor Islands as a result of some displacement of Oahu visitors and with conventioners participating in pre- and post-convention vacations.

Regarding your comment that the convention center will be "inadequate to perform the functions necessary for a convention center in the 21st century", you give no specifics to supporting rationale. We can only state that the Hawaii'i Convention Center will be a state-of-the art convention center that will be beautiful in design and operationally functional when it is completed.

Off-site jobs will be created as businesses will be required to service the center and the attending delegates.

Regarding planning for the convention center, it should be recognized that the City has a Waikiki Master Plan that addresses zoning, housing and transportation in Waikiki and takes into account the convention center. As planning is an on-going function, the City is updating the Waikiki Master Plan and also preparing a Waikiki Regional Transportation Impact Study in which the Convention Center Authority is a

Mr. Rodger Snow
July 17, 1995
Page 2

participant. The Aloha Motors site has long been regarded as a primary site for the convention center and the City on two prior occasions approved a much larger private convention center complex on the site. Nevertheless, there is much uncertainty regarding future private actions and that of the City Council in any rezoning actions that will ultimately determine the future land uses in the area.

You make general comments about the inadequacy of the convention center, the "flawed or outdated" data used, the traffic projections being based on "presumptions that do not exist," "failure to address the impacts on Waikiki and surrounding communities." While we acknowledge your opinions, we cannot provide specific responses to such general comments. The documentation presented in the DEIS is clear and detailed and available for your scrutiny.

The Social Impact Assessment in the Draft EIS discusses potential changes in the areas identified as susceptible to change. Due to uncertainty as to when, where and what sorts of development may take place, there is little basis for devising a detailed traffic study examining the impacts such change may have. Based on comments received on the Draft EIS, including the City Department of Transportation Services (DTS), a projection of traffic conditions to the year 2005 (when the convention center is anticipated to reach its full stabilized operating capacity) will be included in the Final EIS. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan.

Your comment on whether or not "housing will survive" within a five mile radius of the convention center overstates the potential impact of the convention center on housing. Based on other comments received, we believe that you may have drawn this conclusion from the finding in the Draft EIS's Economic and Fiscal Assessment that the convention center would create a demand for 7,700 new hotel room-nights Statewide. The study in the Final EIS, however, has been revised and clarified based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. In the

Mr. Rodger Snow
July 17, 1995
Page 3

revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 conventioner days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room occupancy rates at the existing 28,414 hotel units on Oahu from 80 to 90 percent. Another 300 units would be effectively added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it is anticipated that visitors (other than conventioners) will continue to shift their demand to the Neighbor Islands which could be expected to absorb about 60 percent of this demand. The remaining 720 units could be met by development on Oahu, without rezoning, at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

While the demand for hotel rooms may not drive potential redevelopment, and the convention center will not be the sole cause of change of change to its neighborhood, it may serve as a catalyst for the redevelopment of neighboring parcels. According to the Social Impact Assessment, which has also been revised in the Final EIS, the stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses. The Social Impact Assessment identifies areas "susceptible to change" and the revised study presents an expanded discussion of secondary impacts, such as on redevelopment, and cumulative impacts, such as increases in property valuations.

The current design of the convention center has incorporated the very latest technology and we are assured that GTE Hawaiian Tel will provide the necessary telecommunication support facilities and services required for the state-of-the-art convention center.

Mr. Rodger Snow
July 17, 1995
Page 4

We did not receive the detailed analysis you mention would be available on March 25 and therefore are not able to comment further.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Earl Matsukowa
Wilson Okamoto & Assoc.
1907 South Beretannia St.
Hon, Hi. 96811.

NEIGHBORS of the
Aia-Wai



P.O. BOX 75542

Honolulu, Hawaii 96836

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC.

March 23, 1995

Dear Mr. Matsukawa,

Thank you for forwarding us a copy of the draft Environmental Impact Statement for the Hawaii Convention Center for our review.

Many versions of our comments have been circulated. For this reason, we would like it to be known that the attached comments are submitted as our official input to the DEIS.

In order to facilitate your response and to insure that our concerns are easily identifiable, we submit the attached comments and numbered questions for your individual written response.

Sincerely,

Charles Baum, Pres.

Sam Bren, Vice Pres.

-----WATER QUALITY -- Appendix ----B

DEIS: "the U.S. EPA Region IX office concluded that no remedial action was necessary under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)..." (pg. 5)

Comment: That EPA conclusion is based solely within the guidelines of CERCLA, which does not cover petroleum products contamination -- the major contributor of known hazardous contamination on the site.

DEIS: the chemical group, "halogenated volatile organic compounds (HVOCs, which includes vinyl chloride) were not considered..." (pg. 5)

Comment: Vinyl chloride is the only contaminant listed in the DEIS as exceeding the maximum contaminant level of 2 parts per billion.

1. What is the actual level of vinyl chloride found at the site?

DEIS: "the possibility remains that contaminated soils and localized pockets of groundwater are present, since subsurface samples were largely limited to areas where land use practices indicated contaminants might be found". (pg. 5)

DEIS: There is "potential for remaining soil contamination on site". "Although soil was removed from 10 areas of the site, other areas of the site were not investigated". (pg. 3-14)

Comment: The project's plan calls for excavations below the water table in three specific locations:
a. the utility corridor
b. the elevator shafts
c. the truck loading docks.

2. Do these three locations correspond directly to where subsurface samples have been taken and analyzed?

DEIS: The developer "has been instructed to prepare a hazardous materials contingency plan to be implemented in the event that contaminated SOIL is encountered". (pg. 3-13)

3. What is the contingency plan?

4. Does it include contaminated GROUNDWATER as well as the fore mentioned SOIL?

5. When will the contingency plan be made public?

6. Why was the contingency plan not included in the DEIS?

Comment: The contingency plan is intended to minimize delays in construction schedule should contamination be encountered.

7. How will construction crews be able to identify soil or water contamination in microscopic amounts?

DEIS: "additional groundwater sampling or perhaps monitoring may be necessary". (Ap.B, pg. 6)

8. Will additional sampling in those specific areas subject to excavation above (soil) and below (groundwater) the water table be done?
9. Will there be continuous monitoring by an independent qualified technician?
10. Will an application of a starch/water spray during excavation to "stick" the soil be applied to minimize potentially contaminated airborne fugitive dust?

-----AIR QUALITY -- APPENDIX E-----

DEIS : "Estimates of eight hour concentrations (of carbon monoxide) can be derived by applying a 'persistence' factor to the one hour concentrations". (Ap.E p. 20-23)

DEIS : "EPA has in the past (emphasis ours) recommended calculation of a persistence factor based on actual 1-hour and 8-hour CO measurements, or in the absence of such data, use of a 0.6 value." Reference [22]

Comment: The reference [22] cited is dated 1978. This coupled with the curious inclusion of the phrase "in the past" prompts us to ask:

11. Does the EPA STILL recommend this same procedure?

Comment: The EPA recommended "persistence factor" of .6 shows the projected levels of CO to exceed the State & Federal Limits for both 10,000 and 14,000 events during the am & pm peak hours. (pg.23, table 4)

12. What are the consequences of exceeding the Federal carbon monoxide standards?

Comment: The DEIS study uses a persistence factor of 0.5. By using a persistence factor other than that recommended by the EPA (questionable validity), estimated levels drop to barely within Federal standards and still exceed State DOH standards.

13. Why does the DEIS use a persistence factor other than that recommended by the EPA?

14. What are the consequences of exceeding the State carbon monoxide standard?

Comment: The 8-hour CO projections are based on outdated CO data. Data used to input into the modeling program was from 1984 and 1987 respectively. Telephone inquiry at DOH Clean Air Branch indicated that data from 1990 should have been used.

15. Why wasn't more current data used?

Comment: In addition, the methodology employed to derive the 8-hour CO estimates used data collected in Waikiki at 2131 Kalakaua Ave. Also by telephone inquiry, it seems that the data collected at the Waikiki location is intended to reflect the ambient CO levels at that location.

16. Does measurement taken at THAT location realistically reflect the conditions at Kapiolani & Kalakaua; which according to the Atlas of Hawaii has the worst air quality in the state?

Comment: These results, even after questionable manipulation, still indicate that the traffic configuration at this site is unacceptable as planned according to State limits for pollution.

17. Do these environmental conditions reflect a situation that reflects the desired "Hawaiian Sense of Place"?

-----NOISE IMPACT STUDY -- APPENDIX F-----

Comment: We find several inconsistencies and unsubstantiated assumptions in this study. We believe that some of the conclusions and summarized results are implausible and do not reflect true existing or projected noise conditions.

DEIS : "Noise levels typical of communities on Oahu are shown in FIGURE 1." (Appendix F, pg.4)

18. How were these "typical" noise levels determined?

DEIS : "For the purpose of determining noise acceptability for funding assistance from federal agencies (FHA/HUD and VA), an exterior noise level of 65 Ldn or lower is considered acceptable." "...an exterior noise level of 65 Ldn does not eliminate all risks of noise impacts." (Ap.F pg. 4,7)

Comment: The Federal Environmental Protection Agency recommends a level of 55 Ldn in Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. This lower noise level is considered to be the "Unconditionally Acceptable" (or "Near-Zero Risk") level of exterior noise.

This study and the summaries in the DEIS use the higher noise level to determine what is considered acceptable. This higher level is used for determining funding assistance -- NOT PUBLIC HEALTH AND WELFARE.

19. Why does this study use the 65 Ldn instead of the proper 55 Ldn?

20. How would using the 55 Ldn maximum change the acceptability of the conclusions?

DEIS : Existing traffic noise levels were measured...along six public roadways which will service the proposed development". (pg.8)

Comment: Although Kahakai Drive is listed as one of the roadways that services the project, inspection of Figure 2 on pg.9 which shows the locations of the noise measurements does not indicate a measurement taken on Kahakai Drive -- the street most highly impacted by the project! The locations shown on Figure 2 show widely separated sites with NO MEASUREMENT TAKEN AT THE INTERSECTION OF KALAKAUA & KAPIOLANI, NOR AT ATKINSON & KAPIOLANI.

21. Why were receptors located so far from critical areas and noise sensitive properties?

22. How would the conclusions of this study change if receptors were located at sites closer to the noise sensitive properties involved?

Comment: Methodology for the study cites 8 noise receptor sites on roadways that will service the proposed development.

23. Why was no noise receptor located on Kahakai Drive in proximity to the heavy truck entry and exit?

24. Why was no noise receptor located near the automobile entrances and exits for the convention center?

25. Would locating receptors in those locations have given different existing noise levels?

26. Would the overall change figures summarized by location in the study have been effected by locating receptors at the above mentioned locations? If so, how?

DEIS : "Noise measurements were performed during the month of November 1994 and were performed during both the midday and PM peak traffic hours." (pg.8)

"The noise measurement results...are summarized in Table 2." (pg.8-11)

27. What, in this study, is considered "peak hours"?

We find in other sections of the DEIS, that peak hours are considered: am 7:15-8:15; pm 4:30-5:30; midday 1:00-2:00 pm.

28. Why were no measurements taken during the morning peak period at all?

Of the 11 measurements listed in the text as being taken at peak hours, only 4 overlap a peak period; only 1 is entirely within a peak period.

29. How does this affect the results drawn from the study?

30. Are we seeing accurate peak period results?

Comment: We find also, that some measurements were taken on Monday, some on Tuesday, some on Wednesday and still others on Thursday.

31. Why were none taken on Friday?

32. How does this inconsistency effect the results, projections and conclusions of this analysis?

DEIS : Existing and predicted noise levels were calculated using Federal Highway Administration Noise Prediction Model.

Comment: This method is 17 years old, dated 1978.

33. Is this the current method of choice for the conditions existing at the project site?

34. Is this the most suitable methodology to have used?

DEIS : Traffic assignments used as the primary sources of data to enter into the noise prediction model were based on:

a. The Traffic Management Consultant based on Wilbur Smith Assoc., based on a "generic" convention center.

b. "Hawaii state DOT traffic counts on Kalakaua Ave." (at the bridge at the canal, not the intersection) (Wednesday, Sept. 28, 1994)

c. City traffic count of inbound traffic at Kalakaua & Kapiolani (Tuesday, May 19, 1992)

35. Is the use of the "generic" data valid?

36. Is the use of traffic count at the bridge comparable to traffic data at the intersection?

37. Is an inbound only count of traffic valid for use at the intersection?

DEIS : "...it was assumed that the pm peak hour was 2.7 dB less than the 24-hour Ldn. This assumption was based on computations...of traffic noise at the Kapiolani Boulevard/Kalakaua Avenue intersection (see Fig.3 pg.12)" (pg.8)

Comment: The above assumption for the intersection is based on Figure 3 which is noise measured at the Ala Wai Bridge NOT AT THE INTERSECTION.

38. Is this a valid assumption based on two different locations?

39. Does the effect of the water and the canal have any bearing on these figures?

DEIS : "It was assumed that the facility would be acoustically designed to comply with local noise regulations..." "Therefore evaluation of special noise mitigation measures associated with vehicular and mechanical noise emissions from the project site were not included in this study. (emphasis is ours). (Ap.F pg.3)

Comment: We believe this is a false assumption and therefore invalidates some of the conclusions drawn from this noise study.

An exposed, open driveway for truck ingress and egress is situated on the property running parallel to and in very close proximity to the adjacent residential property.

Mitigation of on-site noise generation is assumed to be controlled by the project being "acoustically designed" to comply with local noise regulations". The truck ingress and egress driveway is not enclosed within the building, is exposed to

adjacent residential property and public park, and spans about half of the Kahakai Drive frontage of the project.

40. Why was this aspect of the project not "acoustically designed" to attenuate this noise condition that the project will generate from within the project site?

DEIS : The figures listed in tables 3 A-F use volume, speed, and vehicle mix to estimate current and future noise levels. The vehicle mixes are "assumed".

41. What are these vehicle mix assumptions based on? No reference is given.

Comment: Twenty miles per hour is the speed figure used for Kahakai Drive. Twenty miles per hour is not the likely speed of heavy trucks maneuvering on the open truckway on the project site. Heavy trucks at lower speeds use higher engine RPMs in first and second gears, generating higher noise levels.

42. How would lower speed assumptions on Kahakai Drive affect the results of the study?

The study uses Ldn rather than Leq because it assumes that heavy trucks do not exceed 10% of total traffic in a 24 hour period.

43. Shouldn't the Leq have been used since heavy trucks will exceed 10% of the total traffic on Kahakai Drive on set up and take down days preceding and following an event?

44. How would the results have changed if the hourly equivalent (Leq) were used instead of the day/night 24 hour average (Ldn)?

DEIS : Mitigation of off-site traffic noise is left to individual property owners. (Close your windows and use air conditioning is one suggestion) "The use of low engine RPM during acceleration to minimize noise impacts" and "minimizing high-speed idling of parked buses" and trucks are other mitigating suggestions.

45. How can trucks use low engine RPM during 1st and 2nd gear acceleration or while maneuvering the three turns required to finally enter the facility?

DEIS : Mitigation of off-site traffic noise is left to individual property owners. The DEIS states "management of the bus traffic during these events is recommended to minimize noise impacts on surrounding noise sensitive neighbors". (pg.32)

46. How does "management" mitigate noise impacts?

47. How are these "mitigating" solutions effective?

DEIS : Table 6 predicts reduction or no change for ALL NOISE SENSITIVE LOCATIONS based on the "shielding effect" of the project itself. p.29-31

Comment: The "shielding effect" of the project cannot "shield" the noise generated by 50 heavy truck trips in, and 50 heavy truck trips out of the facility (p.i-22) plus miscellaneous lighter truck trips at 5-10 trips (10-20 passes) per hour on Kahakai Drive itself or on the exposed truck driveway within the project site. No "shielding" exists for these noise sources.

48. What are the true impacts of truck noise on Kahakai Drive as opposed to the "shielded" level of traffic noise of Kalakaua Ave. furnished in the report?

49. How would the conclusion of "reduction or no change" cited above been different if receptors had been located at regular height intervals, ranging the entire height of the building, incorporating all living levels; rather than the inconsistent levels at each building listed?

Comment: Much is claimed about the shielding effect of buildings.

50. Has the echo effect been considered?

Comment: Sound is bounced off hard surface buildings all over this neighborhood. There is no mention of this effect.

Comment: The conclusion that noise levels will be the same or lower with a convention center is implausible to us no matter how the data is manipulated.

51. Shouldn't the open truck access roadway on the project site be completely enclosed from its point of entry on Kahakai Drive to the loading dock area?.

-----TRAFFIC IMPACT ANALYSIS -- APPENDIX I-----

52. Why does this study look at isolated intersections and disregard the regional effect of changes that effect other intersections?

53. Why doesn't this study include ALL intersections involved in the regular routing of convention center traffic?

We question the usefulness of this analysis.

In addition, this study makes the questionable assumption of 100% capacity and efficiency of the shuttle bus system.

54. Is this is realistically possible?

55. How would the results change if a 70% or an 80% capacity assumption were used?

56. Wouldn't these lower assumptions produce more realistic results?

57. How will the intersection of Kapiolani Blvd. & Kaheka St. be impacted by convention center traffic?

58. Makaloa & Kaheka -- Because of the pm coning on Atkinson Drive, in order to get to Kahakai Drive, it is necessary take Kalakaua, turn right on Makaloa pass Daiei, wait at light at Makaloa & Kaheka, turn left onto Kaheka, and wait for one car per cycle to turn left onto Kapiolani Blvd, so that you can finally turn right onto Atkinson Drive. It takes about 20 minutes to get from Daiei to Atkinson Plaza or Summer Palace Condominiums in the pm peak hour. How will this intersection be impacted?
59. Mahukona & Atkinson Drive -- This is the only D.H. exit from Ala Moana Shopping Center. How will the CC traffic affect the level of service at this signal used heavily by cars and buses?
60. McCully & Kapiolani -- the convention center will affect this intersection because more residents will use it in an attempt to circumvent the congested conditions at Kalakaua & Kapiolani. In light of this, how will this nearby intersection be impacted?
61. Keomoku & Kapiolani -- Currently, one car is able to turn left per green light cycle because pedestrians are crossing when green left arrow is lit. By the time pedestrians are gone, arrow is out and oncoming traffic exiting the shopping center is dominating the through traffic in the intersection. How will the CC traffic and coordination of signals affect this already problem intersection?
62. Kahakai Drive Loop & Kahakai Drive Proper -- uncontrolled & HIGHLY impacted intersection without ANY included mitigation. How will this intersection be impacted?
63. Hobron Lane & Ala Moana Boulevard -- part of the shuttle bus loop, and also subject to impact due to deterioration of service level at Ala Moana and Atkinson Drive. How will this intersection be impacted?
64. Ena Road & Ala Moana Boulevard -- part of the shuttle bus loop around Waikiki and back to the convention center. How will this intersection be impacted?

KALAKAUA & KAPIOLANI - 10,000 person event

DEIS

The widening and re-striping of the mauka-bound left turn lanes on Kalakaua to Kapiolani "improves" the left turn movement to LOS E (56.7 sec delay/veh). The volume to capacity ratio for this intersection becomes 1.079 (p.4-24)

Comment:

This means the capacity of the intersection is EXCEEDED by almost 8% leaving NO ROOM for additional traffic load created by the imminent development of VFW, Unical, the City tow lot, Hard Rock Cafe lot, Aloha Piano lot, all of which are situated directly at this intersection. This would appear, even to a lay

person, to be an unacceptable traffic situation, both in 1998 and for decades to follow.

65. What is the long-term effect of consuming the intersection reserve capacity?

The widening of Kalakaua Ave from the project to the canal represents a shifting of the congestion problem from the K & K intersection to the point where Kalakaua meets the bridge. This is not discussed in the traffic impact analysis.

66. What is the impact of this merging action?
67. Is the study simply ignoring that the bridge represents a bottleneck of traffic on Kalakaua Ave?

Comment: The study ignores the fact that the "mitigating" extra lane on Kapiolani and the "mitigating" widening of Kalakaua will create the need for FOUR lanes to merge into THREE lanes.

68. What is the impact of these merging actions?
69. What is the impact on the Kalakaua bridge from the additional stress of weight and traffic?

THE REQUIRED "MITIGATING" MEASURES DO NOT ADEQUATELY COMPENSATE FOR THE OVERLOADING OF THE INTERSECTION.

70. How will this overloading be corrected?

ALA MOANA BOULEVARD & ATKINSON DRIVE for 10,000 event:

DEIS: Ala Moana & Atkinson /pm LOS degrades from LOS D to LOS E. (p4-27)

Comment: This should be considered one of the more serious traffic impacts revealed in the study. This intersection may be the most seriously changed by the convention center traffic problems.

71. Why are no viable or practical mitigating solutions offered?

The degradation of service at Ala Moana & Atkinson will have a ripple effect on intersection of Atkinson and Hobron Lane.

72. What is the impact on this intersection?

Comment: Conditions at Ala Moana and Atkinson are further degraded for a 14,000 person event. No practical or effective mitigating solutions are offered. For this size event, both am and pm service at this intersection are degraded to undesirable conditions. These conditions should be considered unacceptable.

73. How will this intersection accommodate further development in the Hobron area if its capacity is being "consumed" by convention center traffic?

Comment: There will be no accommodation at this intersection for future growth of the Hobron area.

74. What is the impact on the private property value and tax base to the city if future development must be limited in the area because of traffic jams created by the convention center?

DEIS : The analysis of a Friday evening 3,000 person event does not consider the intersection of Ala Wai Boulevard & Kalakaua Ave. (pg.4-51)

75. What will be the impact on this intersection under these conditions?

Comment: The service at Ala Moana Blvd. & Atkinson Drive is more seriously degraded under this scenario. East AND westbound turning actions would operate at LOS F. (pg.4-51) "Mitigation" consists of temporary signing and coning to create a right turn only lane from Ala Moana Blvd. to Atkinson Drive.

76. Where do the necessary lane changes take place for those vehicles NOT WISHING to turn right at Atkinson Drive?

77. What effect will this have just D.H. of the intersection?

78. Where and how will signing be accomplished?

79. Will signs be visible and intelligible at night?

80. What is the visual impact of all of this signage?

81. The data in table 4-12 contradicts the information given in the text under Section d of pg 4-53. The table says service "with mitigation" is improved to LOS D from LOS E, while the text says service is improved to only LOS E (with mitigation) from LOS F (without mitigation). Which is correct?

Comment: This intersection is so seriously impacted under this scenario that it is difficult to believe that "informational signs" will be sufficient to restore order and efficiency to this important intersection.

ALL LOCAL EVENT

DEIS: During an all-local event, the LOS at Kapiolani & Atkinson degrades to LOS F with capacity exceeded by almost 20%! "Mitigating" action calls for west-bound contra-flow coning to Kaheka St. (pg.4-56)

Comment: This coning operation appears to be in conflict with east-bound contra-flow for pm rush hour traffic.

Comment: Post commuter hour begins at 6:30, cones for the pm commuter east bound traffic are up until 6:30 at the Atkinson & Kapiolani intersection.

82. How does this transition occur?

83. TWO OPPOSITE CONING OPERATIONS APPEAR TO OVERLAP OR AT BEST END AND BEGIN AT THE SAME TIME. Is this possible?

84. What impact on peak hour traffic will the coning trucks have?

DEIS: mitigating action of "dual left turn lanes" from Kapiolani to Atkinson

Comment: TWO left turn lanes onto Atkinson Drive must merge into ONE left turn lane into Kahakai Drive at a short distance from the intersection. (pg.4-50)

85. How does this merging action affect queuing at the Atkinson & Kapiolani intersection?

DEIS: "Mitigation" also calls for "informational signs" directing motorists to by-pass the Atkinson Drive intersection and continue on to the Kalakaua garage entrance.

86. Since this is a night-time operation, will signs be lit, visible, comprehensible at the most congested intersection in the city? Where will the signs start?

87. What impact will this have on the Kaheka/Kapiolani and Mahukona/Atkinson intersections?

88. Will the signs be removed after the event?

DEIS : Coordination of signalizations is required to prevent queuing on Atkinson Drive back to Kapiolani. (pg.4-57)

89. How does this coordination affect the intersections surrounding and connected to the Atkinson & Kapiolani signal?

90. How does it affect all intersections in the "loop"?

Comment: The intersection of Atkinson Drive and Ala Moana Boulevard is severely impacted by just about any function at the convention center. No mitigating actions are included in the project. No mitigating solutions are evident.

The serious consumption of the capacities of the surrounding intersections coupled with the imminent redevelopment of the area around the convention center forecasts major problems that are just not being ~~considered~~ ~~planned~~ ~~developed~~. Restrictions have to be imposed in the immediate area in order to prevent the strangulation of Waikiki and the convention center area.

-----PARKING-----

DEIS : Table 4-15 suggests the employee use of only 83 parking stalls for all convention scenarios.

91. For a Friday evening event, which is likely to include banquet operations, where are the approximately 200 food service employees going to park?

Comment: The parking demand is highest on Friday evening 3,000 person event or 1800 all local event. This coincides with the time when

much of the local street parking has been eliminated in order to "mitigate" the traffic congestion.

92. How will the Friday evening parking crisis be addressed?

-----TRUCK & SHUTTLE BUS ACTIVITY-----

DEIS : Truck activity -- what are the anticipated times for truck arrivals and departures "in the morning" or "the early evening" as stated in the DEIS? (pg.4-61)

93. Will trucks arriving and departing create early morning and night time disturbance to nearby residential properties? What are the hours of operation, including trucking in and out of the facility?

94. What will be the operating hours of the convention center building, including janitorial, food preps,?

95. Is there activity in or around the convention center 24 hours a day during set ups and take downs?

Comment: It is calculated that 122 bus trips (assuming the unlikely 100% capacity and efficiency) into the CC are required in the am peak hour, with a bus arriving every 30 seconds. This means that a bus should also be leaving every 30 seconds.

Comment: This "calculation" reflects the extremely unlikely factor of 100% capacity and efficiency of the shuttle bus operation. A more realistic figure for capacity and efficiency would yield a significantly higher number of bus trips.

96. What is the impact of the bus merging action? How will this situation be corrected?

Comment: Nevertheless, this shuttle bus activity creates a virtual intersection where the drop-off area rejoins Kapiolani Blvd which is an uncontrolled situation. This configuration requires buses to break into existing traffic flow on Kapiolani

97. How will this be controlled? How will it affect the Kalakaua and Kapiolani intersection?

Another virtual intersection is the convergence of the new "mitigating" lane on Kalakaua with the existing flow of traffic over the Kalakaua bridge. Again, these 122 busses will have to break into traffic at the bridge by changing lanes at the end of the project site in order to cross the bridge.

98. How would the merging action inherent in the "mitigating" lanes affect the results of this study if they had been evaluated?

-----PEDESTRIAN ACCESS AROUND THE SITE-----

The highest volume of pedestrians will likely use the Kalakaua bridge. Pedestrian conditions at the bridge are unacceptable for the proposed high volume use. Relocation of the

2 poles interrupting flow would improve service to barely minimal conditions (12.9 PMF out of 15 PMF (unacceptable)). This allows for minimal conditions and little room for future development of the surrounding properties (which is imminent).

Other mitigating improvements suggested:

1. widening the bridge -- not possible -- DOT class 1.

99. Why is it suggested to widen this bridge when it was published in the EA that the bridge is historic and must be preserved?

2. new bridge next to existing -- unlikely to be approved.

3. New bridge at Lepeepee street:

The proposed bridge as indicated, terminates at an existing condominium building lobby.

100. What are the impacts of this bridge on the residential communities on both sides of the canal?

Sidewalks on the DH side of the canal are not adequate to accommodate the quantity of pedestrians proposed to use the neighborhood as a route to the pedestrian bridge.

101. Who will pay for this bridge? What problems is it going to create for the Hobron community, for the Kahakai Dr. community?

102. What is the reason for locating a pedestrian bridge at that location? Are there underlying reasons not discussed in the current plan?

103. Why have sidewalks been eliminated along project's Kahakai Drive frontage?

According to plan, pedestrian access to the Summer Place Condominium and residential properties on Kahakai Drive have been severely restricted. The setback of the project on Kahakai Drive is only five feet and does not include pedestrian access to the residential properties beyond the project site.

In addition, the existing crosswalk across Atkinson Drive at Kona Street is proposed to be relocated to the other side of Kahakai Drive in front of the convention center (CC) lobby. In overview, the crosswalk is being shifted to the side of Kahakai Drive where the sidewalks have been eliminated. Although this plan serves the CC well, it will require six street crossings for a pedestrian to reach the nearest access to food and drug stores in the vicinity and at Ala Moana Center.

With imminent development of consolidated properties on Kahakai Drive, construction perimeter fences will likely abut the only remaining narrow sidewalk on the loop. We believe this presents undue hardship and danger to the elderly, the handicapped, and those pedestrians accompanied by children. This

pedestrian plan must be improved to better accommodate the neighboring residential community.

104. Because the City requires sidewalks on the convention center frontage on Kahakai Drive, what plans are there to include this requirement?

-----SERIOUS DESIGN RELATED PROBLEMS-----

Comment: Impeded Vehicle ACCESS to Kahakai Drive
The traffic mitigation for Kahakai Drive being used as the main ingress and egress to the CC project is provided by widening the road to form two lanes in and two lanes out.

Comment: However, since cars are permitted to park in the 5 stalls on the makai side, fronting the project, ingress will be reduced to only one lane in.

Spill-over of cars waiting to be processed at the parking garage will cause queuing on Kahakai Drive from Atkinson Drive to the convention center entry ramp. The reduction of Kahakai Drive to one ingress lane is insufficient to guarantee unimpeded access to Kahakai Drive through traffic and emergency vehicles.

105. What will be done to correct this situation?

Comment: We understand that on-street parking is already over-burdened in the area, however the elimination of these 5 stalls is of equal or greater importance as the other stalls already being eliminated by the project. Although the DEIS calls for event-related control of these 5 stalls, the situation could arise AT ANY TIME when there will be cars parked in one lane while the other lane is congested, RESULTING IN DENIED ACCESS OF EMERGENCY VEHICLES TO KAHAKAI DRIVE as well as to regular residents and visitors to the Kahakai Drive loop.

106. What plans have been made to reroute emergency vehicles TO Waikiki during peak convention center congestion?

107. In the event of an emergency, if emergency vehicles were denied access because of convention center traffic congestion, would there be a case of negligence and liability on the part of the state and/or city by reason of foreknowledge of the potential danger without action to prevent such danger.?

Comment: It is unfortunate and inconvenient, nevertheless, these five stalls must also be sacrificed to the CC project in order to MAINTAIN A DEDICATED THROUGH LANE TO KAHAKAI DRIVE.

108. What is the impact on the residential community of having to eliminate so much on street parking as a result of overcrowding imposed by the convention center in a residential neighborhood?

Vehicle EGRESS Severely Impeded from Kahakai Dr. T-Intersection

Due to the one-way loop configuration of Kahakai Drive beyond the project site, vehicles wanting to exit Kahakai Drive from any point other than the convention center, must travel around the loop and turn left back onto the 2-way section of the road. This left turn requires cutting across four lanes of convention center traffic at an uncontrolled intersection. This means waiting for a simultaneous break in inbound and outbound convention center traffic simply to queue up for the proposed signal at Kahakai Drive and Atkinson Drive. Queuing will prevent easy reentry onto Kahakai Drive and queuing will occur on the loop as well.

109. How will the uncontrolled T-intersection on Kahakai Drive be improved to allow residents to freely egress?

DEIS: Mitigation measures offered: a mere suggestion that traffic should be managed on an "event-related" basis by an employee of the convention center.

Comment: Even if there were a full-time traffic director at that intersection, his job priority would be to move vehicles OUT of the convention center.

110. If the "event-related" convention center employee is unable to manage traffic at the T-intersection to the satisfaction of the residential community, what will be their recourse?

111. How will traffic flow be prioritized?

Residents are held hostage by convention center traffic which has been given the right of way.

112. How will this be corrected?

This plan is grossly inadequate and requires careful reconsideration and modification. The Convention Center Authority and designers should acknowledge that most of the small residential low-rise units have been consolidated and will probably be replaced with more vehicle intensive uses in the very near future.

---TRUCK INGRESS & EGRESS FROM CC LOADING BAYS & SERVICE AREA---

DEIS : A review of Figure 2-5 (Ch.2 Project Description) shows the convention center building south and west elevations. The Summer Palace Condominium building is included in the south elevation of the project but excluded from the west elevation of the project.

Comment: Closer inspection of the 30% architectural drawings reveal that the heavy truck access to the convention center is simply an OPEN ROADWAY running parallel to the Summer Palace just over the property line. Heavy trucks finally enter the facility only 30 feet or so from the Ala Wai Park promenade through a combined garage opening approximately 75 feet wide. This presents a major

problem for the Summer Palace Condominium, for the general public using the Ala Wai Park, for conventioners approaching the CC on the promenade from the Ala Moana direction, and to the residents of the Marina Towers Condominium directly across the canal from the open heavy truck roadway.

113. How will this issue be resolved? Will those affected know that the plan has been changed? Will they be advised?

DEIS: During off-peak hours, 10 truck trips per hour translates to 10 trips in and 10 trips out, totalling 20 passes on Kahakai Drive and the exposed truck driveway on the project site.

Comment: Since the truck driveway is within the site, DOH property line noise limits will apply to the truck driveway and the noise generated by these heavy vehicles.

114. Is it possible for heavy trucks to comply with DOH standards of 60 dB daytime and 50dB nighttime?

115. Will it not cost much more to attenuate this sound problem once the building is built?

116. Will design modifications be made on the south west corner of the project in order to better achieve the promised "sensitive good neighbor" approach that was intended?

117. Will the unpleasant aesthetics of having an open view of the CC service area from the park and the canal be redesigned to assure that the convention center building is not offensive from any vantage point - public or private?

118. What provision has been made for cost overruns such as complete enclosure of the truck road on the convention center site?

119. How will convention center project be affected by insufficient budget allowances resulting in compromised design?

120. What protective measures, other than that the facility will have its own security, are intended to control increased crime and crime related problems in the immediate area as a result of locating the convention center in the most densely populated area of Honolulu?

-----IMPACTS TO PUBLIC PARK AND RECREATION FACILITIES-----

DEIS: The DEIS make little mention of the encroachment onto the Ala Wai Park Promenade. The historic tree planting will be disturbed and a large stairway and other structural elements will be built on park land.

121. What are the consequences of attempting to build on historic park land?

Comment: Coconut trees will be introduced into an historic continuous planting of large canopy shade trees.

122. What will the result of the loss of integrity of the historic landscape have on the park's eligibility for protection under the National Historic Preservation Act?

123. How can the project design be modified to not encroach on park land?

Comment: We do not agree with the Convention Center Authority having usurped public park land to use as an adjunct to the convention center.

124. How does the Convention Center Authority justify using the Ala Wai Park to accommodate a facility that is simply too large to be accommodated on its own piece of land?

125. Is the Aloha Motors site too small to accommodate a world class convention center without literally spilling out onto park land, public sidewalks and streets?

Comment: It is of great concern the way the term "improvement along the project frontage" is used in conjunction with the Ala Wai Park Promenade.

126. What EXACTLY does improvement mean? Does it mean extensive paving?

127. Will the park be used as an extension of the convention center?

DEIS: The DEIS says that the park will be "extended" into a terraced garden.

128. Will the "extended terraced garden" be open to the public at all times?

129. Will the "terraced garden" be closed during the ~150 days that the convention center is not expected to be open?

Comment: The impacts to the Ala Wai Park have been minimized in the DEIS and have not been fully disclosed. More complete plans for the "improvements" should have been disclosed in the impact analysis during the public review period.

130. What is the total square footage of structural elements that will encroach on the park?

131. What percentage is that square footage relative to the park land that fronts the convention center project?

132. What percentage of paving will replace what is currently unpaved?

133. Will the paving be porous to allow for drainage and irrigation of the tree roots in a wide diameter?

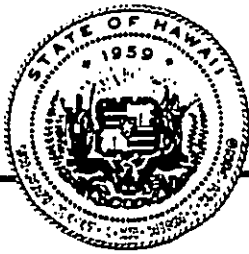
134. How will the trees be protected from damage from heavy equipment during construction operations in the park itself?

135. How will the tree roots be protected from compaction both during construction and during use of the convention center?

136. Is the park plan and building plan shown in the DEIS the final plan as of 3/25/95?
137. If there are modifications to the park and building plan after 3/25/95, what provision will be made for public review?
138. What is to become of the remainder of the park, makai of the "improved" section along the project's frontage?
139. Will it be simultaneously "improved" by the city?
140. Are the plans being coordinated to insure continuity of the park design?
141. Has the State made a commitment to finance the necessary improvements along the remaining length of the park?
142. Will those improvements be complete by the opening of the convention center?

Comment: We believe that the convention center should not have encroached on public park land. The project could have made use of the promenade as a pedestrian access without having intruded on the park to such a great degree.

143. Why was this site chosen if it could not accommodate the required interior square footage without overcrowding everything around it?
144. Have any attempts been made to modify the design in order to satisfy the declaration of DLNR?
145. Had alternatives been sought before designing onto public sidewalks and public park land?



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Charles Baum
President
Mr. Sam Bren
Vice President
Neighbors of the Ala-Wai
P.O. Box 75542
Honolulu, Hawaii 96836

Dear Mr. Baum and Mr. Bren:

Subject: Hawaii Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments and questions:

Water Quality -- Appendix B

First and Second Comments (preceding no. 1.) and 1.:

You are correct that the Environmental Protection Agency's (EPA) conclusions are based on the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) which does not cover petroleum products. Petroleum is covered by the Resource Conservation and Recovery Act (RCRA) which, at the project site, is administered by the State Department of Health (DOH). As noted in the Draft EIS, both the EPA and the DOH expressed that adequate remediation had been performed for known contamination under their respective authorities.

Again vinyl chloride is not covered by CERCLA.

As stated in the Draft EIS, vinyl chloride exceeded the EPA's Maximum Contaminant level in the northeast corner of the site.

Vinyl chloride was found only in the northeastern corner of the project site, near the corner of Kapiolani Boulevard and Kalakaua Avenue. Although initial sampling revealed concentrations above the EPA Maximum

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Concentration Level (MCL) of 0.002 mg/L, remedial actions were subsequently undertaken to reduce the levels of vinyl chloride and other halogenated volatile organic compounds. The latest sampling results showed vinyl chloride had been reduced to the MCL levels (0.019 to 0.002 mg/L).

Comment (preceding no. 2.) and 2.:

Although they were not intended to analyze specific locations relative to future convention center development, several of the monitoring wells and/or excavated pits for subsurface sampling, analysis and clean-up have been undertaken along and beneath areas that are now planned for the utility corridor, elevator shafts, and truck loading dock areas.

3. The contingency plan being developed will include provisions for:
 - cessation of work in the immediate area of encountered or suspected contamination;
 - notification to the State Department of Health (DOH) and State Convention Center Authority (CCA);
 - approval of planned remediation actions by the DOH;
 - approval of clean-up work by the DOH before construction proceeds in the affected area.
4. Contaminated groundwater, as well as soil, will be subject to remediation.
5. The contingency plan will be finalized prior to the start of construction and furnished to the DOH and the CCA.
6. The contingency plan was not included in the Draft EIS since it is yet to be finalized.

Comment (preceding no. 7.) and 7.:

Construction crews will not be able to identify soil or water contamination in microscopic amounts. We believe, however, that all reasonable precautions relative to hazardous materials have been taken. Forty (40)

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monitoring wells were installed throughout the site, and pits excavated where contamination was detected, resulting in the removal of over 3,700 tons of soil. An independent hazardous materials consultant has concluded that there does not appear to be a pervasive groundwater contamination problem beneath the site. The EPA has noted that the groundwater and soil cleanup levels are protective of public health. The DOH, as well as the EPA, have approved the remediation efforts and have not required any additional pre-construction assessments.

8. For the reasons described above, no additional sampling in the areas subject to excavation above and below the water table will be undertaken.
9. Continuous monitoring by an independent qualified technician is not warranted based on the remediation efforts and approvals obtained to-date.
10. Fugitive dust during grading and construction operations will be controlled by a program of watering and the application of gravel, as needed, in more heavily trafficked areas. In its letter of March 6, 1995 to Mr. Charles Baum, the EPA noted that "construction activities for the convention center should not result in appreciable risk to nearby residents from exposure to soil".

Air Quality -- Appendix E

Comment (preceding no. 11.) and 11.:

The preferred method of computing the persistence factor is still based on the use of Carbon Monoxide (CO) monitoring data in the vicinity of the site (EPA-454/R-92-0005). As indicated in the Air Quality Impact Report (Appendix E, Page 23), both this study and previous studies have computed persistence factors based on local CO data and found values in the 0.5 - 0.6 range. EPA default values are only recommended in the absence of local monitoring data.

Comment (preceding no. 12.) and 12.:

If exceedances of the Federal CO standard(s) are verified by monitoring, then the Federal Clean Air Act, Section

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186, specifies a series of actions that a State must take. Exceedances predicted by modeling do not trigger such actions.

Comment (preceding no. 13.) and 13.:

The Draft EIS did use an EPA-recommended persistence factor. As indicated in response no. 11, the recommended procedure for developing a persistence factor is by using local CO monitoring data. The default value is only recommended by EPA in the absence of local monitoring data.

14. The State does not have the same specific actions for exceedances of its CO standards as does the Federal government. The State does have enforcement authority pursuant to Chapter 342-B, Hawaii Revised Statutes, if exceedances are measured.

Comment (preceding no. 15.) and 15.:

Data input to the CAL3QHC model included traffic projections, the latest MOBILE-5A emission factors, and "worst case" meteorology. CO Data for 1984 or 1987 were used only to compute persistence factors. Since such factors are in large part a function of local meteorology, no significant year-to-year differences were expected. In response to your comment, however, the latest available CO data for the Waikiki station (1993) was obtained from the DOH. The computed persistence factor based on that data set was 0.47, somewhat lower than the 0.5 to 0.6 cited by the Air Quality Impact Report. The revised analysis will be included in the Final EIS air quality study.

Comment (preceding no. 16.) and 16.:

The use of CO data from a nearby site to compute a persistence factor is acceptable and appropriate. Rarely will one have a CO monitoring station located at the site of a proposed project. In this instance, we were fortunate to have the Waikiki station so close. In most cases in Hawaii, none would be available. The persistence factor is simply a ratio of the highest 8-hour to 1-hour CO concentrations and reflects traffic volume and meteorological conditions throughout the 8-

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hour period. When the 1993 data for the CO station at the DOH building on Punchbowl Street was analyzed, a value of 0.40 was revealed. The prevalence of trade winds tends to make the ratios lower because the morning calm conditions which produce the maximum 1-hour CO levels do not persist for 8 hours. As for the Kalakaua Avenue/Kapiolani Boulevard intersection having the "worst air quality in the State", we believe that reference was based on modeling and not actual measurements.

Comment (preceding no. 17.) and 17.:

As noted above, the analysis, based on standard EPA methods, predicted possible exceedances of State CO standards under worst case conditions at the present time and in the future with the convention center. The predictions represent the rare event, and not the average or typical event. The actual probability of any violations actually occurring appears very low as indicated by the DOH monitoring data at Waikiki.

Noise Impact Study -- Appendix F

Comment (preceding no. 18.) and 18.:

These "typical" noise levels (Appendix F, page 6, not page 4) were determined by measurements.

Comment (preceding no. 19.) and 19.:

The 65 Ldn is the proper acceptability threshold for evaluations of traffic noise, particularly when existing background ambient noise levels are significantly higher than 55 Ldn.

20. If 55 Ldn was used as the threshold of acceptability for noise, one conclusion that would result is that the number of residences presently exposed to unacceptable noise levels would be much greater. The conclusions regarding the changes in noise levels attributable to the project traffic (or cumulative noise impacts) should not be different from the noise study's conclusion.

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Comment (preceding no. 21.) and 21.:

Traffic noise measurement locations were selected to minimize possible errors in traffic noise model calibration efforts. A measurement location near a noisy intersection does not allow for accurate model calibration of traffic noise along a roadway. Also, the presence of the existing temporary plywood wall around the project site would not have allowed for model calibration near the intersection. Noise model calibration along Kahakai Drive was not possible due to the reflections from the existing plywood walls and the noise masking effects from traffic on Atkinson Drive, since existing traffic noise contributions from Kahakai Drive are too low for model calibration.

22. The conclusions of the noise study would not change, as long as the new traffic noise measurement locations allow for equally accurate noise model calibration.

Comment (preceding no. 23.) and 23.:

- See response no. 21 above.
24. See response no. 21 above.
25. See response no. 22 above.
26. See response no. 22 above.
27. The actual time periods of the peak traffic hours were determined as part of the EIS traffic study, which were as stated in your comment. For noise analysis purposes, the peak hour time periods and traffic volumes were identical to those provided by the EIS traffic study.
28. Traffic noise model calibration efforts during the AM peak hour had been previously performed in June 1989 and reported for the Honolulu Convention Center (First Development, Inc.) Noise Study. Additional AM peak hour measurements were not considered necessary for model calibration efforts.
29. Traffic noise model calibration efforts need not occur during the exact time intervals of the AM or PM peak hours as defined for analysis purposes. In fact, the

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actual peak hour periods probably change slightly from day to day. This is why only one traffic noise measurement period coincided exactly within a peak period.

The reason only four of 11 noise measurement periods were obtained during the PM peak traffic period is that the remaining seven noise measurement periods were also considered to be equally important for noise model calibration.

30. Peak period noise levels are based on traffic volumes provided by the EIS traffic study and the results of the noise model calibration efforts. The results are estimated to be accurate to within 1 decibel (see Table 2, Pages 10 and 11 of the Noise Study).

Comment (preceding no. 31.) and 31.:

Traffic volumes tend to be provided on days other than Fridays, Saturdays, Sundays, and Mondays. Our traffic noise analyses attempt to be consistent with the available traffic information. Continuous noise measurements on the project site were previously obtained from 4:00 PM on a Friday (June 30, 1989) to 6:00 PM on the following Saturday during the previous First Development, Inc. noise study.

32. There is no inconsistency affecting the results, projections and conclusions of this noise analysis. We maintain that the noise study results are technically valid.

Comment (preceding no. 33.) and 33.:

The stated model is still widely accepted and used.

34. The most suitable methodology was used to conduct the noise study.
35. The traffic count data derived from the *Hawaii Convention Center Transportation Impact Assessment* prepared by Wilbur Smith Associates (WSA traffic study) for a "generic" convention center, was further validated for the *Transportation Impact Analysis Report* prepared for

the environmental impact statement (EIS traffic study) and adapted to the current convention center design. In the WSA traffic study, traffic volumes were obtained from special counts made by Kaku Associates and Cambridge Systematics, Inc. in 1992 for the rapid transit project and the Waikiki Master Plan study. These counts were updated and supplemented by counts made by WSA in March 1994 for key intersections.

Verification was made by manual traffic count surveys taken in 1994 by The Traffic Management Consultant (traffic consultant to the EIS traffic study) and the most recent available data from the City and County of Honolulu Department of Transportation Services (DTS) and the State of Hawaii Department of Transportation (DOT). Manual counts were conducted by The Traffic Management Consultant at specific intersections to verify critical turning volumes in the study area. We also point out that traffic volumes used in the EIS traffic study are consistent with the traffic data collected by Kaku Associates in February 1995 for the City's Waikiki Regional Traffic Impact Plan which is currently underway.

36. The traffic count at the Kalakaua Bridge should be comparable to the traffic data at the intersection of Kapiolani Boulevard at Kalakaua Avenue. The variations in the traffic data at these two locations could result from traffic generated by the Hard Rock Cafe (located between these two count stations), traffic data collected on different days of the week and different months of the year, and variations in traffic count data inherent in both manual and mechanically collected data.
37. The traffic volumes used in the noise study analysis are based upon both inbound and outbound traffic at the intersections which were obtained from the City DTS and the State DOT, respectively, and the EIS traffic study. Since the City DTS counts measure only inbound traffic, their data was used to verify the EIS traffic study approach volumes. Also, the City DTS' inbound traffic data was used to compare with the two-way traffic volumes on the Kalakaua Bridge. We note that both inbound and outbound traffic can be derived from the detailed turning movement counts at the intersections presented in the EIS traffic study.

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Comment (preceding no. 38.) and 38.:

We believe the assumed value of 2.7 dB to be the best and a valid estimate based on all available traffic data. The reasoning is as follows: the Figure 3 data (two-way traffic along Kalakaua Avenue) indicates a 2.7 dB value as recently as September 28, 1994. The traffic counts of the approaches to the intersection of Kalakaua Avenue and Kapiolani Boulevard (April 19, 1992) are the only available 24-hour traffic data (in addition, the traffic volumes for the noise analysis were based on the traffic volumes used in the EIS traffic study). However, the calculated factor for the Kapiolani Boulevard approaches resulted in a 2.08 dB value, and the calculated factor for the Kalakaua Avenue approaches resulted in a 3.34 dB value. The average of the two factors (2.08 and 3.34 dB) for all of the approaches to the intersection computed to 2.7 dB, which is identical to the factor shown in Figure 3 of the noise study.

39. The waters of the Ala Wai Canal have no bearing on the noise results.

Comment (preceding no. 40.) and 40.:

Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

41. The vehicle mix assumptions were based on traffic counts during the noise monitoring periods, as well as forecasts of future vehicle mixes with the operational convention center project.

Comment (preceding no. 42.) and 42.:

For the purpose of traffic noise modeling, the study considered a worst-case analysis by assuming a higher speed of heavy trucks travelling on Kahakai Drive. Lower truck speeds would produce more favorable noise results.

43. The study uses Ldn because it is the more widely accepted noise descriptor for noise impact evaluations. The Leq descriptor can be used during FHWA-sponsored roadway improvement projects' noise assessments, and during the acoustical design of special facilities.
44. The Leq was not evaluated in depth in the noise study. However, as shown in Figure 3 (page 12) of the noise study, Ldn values along the major roadways were assumed to be 2.7 dB higher than the PM peak hour Leq values.
45. Trucks can use low engine RPM during first and second gear acceleration since no steep grade changes are involved, and low vehicle speeds are expected during maneuvering at the convention center facility.
46. and 47.

You question how "management" of bus traffic mitigates noise impacts, and how are these "mitigating" solutions effective. Because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

Comment (preceding no. 48.) and 48.:

The impacts of truck noise on Kahakai Drive is approximately 54 Ldn as shown in Table 6 (Receptor Location 8, low-rise residences on Kahakai Drive) of the noise study. This is in comparison to the existing traffic noise level of 63 Ldn.

Based on the findings of the noise study, noise from convention center traffic will not be significantly greater for residents in the immediate area than it would be without the Center. The noise study indicates that although traffic volumes along Kahakai Drive are expected to increase, total noise levels on the sides of Atkinson Plaza and The Summer Palace condominium buildings which face the project are not expected to increase significantly, and are predicted to decrease at the lower elevations due to the noise shielding effects of the project's building on noise from other major streets in the area. Traffic noise levels along Atkinson Drive are expected to increase by approximately 1 Ldn due to increases in project and non-project traffic.

49. No significant change in the conclusions would result if noise receptors were located at regular height intervals. Low-rise residences will experience higher local traffic noise levels from Kahakai Drive, but lower distant noise levels due to shielding effects of the convention center building. High-rise residences would not receive the benefits of noise shielding from the convention center building, but they will be more distant from the Kahakai Drive traffic below. At worst, high-rise residences should not experience an increase in total traffic noise levels due to the relatively low contribution from Kahakai Drive traffic noise, when compared to the distant noise sources. Residences located in between the high-rise and low-rise receptors should be somewhere between receiving the maximum noise reduction benefits associated

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with the low-rise receptors, and the minimum noise reduction benefits associated with the high-rise receptors.

Comment (preceding no. 50.) and 50.:

The "echo effect" has been considered in the noise modeling efforts.

First Comment (preceding no. 51.):

You indicate that sound is bounced off of hard surface buildings all over the neighborhood, yet there is no mention of this effect in the noise study. We note that traffic noise associated with the convention center project should follow the same laws of physics (i.e., noise reflecting off of walls, rising in the air) as non-project or existing traffic. Therefore, the degree of increase or decrease in future traffic noise levels at a high- or low-rise receptor should be predictable from the changes in traffic volumes, speeds, and mixes, plus any noise shielding and reflection effects.

Second Comment (preceding no. 51.):

We do not concur with your opinion that "the conclusion that noise levels will be the same or lower with a convention center is implausible, no matter how the data is manipulated." According to the noise study (Table 5, page 27), minimal increases in traffic noise of 0.1 to 0.4 Ldn are predicted to occur along the sections of Kapiolani Boulevard, Atkinson Drive, and Kalakaua Avenue bordering the project site as a result of the convention center project. Smaller increases in traffic noise are expected to result from the project along Ala Wai Boulevard, the sections of Kapiolani Boulevard east and west of the project site, and the section of Kalakaua Avenue north of the project site. The largest increase in local traffic noise of 1.9 Ldn is expected to occur along Kahakai Drive, primarily due to the relatively low volume of existing traffic on this roadway. However, the noise levels associated with this roadway are expected to remain less than 65 Ldn. In addition, a net decrease in traffic noise levels at low and mid-rise receptor locations along Kahakai Drive is expected due to the future benefit of noise shielding from the project

building, which will reduce the noise contributions from traffic on Kapiolani Boulevard and Kalakaua Avenue. This shielding could also reduce noise levels at 1717 Ala Wai.

As indicated in response nos 46. and 47., the most significant traffic noise sources associated with the project are the large number of buses which will transport visitors to and from the convention center during a major convention. Management of the bus traffic for events is recommended to minimize noise impacts. Minimizing high speed idling of parked buses, the use of drive-through rather than back-up areas to limit usage of back-up alarms, and the use of lower engine RPM during acceleration are all recommended to minimize noise impacts. Similar mitigating measures for heavy trucks are also recommended.

The convention center's mechanical equipment will use sound treatment and appropriately insulated housing to comply with the DOH noise limits and minimize risks of noise impacts on neighboring properties. Within the parking garage, non-slick roadway surfaces and acoustic fire-proofing of the ceiling and structural members will attenuate parking garage noise levels.

51. We reiterate our response to no. 40 above that the CCA and the design/builder are considering enclosing the on-site truck driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The decision to enclose the truck dock driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Traffic Impact Analysis -- Appendix I

52. In response to comments received on the Draft EIS that other intersections could be affected by convention center traffic, additional analyses have since been conducted to verify that the most critical intersections have been analyzed in the EIS traffic study. The additional intersections analyzed include: Kalakaua Avenue at McCully Street, Kalakaua Avenue at Ena Road, Kalakaua Avenue at Ala Moana Boulevard, Ala Moana

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Boulevard at Ena Road/Kalia Road, Ala Wai Boulevard at McCully Street, Kapiolani Boulevard at McCully Street, Makaloa Street at Kalakaua Avenue, Hobron Lane at Ala Moana Boulevard, Atkinson Drive at Mahukona Street, and Kapiolani Boulevard at Kaheka Street/Mahukona Street. The report on these additional intersection analyses, which will be included in the Final EIS document, substantiates the selection of critical intersections initially analyzed, and indicates that the impacts on the other intersections are relatively insignificant.

You question why the traffic study disregards the regional effect of changes that affect other intersections. We note that a far better forum to address this regional analysis (and avoid duplication of efforts) is the City's Waikiki Regional Traffic Impact Plan which is the appropriate study to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). The study area limits for the City's regional study are the H-1 Freeway, Pensacola Street, Ala Moana Boulevard/Kalakaua Avenue, and Kapahulu Avenue. As discussed in meetings between the CCA and the City DTS, it was agreed that the City would incorporate the traffic data from the convention center traffic study into its regional study. Also, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

53. As indicated in response no. 52, the study area for the EIS traffic study was established based upon the intersections anticipated to be most significantly impacted by convention center traffic. Also, additional analyses were conducted of other intersections which could be affected by convention center traffic. Since it is presently undetermined as to which Waikiki hotels would be the host hotels for conventioners, the specific routes of shuttle buses, rental cars and taxis transporting conventioners from the hotels cannot be determined. Given the distribution of hotels within Waikiki, however, shuttle buses, rental cars and taxis approaching the convention center from the hotels would be dispersed among the mauka-makai streets along Ala Wai Boulevard. Most importantly, the primary intersections

where convention center-related traffic would converge from the various routes were analyzed in the EIS traffic study.

54. According to convention transportation planner S.E.A.T. Planners, Incorporated of San Diego, California, their experience with convention centers nationwide indicates that an average passenger load per shuttle bus approximating the capacity of the total number of buses required for an event is achievable. It should be noted that much pre-planning is entailed by the shuttle bus operator for a large convention to ensure timely and maximum efficiency in transporting conventioners between host hotels and the convention center. The set schedule of convention events at the convention center, along with the predetermined number of registered attendees, are the controlling factors which help to determine the number of shuttle buses required to transport conventioners. As indicated in the EIS traffic study, the largest available bus vehicle capacity provides the most cost-effective service. Based upon the current private bus fleets, the large tour coaches can accommodate a capacity of 49 or more seated passengers. The large charter coaches range in size from 49 to 65 seats, with 54 seats being the most common size. Also, the costs incurred by shuttle bus operators are attributed to labor or bus drivers, rather than the size of vehicles. Therefore, it would be more cost-effective for the shuttle bus operator to obtain maximum passenger capacity in a large-size bus, than to conduct an operation with less than the capacity number of passengers, or using smaller buses. There may be occasions, however, whereby some shuttle buses may operate at less than the seated capacity passenger loads. Likewise, other shuttle buses may accommodate standing passengers, which would result in an average load approximating the number of seats.
55. During the AM peak hour for a 14,000-person convention, the more conservative 70 percent average shuttle bus capacity would require an additional 52 bus trips. In addition to the six bus berths at the main entry drive, use of the two additional bus berths along the widened portion of Atkinson Drive would be necessary based on the lower shuttle bus capacity assumption. The two bus berths on Atkinson Drive could accommodate approximately 50 bus trips per hour. Overall, the eight bus berths

would adequately accommodate the number of shuttle bus trips in the AM peak hour based on 70 percent average capacity.

56. The lower shuttle bus capacity assumptions would not necessarily produce more realistic results. As indicated in response no. 54, experience with convention centers nationwide indicates that an average passenger load per shuttle bus approximating the capacity of the total number of buses required for an event is achievable. The contractor for the shuttle bus operations would secure a fixed number of bus vehicles for a specific event in advance of the event. Also, since the costs incurred by shuttle bus operators are attributed to labor or bus drivers, rather than the size of vehicles, it would be more cost-effective for the shuttle bus operator to obtain maximum passenger capacity than to conduct an operation with less than the seated capacity number of passengers. To compensate for the buses which may operate at less than the seated capacity passenger loads, other shuttle buses may accommodate standing passengers, which would result in an average load approximating the number of seats.
57. As indicated in response no. 52, additional analysis of the intersection of Kapiolani Boulevard at Kaheka Street/Mahukona Street was conducted in response to concerns expressed that other intersections could be affected by convention center traffic. The report on the analysis, which will be included in the Final EIS document, indicates that convention center-related traffic impacts on this intersection is relatively insignificant.
58. Convention center-related traffic is not expected to impact the intersection of Makaloa Street and Kaheka Street. During the PM peak hour, motorists will be exiting the convention center site and travelling in the opposite direction from your stated destination route.
59. As indicated in response no. 52, additional analysis of the intersection of Atkinson Drive at Mahukona Street was conducted in response to concerns expressed that other intersections could be affected by convention center traffic. The report on the analysis, which will be included in the Final EIS document, demonstrates that the

convention center traffic impacts on this intersection will be insignificant.

60. As indicated in response no. 52, additional analysis of the intersection of McCully Street at Kapiolani Boulevard was conducted in response to concerns expressed that other intersections could be affected by convention center traffic. The report on the analysis, which will be included in the Final EIS document, indicates that the convention center traffic impacts on this intersection is relatively insignificant.

We note that the traffic impact analysis of the McCully Street/Kapiolani Boulevard intersection is not based upon anticipated diversion of local resident traffic from the Kalakaua Avenue/Kapiolani Boulevard intersection as you indicate. The proposed roadway improvements, including the additional traffic lane along the project frontage of Kapiolani Boulevard and the widening/restriping of existing lanes on Kalakaua Avenue, will mitigate the convention center traffic impacts at the intersection of Kalakaua Avenue/Kapiolani Boulevard. Therefore, it is not expected that local residents will opt to travel through the McCully Street/Kapiolani Boulevard intersection to circumvent traffic conditions at the intersection of Kalakaua Avenue at Kapiolani Boulevard.

61. First, we wish to clarify the existing traffic and pedestrian signal phasing of this phase of the Kapiolani Boulevard/Keeaumoku Street intersection. During the exclusive left-turn (green arrow) phase on makaibound Keeaumoku Street onto Koko Head-bound Kapiolani Boulevard, the pedestrian crossing on Kapiolani Boulevard has a "DON'T WALK" signal. During the AM peak hour, traffic travelling to the convention center on eastbound Kapiolani Boulevard is flowing in the off-peak direction. Therefore, convention center-related traffic should not adversely impact the traffic operations at the intersection of Kapiolani Boulevard and Keeaumoku Street during the AM peak period. During the PM peak hour, the volume of traffic anticipated to exit the convention center via Kona Street (and subsequently the Keeaumoku Street/Kapiolani Boulevard intersection) is not significant. For example, during the PM peak hour for the 14,000-person convention, 55 vehicles per hour are expected to use Kona Street. The convention center

traffic using Kona Street is expected to subsequently dissipate at the entrances and exits of Ala Moana Center and at Keeaumoku Street and Piikoi Street.

62. Based on comments received on the Draft EIS, further analysis was conducted to assess the impact of convention center traffic to motorists egressing onto Kahakai Drive from the internal loop street. The capacity analysis for the intersection of Kahakai Drive and the internal loop street is analyzed as a four-legged unsignalized intersection, with the loop street and the convention center truck access legs of the intersection yielding the right-of-way (see Exhibit A). At this intersection, Kahakai Drive becomes one-way inbound from Atkinson Drive. Traffic exiting the internal loop street would yield the right-of-way to traffic bound for the convention center parking garage and truck dock area, and traffic travelling down the one-way street to the residential area. The analysis demonstrates that traffic exiting the internal loop street would operate at Level of Service (LOS) B during the AM peak hour during a 14,000-person convention event. This compares with traffic exiting the internal loop street operating at LOS A during the AM peak hour without the convention center. During the PM peak hour (14,000-person event), traffic exiting the internal loop street would operate at LOS A with and without the convention center since the inbound traffic volumes on Kahakai Drive are minimal. Both LOS A and B represent very acceptable conditions (no delay or short delays). Furthermore, traffic exiting the internal loop street would not conflict with the vehicles egressing the convention center parking garage since the Center's exit ramp is located closer to Atkinson Drive.

We wish to clarify that the intersection of the internal loop street at Kahakai Drive is currently stop-controlled (with a stop sign), and not an uncontrolled intersection as you indicate. The stop-control at this intersection will remain unchanged with the convention center.

63. As indicated in response no. 52, additional analysis of the intersection of Hobron Lane at Ala Moana Boulevard was conducted in response to concerns expressed that other intersections could be affected by convention center traffic. The report on the analysis, which will be included in the Final EIS document, indicates that the

convention center traffic impacts on this intersection is insignificant.

64. As indicated in response no. 52, additional analysis of the intersection of Ala Moana Boulevard at Ena Road/Kalia Road was conducted in response to concerns expressed that other intersections could be affected by convention center traffic. The report on the analysis, which will be included in the Final EIS document, indicates that the convention center traffic impacts on this intersection will be insignificant.

Kalakaua & Kapiolani - 10,000-Person Event

Comment (preceding no. 65.) and 65.:

First, we note that the EIS traffic study analysis shows that during the 1998 AM peak hour without the convention center project, the capacity of the intersection of Kapiolani Boulevard and Kalakaua Avenue would be exceeded (i.e., the volume-to-capacity (v/c) ratio is 1.074). Also, based on comments received on the Draft EIS, a projection of traffic conditions to the year 2005 (when the Center reaches full stabilized operating capacity) will be included in the Final EIS document. This analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City DTS and pursuant to the City's Waikiki Regional Traffic Impact Plan. While we acknowledge that traffic generated by the potential development of parcels you identified may impact the intersection of Kalakaua Avenue/Kapiolani Boulevard, we note that the developer of each project is responsible to assess the traffic impacts and provide mitigation measures to reduce the impacts accordingly.

66. Traffic turning makaibound from the curb lane on eastbound Kapiolani Boulevard onto Kalakaua Avenue would be channelized into the third (from centerline) through lane of Kalakaua Avenue (see Exhibit B). The planned channelization would encourage through traffic on Kalakaua Avenue to avoid using the fourth curb lane, and thus would not result in merging activities at the

Kalakaua Avenue bridge. Motorists travelling to the convention center would be able to enter the added fourth curb lane to access the Center's parking garage. The only vehicular merging activities would occur at the end of an event when motorists would exit the convention center garage via the Kalakaua Avenue driveway. The convention center's parking garage ramp on Kalakaua Avenue, which is reversible, would normally function as an inbound ramp. However, the ramp flow would reverse to the outbound direction when extra exiting capacity is required at the conclusion of a large event. During the PM peak hour of the 10,000-person event, 52 vehicles exiting the parking garage, plus the 10 City buses at the proposed bus stop, would utilize the fourth curb lane of Kalakaua Avenue. The combined 62 vehicles would be expected to merge one-on-one with through traffic on Kalakaua Avenue at the Ala Wai Canal Bridge.

A proposed City bus bay for the existing Route 2 Waikiki-bound buses is planned to be located within the widened portion of Kalakaua Avenue fronting the convention center site (between the Center's parking garage driveway and the Ala Wai Promenade). Buses travelling makaibound on Kalakaua Avenue would be able to enter the fourth curb lane to approach this bus stop. As indicated in the previous paragraph, the merging action of buses leaving this bus stop will be minimal due to the planned channelization from eastbound Kapiolani Boulevard onto makaibound Kalakaua Avenue. Based on projected demands, the average queue on makaibound Kalakaua Avenue may occasionally extend beyond the proposed City bus stop fronting the convention center site.

67. The EIS traffic study analysis demonstrates that the intersection of Kalakaua Avenue at Ala Wai Boulevard, which includes the Kalakaua Bridge, has sufficient capacity to accommodate both convention center and non-project traffic in year 1998. Furthermore, as indicated in response no. 65, a projection of traffic conditions to the year 2005, including the intersection of Kalakaua Avenue at Ala Wai Boulevard, will be included in the Final EIS document.

Comment (preceding no. 68.) and 68.:

Contrary to your comment, the EIS traffic study does not ignore that the mitigating additional lane on Kapiolani Boulevard and the mitigating widening of Kalakaua Avenue will create the need for four lanes to merge into three lanes. Rather, as indicated in response no. 66, traffic turning makaibound from the curb lane on eastbound Kapiolani Boulevard onto Kalakaua Avenue would be channelized into the third (from centerline) through lane of Kalakaua Avenue, and thus would not result in merging action (see Exhibit B).

69. You question the impact on the Kalakaua Bridge from the additional stress of weight and traffic. Please be apprised that bridges are designed using a theoretical "design vehicle" which represents actual operational conditions. Also, the method used in designing the bridge would be the same regardless of the traffic volumes generated by the convention center. Therefore, the adequacy of the bridge would not be affected by additional traffic volumes since its design is based on the weight of the "design vehicle".

Regarding the impact on the bridge from the additional traffic, we reiterate response no. 67 that the EIS traffic study analysis demonstrates that the intersection of Kalakaua Avenue at Ala Wai Boulevard, which includes the Kalakaua Bridge, has sufficient capacity to accommodate both convention center and non-project traffic in year 1998. Also, as previously indicated, a projection of traffic conditions to the year 2005, which will include the intersection of Kalakaua Avenue at Ala Wai Boulevard, will be included in the Final EIS document.

70. Your opinion that the required mitigating measures do not adequately compensate for the overloading of the Kalakaua Avenue/Kapiolani Boulevard intersection is not supported by the EIS traffic study. The increase in traffic attributable to the convention center is relatively small when compared with the background traffic in the vicinity. During the AM peak hour at the intersection of Kalakaua Avenue/Kapiolani Boulevard, traffic increases by 4 percent during the 10,000-person convention and by 7 percent during the 14,000-person convention. The EIS

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shows that the Kapiolani Boulevard/Kalakaua Avenue intersection would deteriorate from an existing LOS D to LOS E if the convention center were not built and only normal growth of traffic occurred in the area. Without the convention center, the proposed mitigating lane widenings would not be provided. Thus, with the increase in background traffic, the LOS would deteriorate. The lane widenings with the convention center offsets the increase in traffic associated with the convention center.

Ala Moana Boulevard & Atkinson Drive - 10,000-Person Event

Comment (preceding no. 71.) and 71.:

Contrary to your comment, although the volume-to-capacity ratio for the intersection of Ala Moana Boulevard/Atkinson Drive in year 1998 shows a significant increase both with and without the 10,000-person convention, the capacity analysis indicates that the intersection has adequate capacity under the 10,000-person convention scenario.

The EIS traffic study does identify a mitigating action for the intersection of Ala Moana Boulevard/Atkinson Drive (page 4-27). The traffic study indicates that with the large volume of vehicles turning right onto Atkinson Drive, which would be increased with the convention center, it would be desirable to add a right-turn lane along the mauka side of Ala Moana Boulevard at Atkinson Drive.

In recent discussions between the CCA and the State Department of Transportation (DOT), the DOT has indicated that they will further evaluate the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. The decision by the State DOT to implement this improvement, however, is subject to the results of the City's Waikiki Regional Traffic Impact Plan which is anticipated for completion in August 1995. The CCA will participate in ongoing discussions with the State DOT regarding the Ala Moana Boulevard/Atkinson Drive intersection.

72. First, we presume you are inquiring about the potential impact of convention center-related traffic on the

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intersection of Ala Moana Boulevard and Hobron Lane, not Atkinson Drive and Hobron Lane as indicated in your comment.

As indicated in response no. 52, additional analysis of the intersection of Ala Moana Boulevard at Hobron Lane was conducted in response to concerns expressed that other intersections could be affected by convention center traffic. The report on the analysis, which will be included in the Final EIS document, demonstrates that the convention center traffic impacts on this intersection will be insignificant.

Comment (preceding no. 73.):

Similar to response no. 71, the EIS traffic study does identify a mitigating action for anticipated traffic conditions at the intersection of Ala Moana Boulevard/Atkinson Drive (page 4-41). The traffic study indicates that it would be desirable to add a right-turn lane along the mauka side of Ala Moana Boulevard with the large volume of vehicles turning right onto Atkinson Drive, which would be increased by the convention center.

As indicated previously, in recent discussions between the CCA and the State Department of Transportation (DOT), the DOT has indicated that they will further evaluate the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. The CCA will participate in ongoing discussions with the State DOT regarding the Ala Moana Boulevard/Atkinson Drive intersection.

73. and Comment (following no. 73.):

As previously indicated, the developer(s) of any potential or future development in the vicinity of the convention center site (including the Hobron area) is responsible to assess the traffic impacts of his/her project and provide mitigation measures to reduce the impacts accordingly.

74. You question the impact on the private property value and tax base to the City if future development must be limited in the area due to traffic jams created by the convention center. Contrary to your perception, the EIS

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traffic study demonstrates that the convention center will mitigate its traffic impacts to conditions comparable to that of a no-project scenario. Without the convention center, the proposed lane widenings along Kalakaua Avenue, Kapiolani Boulevard, Atkinson Drive, and Kahakai Drive would not be provided. As such, with the increase in background traffic, the levels-of-service in the study area intersections would deteriorate. The lane widenings with the convention center offset the increase in traffic associated with the convention center.

We recognize, however, that the convention center is impacting an area that has significant volumes of existing traffic and that, even if the Center were not built, traffic will continue to increase. As previously indicated, the City DTS is examining this traffic situation in a more comprehensive manner through its Waikiki Regional Traffic Impact Plan. While this study is not intended to assess the impacts of the convention center, it takes into account convention center traffic, based on the EIS traffic study.

75. In the analysis of the 3,000-person event on a Friday evening post-commuter peak hour, the intersections at the "gateways to Waikiki", including Kalakaua Avenue at Kapiolani Boulevard and Ala Moana Boulevard at Atkinson Drive, were analyzed since they were anticipated to be most significantly impacted by convention center traffic. Furthermore, the City DTS weekend traffic counts on makaibound Kalakaua Avenue, between Kapiolani Boulevard and Ala Wai Boulevard, show a decline during the PM post-commuter peak period.

There are other factors considered in determining that convention center traffic is not expected to impact the Ala Wai Boulevard/Kalakaua Avenue intersection during a 3,000-person Friday evening post-commuter event. First, vehicles bound for the convention center from Waikiki will be directed to travel via westbound Ala Moana Boulevard due to the left-turn restriction at Kalakaua Avenue onto Kapiolani Boulevard during the PM peak traffic period. Secondly, at the end of the evening event, vehicles leaving the convention center and returning to Waikiki via Kalakaua Avenue are not anticipated to impact the Ala Wai Boulevard/Kalakaua Avenue intersection due to the late evening period. For

example, based on traffic counts conducted for the EIS traffic study at four key intersections in the vicinity of the convention center site (including Kapiolani Boulevard/Kalakaua Avenue and Kapiolani Boulevard/Atkinson Drive) on a Friday evening between 6:30 PM and 11:00 PM, it was determined that the Friday evening peak traffic hour typically occurs between 6:30 PM and 7:30 PM.

Comment (preceding no. 76.) and 76.:

The location of the temporary regulatory signs on westbound Ala Moana Boulevard notifying motorists of the designation of the curb lane to a right-turn only lane onto Atkinson Drive, will be in accordance with the appropriate State DOT standards. For motorists on the curb lane of Ala Moana Boulevard not intending to turn right onto Atkinson Drive, the changing of lanes to the adjacent through lane would occur between the first regulatory sign in the westbound direction on Ala Moana Boulevard and prior to the coning near Atkinson Drive.

77. The number and location of temporary regulatory signs notifying motorists of the designation of the curb lane of Ala Moana Boulevard to a right-turn only lane onto Atkinson Drive, would be positioned well in advance of the intersection to mitigate the effects of potential lane changing.

78. As previously indicated in response nos. 76 and 77, the location of temporary regulatory signs on westbound Ala Moana Boulevard, in advance of Atkinson Drive, will be in accordance with State DOT standards.

During operation of the convention center, the operator of the Center will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. A transportation management plan, which includes temporary coning and signing operations, temporary on-street parking restrictions, and responsibilities of traffic control personnel, will be prepared prior to the opening of the convention center by the Center's transportation coordinator and reviewed by the City DTS and, as deemed appropriate, by the State DOT. The transportation coordinator will be responsible

for obtaining the appropriate permits from the City DTS and the State DOT for the installation of temporary traffic control signs and coning, and for the physical placement and removal of the signs and cones.

79. The specifications of the temporary regulatory signs (i.e., size, color, reflective surface, message, and symbols) will be prepared in accordance with the appropriate State DOT standards.
80. Since the primary intent of the temporary regulatory signs is to notify motorists of the designation of the curb lane of westbound Ala Moana Boulevard to a right-turn only lane onto Atkinson Drive, the visibility of the signs would be of more importance than its aesthetic appearance. Also, as indicated in response no. 79, the specifications of the signs will be in accordance with the appropriate State DOT standards. Furthermore, the signs will be installed only on a temporary basis during national convention-related evening events, as deemed necessary.
81. For the Ala Moana Boulevard/Atkinson Drive intersection, the levels-of-service indicated in Table 4-12 (Draft EIS traffic study) refer to the overall intersection level-of-service. On the other hand, the discussion on pages 4-52 and 4-53 (section d.) refers to the levels-of-service of the individual traffic movements within the intersection.

Comment (following no. 81.):

We wish to clarify that the recommended mitigation measure for this intersection (during the 3,000-person Friday evening post-commuter event) does not include the use of "informational signs". Rather, the mitigation recommends the installation of temporary regulatory signs and coning of the curb lane of westbound Ala Moana Boulevard between the Ala Wai Canal Bridge and Atkinson Drive.

All-Local Event

First and Second Comments (preceding no. 82.) and 82.:

The recommended westbound contra-flow coning operation on Kapiolani Boulevard would be implemented immediately after the end of the City's PM peak period eastbound contra-flow coning operation. The convention center's transportation coordinator will coordinate the implementation of the westbound contra-flow operation with the City DTS to avoid any potential conflict with the eastbound contra-flow operation.

83. The recommended westbound contra-flow coning operation on Kapiolani Boulevard will not overlap with the City's PM peak period eastbound contra-flow coning operation. As indicated in response no. 82, the westbound contra-flow operation would occur immediately following the end of the City's eastbound contra-flow operation.
84. The coning trucks associated with both the recommended westbound contra-flow operation and the City's eastbound contra-flow operation will not impact the PM peak period traffic. The end of the City's eastbound contra-flow operation and the start of the recommended westbound coning operation both occur after the PM peak period traffic.

Comment (preceding no. 85.) and 85.:

During a Friday evening post-commuter event, it is expected that convention center-bound traffic will use the makai-most left-turn lane from Kapiolani Boulevard onto Atkinson Drive to turn left at Kahakai Drive. Traffic not bound for the convention center is expected to use the second shared through/left-turn lane on Kapiolani Boulevard to turn onto makaibound Atkinson Drive. Therefore, there is not expected to be merging activities which would subsequently affect queuing at the Kapiolani Boulevard/Atkinson Drive intersection. Furthermore, the signal coordination between the proposed traffic signal at the intersection of Atkinson Drive/Kahakai Drive and the existing traffic signal at the Kapiolani Boulevard/Atkinson Drive intersection is required to minimize queuing on Atkinson Drive between Kahakai Drive and Kapiolani Boulevard.

DEIS:

- We wish to clarify your comment which inaccurately implies that mitigation calls for informational signs directing motorists to by-pass the Atkinson Drive intersection and continue on to the Kalakaua Avenue parking garage entrance to the convention center. According to the EIS traffic study for the Friday evening post-commuter 1,800-person all-local event impact analysis, it is recommended that informational signs be placed on makaibound Kalakaua Avenue to direct convention center traffic to the Kalakaua Avenue parking garage entrance. In addition, informational signs are also recommended to be placed on eastbound Kapiolani Boulevard to direct convention center traffic to the Kahakai Drive parking garage entrance, as well as to the parking garage entrance at Kalakaua Avenue.
86. The specifications of the informational signs (i.e., size, color, reflective surface, message, and symbols) will be prepared in accordance with the appropriate City DTS standards. The location of the informational signs will be coordinated between the convention center operator and the City DTS.
 87. The informational signs will not impact the intersections of Kaheka Street/Kapiolani Boulevard and Mahukona Street/Atkinson Drive. The signs are intended to notify motorists of alternative parking garage access locations and will be located along the approaches to, and well in advance of, the convention center.
 88. The decision on whether these informational signs will be temporary or permanent will be determined by the City DTS during the design review phase of the project.
 89. The coordination of the traffic signals along Kapiolani Boulevard will not be affected by the proposed traffic signal at the intersection of Atkinson Drive/Kahakai Drive. The timing of the proposed traffic signal at the Atkinson Drive/Kahakai Drive intersection will be adjusted to the Kapiolani Boulevard/Atkinson Drive intersection traffic signal coordination.
 90. The coordination of the proposed traffic signal at the Atkinson Drive/Kahakai Drive intersection is not expected to affect all major intersections in the "loop" (i.e.,

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Kapiolani Boulevard, Kalakaua Avenue, Ala Moana Boulevard, and Atkinson Drive). In general, traffic signal coordination usually occurs along arterial roadways, such as Ala Moana Boulevard and Kapiolani Boulevard. The traffic signal timing for the intersection of Atkinson Drive/Kahakai Drive will be adjusted to the Kapiolani Boulevard traffic signal coordination at Atkinson Drive.

Comment (following no. 90.):

Your comment indicating that no mitigating actions and solutions are included or evident in the project for the intersection of Ala Moana Boulevard at Atkinson Drive is inaccurate. As indicated in response nos. 71 and 73 above, the EIS traffic study does identify a mitigating action for anticipated traffic conditions during the 10,000-person and 14,000-person events at the intersection of Ala Moana Boulevard/Atkinson Drive. The traffic study indicates that it would be desirable to add a right-turn lane along the mauka side of Ala Moana Boulevard with the large volume of vehicles turning right onto Atkinson Drive, which would be increased by the convention center. We reiterate our previous response that in recent discussions between the CCA and the State DOT, the DOT has indicated that they will further evaluate the right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. The CCA will participate in ongoing discussions with the State DOT regarding the Ala Moana Boulevard/Atkinson Drive intersection.

For the 3,000-person Friday evening post-commuter event, the recommended mitigation of designating the curb lane on westbound Ala Moana Boulevard to a right-turn only movement onto Atkinson Drive is recommended to improve traffic operations at the intersection. This mitigation would include signing and coning the curb lane of Ala Moana Boulevard between the Ala Wai Canal Bridge and Atkinson Drive to a right-turn movement only. (This mitigation would not be necessary if the DOT installs a right-turn lane in this location, as previously discussed.) For the all-local 1,800-person Friday evening post-commuter event, no mitigation is recommended as the intersection is not expected to be significantly impacted.

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Regarding the second paragraph of your comment, we inform you that a portion is unreadable as the beginning of the second sentence overlaps the ending of the first sentence. As such, our response is based on what we were able to interpret within the overall context of this comment.

Your comment implies that the consumption of the surrounding intersections, coupled with imminent redevelopment of the area around the convention center, forecast major problems that are not being considered. You further indicate that restrictions have to be imposed in the immediate area in order to prevent the "strangulation" of Waikiki and the convention center area. First, we note that the purpose of the EIS traffic study is to identify potential traffic and transportation-related impacts resulting from the convention center and to identify appropriate mitigation measures. On the other hand, the City's Waikiki Regional Traffic Impact Plan is intended to analyze traffic impacts of existing and future conditions in the region to year 2005, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). The Waikiki Regional Traffic Impact Plan is anticipated to be completed by August 1995. The CCA has participated in a number of meetings with the City DTS regarding the two studies, wherein it was agreed that the City would incorporate the traffic data from the convention center's traffic study into its regional study. Also, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member. Furthermore, we reiterate our earlier response that the developer(s) of any potential or future development in the vicinity of the convention center site is responsible to assess the traffic impacts of his/her project and provide mitigation measures to reduce the impacts accordingly.

Parking

91. The EIS traffic study identifies a number of parking alternatives which could become part of an overall transportation management plan by the convention center's transportation coordinator. It is acknowledged that

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there may be events that would have a higher proportion of local residents driving to the convention center, or would require additional temporary and part-time employees, or trade show exhibitors who may require special parking needs. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include use of existing outlying parking facilities that may be available during the event; arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking; and, issuance of public bus passes to convention center employees.

Comment (preceding no. 92.) and 92.:

The EIS traffic study indicates that parking on both sides of Kapiolani Boulevard between Atkinson Drive and Kaheka Street (approximately 40 stalls) may be restricted during the Friday evening post-commuter peak period to accommodate traffic flow for a large evening event at the Center. As deemed necessary, the existing PM peak period parking restriction would be extended through the proposed westbound contra-flow coning operation on Kapiolani Boulevard, and lifted shortly thereafter. With respect to notification of temporary restriction of on-street parking, such restrictions will be clearly indicated on signs which will be installed in advance of the respective events. The on-street parking restrictions will result in temporary inconvenience to area residents and businesses.

Truck and Shuttle Bus Activity

DEIS: Until such time that an operator for the Hawai'i Convention Center is designated, the specific times for truck arrivals and departures associated with convention operations cannot be determined. The convention center's transportation coordinator would be responsible for scheduling the arrival of trucks. The scheduling should minimize the number of truck arriving and departing during the morning and afternoon peak traffic periods.

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93. Heavy delivery trucks travelling to and from the convention center will need to comply with the State DOH vehicular noise limits and curfew periods. At this time, the operating hours of the Hawai'i Convention Center facility are undetermined and will be established by the operator of the Center. According to the CCA, convention centers typically do not have set hours of operation. Aside from the administration hours, operating hours would primarily be dependent on the number and types of events or functions held at the convention center. However, 24-hour security will be provided at the convention center facility. As indicated in the prior response, the specific times for truck arrivals and departures associated with convention operations cannot be determined at this time.
94. As indicated in response no. 93, the operating hours of the Hawai'i Convention Center facility are undetermined at this time and will be established by the operator of the Center. However, as previously indicated, 24-hour security will be provided at the convention center facility.
95. According to the CCA, the set-up and take-down activities at convention centers do not occur 24 hours a day. As previously indicated, heavy delivery trucks travelling to and from the convention center will need to comply with the State DOH vehicular noise limits and curfew periods.

First and Second Comments (preceding no. 96.):

We would like to clarify that the 30-second headway is the "average" time between the arrival of successive shuttle buses.

You indicate that the shuttle bus calculation reflects the unlikely factor of 100 percent capacity and efficiency, and that a more realistic figure for capacity and efficiency would yield a significantly higher number of bus trips. As you raised these concerns earlier in your letter, we reiterate our response nos. 54, 55, and 56 above.

96., Comment (following no. 96.), and 97.:

In general, your comments reflect concern with the potential merging impact of shuttle buses leaving the convention center's main entry drive area with traffic on Kapiolani Boulevard, and its affect on the Kalakaua Avenue/Kapiolani Boulevard intersection. The EIS traffic study indicates that the volume of vehicular traffic exiting the lobby entry drive (shuttle buses, taxis and passenger vehicles) is greatest during the AM peak hour (308 vehicles during a 14,000-person convention) when the volume of eastbound traffic on Kapiolani Boulevard is relatively low. With these conditions, queuing as a result of merging activities is not expected to occur. During the PM peak hour, the volume of vehicular traffic exiting the lobby entry drive is anticipated to be less than half of that exiting during the AM peak hour (152 vehicles). The proposed lane widening on Kapiolani Boulevard increases the eastbound capacity between Atkinson Drive and Kalakaua Avenue from four (there is already one additional lane due to PM coning) lanes to five lanes. Also, motorists on eastbound Kapiolani Boulevard would be able to turn makaibound onto Kalakaua Avenue from the third lane (optional through/right-turn lane).

Furthermore, the traffic study's loading analysis of shuttle buses exiting the lobby entry drive area during the PM peak hour reflects the additional delay resulting from the potential merging/queuing actions of traffic on eastbound Kapiolani Boulevard. The shuttle bus loading analysis accounts for the heavy traffic conditions on eastbound Kapiolani Boulevard, such as traffic queuing from the Kalakaua Avenue intersection to the main entry driveway during the PM peak hour. The shuttle bus departures would be directly affected by the traffic signal at the intersection of Kapiolani Boulevard at Kalakaua Avenue. The shuttle buses would primarily depart the main entry drive area and merge into the curb lane of eastbound Kapiolani Boulevard during the green phase at the intersection. The delay in shuttle bus departures would affect the dwell times. The shuttle bus berth analysis for the PM peak hour reflects the effect of the queues at the Kapiolani Boulevard/Kalakaua Avenue intersection on shuttle bus dwell times. Under congested conditions when the curb lane of Kapiolani Boulevard

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queues back to the lobby exit driveway, shuttle buses and taxis are expected to merge one-on-one into Kapiolani Boulevard traffic. During the AM peak hour, the relatively low traffic demand on eastbound Kapiolani Boulevard is not expected to significantly delay the exiting of vehicles from the main entry driveway.

The convention center's exit driveway on Kapiolani Boulevard will be controlled by either a yield or stop sign. The method of driveway traffic control will be determined by the City DTS during the project's design review phase.

98. You question how the merging action of shuttle buses from the "mitigating" lane on Kalakaua Avenue near the bridge (over the Ala Wai Canal) with traffic on Kalakaua Avenue would affect the results of the traffic study had it been evaluated. As you raised this merging concern earlier in your letter, we reiterate that traffic (including shuttle buses) turning makaibound from the curb lane on eastbound Kapiolani Boulevard onto Kalakaua Avenue would be channelized into the third (from centerline) through lane of Kalakaua Avenue (see Exhibit B). The planned channelization would encourage through traffic on Kalakaua Avenue to avoid using the added fourth curb lane, and thus would not result in merging activities at the Kalakaua Avenue bridge.

Pedestrian Access Around the Site

Comment (preceding no. 99.):

Contrary to your comment, as indicated in the EIS traffic study, the relocation of the utility poles at each end of the Kalakaua Bridge results in LOS D, which is adequate based upon the more conservative 35 percent walk mode assumption for the convention center. The utility poles will be relocated in conjunction with the convention center project. We note that the analysis of pedestrian access conducted for the traffic study is to determine the potential impacts and mitigation measures, if any, attributed to the convention center. It is not the intent of, nor is it feasible for, the pedestrian impact analysis to consider pedestrian conditions attributed to the future development of surrounding properties.

99. Although not required, the three options to further improving pedestrian access as mentioned in the EIS traffic study (widening the existing Kalakaua Bridge; constructing a new pedestrian-only bridge paralleling the Kalakaua Bridge; and constructing a new pedestrian bridge near Lipeepee Street) were included in the study to identify potential means to further improve pedestrian access in the vicinity. However, these options are not intended to be mitigation for the convention center project nor a commitment to build them. We acknowledge that the Kalakaua Bridge is listed on the State Department of Transportation bridge survey in the DOT 1 category, indicating that it is a significant site and is to be preserved.
100. Based on the analysis of pedestrian access in the EIS traffic study, construction of a pedestrian bridge across the Ala Wai Canal is not required to mitigate anticipated convention center pedestrian impacts. However, a future pedestrian bridge at Lipeepee Street could provide better access to the convention center for walkers. Such a bridge would be pursued as a separate action and be subject to the historic sites review process and the provisions of Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) because it would affect historic properties, be built on public lands, and likely involve public funds. Potential impacts of the bridge on the residential communities on both sides of the Canal would be addressed in the EIS for the project. Your comment that the sidewalks on the Diamond Head side of the Canal are inadequate to accommodate the number of pedestrians who would walk through the neighborhood to the pedestrian bridge is acknowledged.
101. Although there has been discussion in recent years concerning a potential pedestrian bridge over the Ala Wai Canal near Lipeepee Street, more detailed plans, including the developer and funding source, remain undetermined. As indicated in response no. 100, development of the bridge would be subject to the Hawaii EIS law, wherein potential impacts of the bridge on the adjacent communities would be addressed.
102. The City's Waikiki Master Plan calls for a pedestrian bridge to be provided on the ewa side of the Ala Wai Canal at Lipeepee Street. The Plan depicts that the ewa

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section of the Ala Wai Canal would be enhanced as part of the Waikiki Promenade, and envisions that Ala Wai Boulevard, from the Ala Moana Boulevard Bridge to Lipeepee Street, would be closed. The right-of-way would be landscaped as a pedestrian Promenade parallel to the Canal. Again, we reiterate that the EIS traffic study does not indicate that a pedestrian bridge across the Ala Wai Canal is necessary to mitigate the additional flow of pedestrian traffic generated by the convention center operations.

103. and 104.:

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead, landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock, and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive by the Atkinson Plaza condominium (not in front of the convention center lobby as you indicate), and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation

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Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Serious Design-Related Problems

Impeded Vehicle Access to Kahakai Drive

First and Second Comments (preceding no. 105.), 105., and Comment (following no. 105):

On-street parking on the makai side of Kahakai Drive (5 stalls) would be restricted during large convention events to provide for two inbound lanes for both convention center-goers and area residents. As required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic and emergency vehicles during convention events. During periods when such on-street parking is allowed (i.e., when large conventions are not being held), access for both residential and emergency vehicles on Kahakai Drive would be no different from current conditions.

106. and 107.:

In relation to the convention center, there are no plans, nor is it deemed necessary, to reroute emergency vehicles to Waikiki during peak convention center traffic. Also, in the event of an emergency, emergency vehicles will not be denied access due to convention center traffic.

Regarding emergency vehicle access due to convention center traffic, please be apprised that among the most important project mitigation measure is the provision of an additional lane of traffic along Kalakaua Avenue and Kapiolani Boulevard, an additional lane along Kahakai Drive, and two (2) additional traffic lanes along Kahakai Drive to accommodate convention center traffic. All of these road widenings will be on the convention center property and, in combination, are anticipated to offset the impacts of traffic created by the convention center during peak traffic hours. Also, as required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic

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and emergency vehicles during large convention center events.

Furthermore, streets in the area of the convention center have sufficient road width for emergency vehicles to pass traffic pulled over to the curb side. Although it would be rare, any rerouting of emergency vehicles to get into Waikiki will be at the discretion of the respective driver.

Comment (preceding no. 108.):

Recognizing the limited number of on-street parking spaces in the area, the Convention Center Authority's proposal to restrict the five on-street parking spaces on an event-related basis, rather than permanently eliminating them, is intended to minimize the loss of on-street parking. However, if the majority of the area residents favor eliminating these five spaces, they may consider submitting a petition to the City Department of Transportation Services requesting a permanent ban of this on-street parking.

108. Development of the convention center and its associated roadway improvements will require elimination of five on-street parking stalls on the ewa side of Atkinson Drive between Kapiolani Boulevard and Kona Street. In addition, the five on-street stalls on the makai side of Kahakai Drive may be restricted during large convention events. This will be a negative impact in that on-street parking in the immediate area of the convention center site is already at a premium. Also, many of the older residential buildings in the Kahakai Drive area do not have adequate parking facilities, and do not provide stalls for visitors. A discussion on the impacts resulting from the loss of on-street parking stalls will be included in the social impact assessment and the Final EIS document.

Vehicle Egress Severely Impeded from Kahakai Drive T-Intersection

Comment (preceding no. 109.) and 109.:

You express concern regarding the potential queuing of vehicles on Kahakai Drive preventing easy vehicular

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egress from the Kahakai Drive internal loop. You also inquire how the uncontrolled T-intersection on Kahakai Drive will be improved to allow residents to freely egress. As you raised this concern earlier in your letter, we reiterate our response no. 62 above. Also, as previously indicated, the convention center's transportation management plan could include the stationing of traffic control personnel at key intersections or access points to facilitate the movement of traffic during large convention events.

Furthermore, we wish to clarify that motorists turning left onto Kahakai Drive from the internal loop street would actually be crossing up to two inbound lanes, not four lanes as you indicate (see Exhibit A). Further, during periods in which parking is allowed on the makai side of Kahakai Drive, traffic egressing the internal loop street would cross only one inbound lane on Kahakai Drive, a situation which presently exists. Also, we reiterate that the intersection of the internal loop street at Kahakai Drive is currently stop-controlled (with a stop sign), and not an uncontrolled intersection as you indicate. The stop-control at this intersection will remain unchanged with the convention center.

Comment (preceding no. 110.):

You indicate that even if there was a full-time traffic director at the intersection of Kahakai Drive and the internal loop street, his priority would be to move vehicles out of the convention center. First, the decision to station traffic control personnel at key access points near the convention center would be on an event-related basis (i.e., for the largest events, if deemed necessary). Secondly, the traffic control personnel would be responsible to direct the movement of all vehicles which pass through the particular intersection or access point.

110. Based on the traffic analysis conducted for the T-intersection of Kahakai Drive and the internal loop street during a 14,000-person event, it is expected that the intersection will operate efficiently on its own. As previously indicated, if deemed necessary on an event-related basis, traffic control personnel would be stationed at the designated area to direct the movement

of all vehicles which pass through the intersection or access point. It is in the best interest of the convention center operator to ensure efficient traffic operations for both the Center and its relationship with adjacent neighbors.

111. The intersection of Kahakai Drive and the internal loop street, along with the convention center facility, is comparable to a four-legged unsignalized intersection, with the loop street and the convention center truck access legs of the intersection yielding the right-of-way (see Exhibit A). Traffic exiting the internal loop street would yield the right-of-way to traffic bound for the convention center parking garage and truck dock area, and traffic travelling down the one-way street to the residential area.

112. The intersection of the internal loop street at Kahakai Drive is currently stop-controlled (with a stop sign) and will remain unchanged with the convention center. We reiterate that although the convention center and inbound residential traffic will have the right-of-way over vehicles egressing the internal loop street, the analysis demonstrates that traffic exiting the loop street would operate at LOS B during the AM peak hour during a 14,000-person convention event (compared to LOS A without the convention center). During the PM peak hour (14,000-person convention event), traffic exiting the loop street would operate at LOS A with and without the convention center. As previously indicated, both LOS A and B represent very acceptable conditions (no delay or short delays).

As previously indicated, if deemed necessary on an event-related basis, traffic control personnel would be stationed at the designated area to direct the movement of all vehicles which pass through the intersection or access point.

Comment (following no. 112.):

We acknowledge your comment indicating that most of the small residential low-rise buildings in the Kahakai Drive area have been consolidated and will probably be replaced with more vehicle intensive uses in the near future. However, we note that the developer(s) of any

redevelopment project is responsible for assessing the traffic impacts and providing mitigation measures to reduce the impacts accordingly.

Truck Ingress and Egress from Convention Center Loading Bays and Service Areas

Comment (preceding no. 113.) and 113.:

As previously indicated in response no. 41, due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Comment (preceding no. 114.) and 114.:

At 10 heavy truck trips per hour, it is possible for heavy trucks to comply with the State DOH vehicular noise standards, provided each truck noise event does not exceed approximately 36 seconds. The 60 and 50 dBA DOH noise limits are generally not applied to motor vehicles.

115. The decision to enclose the on-site truck dock driveway will be made prior to the start of construction of the convention center facility.
116. In response to concerns raised by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, design alternatives/modifications have been made to the portion of the convention center facility along Kahakai Drive and The Summer Palace. As previously indicated, the design/build team has prepared an alternate design that would replace the landscaping in front of the convention center's circular parking ramp

structures with a sidewalk. The decision on which plan will be implemented will be made by the City DTS.

Also, the decision to enclose the on-site truck dock driveway will be made in consultation with the residents of The Summer Palace condominium.

Furthermore, as part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may otherwise be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace. We note that the elevation of the convention center's parking garage is approximately 14 feet higher than the pool and recreation deck of The Summer Palace condominium.

117. Please be apprised that the convention center's truck loading dock is fully enclosed along the Ala Wai Promenade. Also, we reiterate that the decision to enclose the on-site truck dock driveway will be made in consultation with The Summer Palace condominium residents.

118. The convention center facility is a design/build project and, as such, we do not anticipate any cost overruns.

119. It is not anticipated that the convention center project will be affected by insufficient budget allowances, resulting in compromised design. We note that \$200 million is budgeted for the design and construction of the convention center facility.

120. It is not expected that the convention center will significantly increase the potential of crime in the immediate area, nor is a change in the nature of crime (increased drug activities or prostitution) anticipated to occur. According to the convention center manager of The BC Pavilion Corporation in Vancouver, British Columbia, convention centers, such as those in Los Angeles, New Orleans, Seattle, New York, and San Diego,

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have tended to revitalize the neighboring community and increased public safety. Although the prospect of a large number of people coming to a facility may result in increased opportunities for crime, the proposed plan to bus the majority of visiting conventioners to the Hawai'i Convention Center facility will be a controlling factor for the potential of increased crime. Furthermore, it is noted that convention centers tend to attract more of the professionals, and Hawaii conventions attract more families, whereas activities such as prostitution tend to be more evident with other tourists. Also, the Hawai'i Convention Center facility is equipped to provide 24-hour security.

Impacts to Public Park and Recreation Facilities

DEIS:

Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division, the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including planters, in the Ala Wai Canal Promenade. A plan to relocate up to five banyan trees within the Promenade, directly adjacent to the bottom of the stairway, has been withdrawn following denial of the request to the City's Exceptional Tree Committee. No banyan trees within the Promenade will be relocated or removed.

121. The Ala Wai Promenade has been determined to be eligible for listing on the National Register of Historic Places (NRHP) and is regarded as a "historic property" (Section 800.2, 36 Code of Federal Regulations Part 800: Protection of Historic Properties). Therefore, any "activity" that is "licensed... by a Federal agency" and "can result in changes in the character or use of historic properties" is subject to review under Section 106 of the National Historic Preservation Act of 1966 (Section 800.2 36 CFR 800). For the convention center project, it appears that the "triggering" Federal license is the National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges from the site during construction.

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The Section 106 Review process involves a determination of "effect" or "adverse effect" by the State Historic Preservation Division (SHPD). If an "effect" or "adverse effect" is determined, then the National Advisory Council on Historic Preservation is consulted before the permit can be issued. The design/builder has been consulting with the SHPD to determine if the impacts of the convention center on the Ala Wai Promenade can be avoided or mitigated such that a finding of "no effect" can be issued. Such a finding by the Historic Preservation Division would terminate the Section 106 review process.

For the purpose of determining effect, "alteration to features of the property's location, setting or use may be relevant depending on the property's significant characteristics and should be considered" (Section 800.9 36 CFR 800). The SHPD identified three areas of potential effect: the relocation of trees within the Promenade; construction of walkways, landscaping, and installation of lighting and street furniture in the Promenade; and, the visual impact of the convention center walls on the Promenade.

The SHPD indicated that their finding of no effect with respect to the relocation of trees within the Promenade will be consistent with whatever decision the City's Exceptional Tree Committee reaches to allow or disallow any tree relocation. A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

Any construction of walkways, lighting, landscaping and street furniture in the Promenade will comply with the SHPD's determination of what it will consider as having "no effect." In general, the SHPD has indicated that pedestrian use of the Promenade is consistent with its historic character and that walkways and other improvements to promote such use would also be appropriate to some degree. Their determination of effect is being considered in regard to specifics such as the width of the walkways, finishes, type of lighting, etc.

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The walls enclosing the Loading Dock of the convention center on either side of the grand stairway will rise approximately 20-foot high within a few feet inside the convention center property. While there will be no encroachment within the Promenade, the visual impact of the walls could be considered an effect on the historic character of the Promenade. The design/builder is discussing options for softening the visual impact of the walls with the SHPD, including measures such as growing vines covering the wall. The SHPD is taking into account the urban setting of the Promenade and the existing development that presently abuts it.

Comment (preceding no. 122.):

In the revised design, no coconut trees will be located beyond the convention center boundary.

122. The Section 106 Review process is intended to protect historic resources from actions that could adversely affect its historic character. As mentioned previously, the design/builder has been consulting with the SHPD to determine if the impacts of the convention center on the Ala Wai Promenade can be avoided or mitigated such that a finding of "no effect" can be issued.

123. The project design has been modified as discussed previously.

Comment (preceding no. 124.):

We acknowledge your comment. The project design has been modified as discussed previously.

124. While some loss in space allocations or various functions would result from the modified design, all of the basic facility requirements in the Request for Proposal will be met within the convention center property and the overall integrity of the Center's design and function will be preserved.

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125. Same response as above.

Comment (preceding no. 126.):

We were unable to locate your reference to our use of the term "improvement along the project frontage" in relation to the Ala Wai Promenade in the Draft EIS.

126. As discussed previously, the design/build team is discussing with the SHPD what pedestrian-oriented improvements in the Ala Wai Promenade will have no effect on the historic character of the Promenade.

127. To the contrary, the intent of both the previous and revised design was to extend the use of the Promenade onto the convention center.

128. At this time it is envisioned that the first terrace and the stairways leading to it will be open to the public at all times.

129. Same response as above.

Comment (preceding no. 130.):

The discussion of impacts on the Ala Wai Promenade have been expanded upon in the final EIS based on comments received on the Draft EIS. As discussed below, the details of plans for improvements in the Ala Wai Promenade are unresolved. Although the plans have been modified as described previously, they are no more "complete" in the Final EIS as they were in the Draft EIS.

130. There is no encroachment in the revised plan.

131. Same response as above.

132. This will be determined in consultation with the SHPD.

133. This option was one being discussed with the SHPD. The City's arborist will also review all plans for improvements in the Ala Wai Promenade with respect to protecting the Banyan trees.

134. This is an issue that the City arborist will address with respect to approval of any work in the Promenade that could affect the Banyan trees.
135. The design/builder has requested a permit from the City Department of Parks and Recreation pursuant to Section 41-13.8, Revised Ordinances of Honolulu, to conduct excavation that will remove a portion of the root systems and to prune the Banyan trees in the Ala Wai Promenade which are adjacent to the convention center boundary. On-going consultation with the City's certified arborist has been pursued to formulate a plan to minimize adverse impacts to the trees. The plan includes procedures such as for trimming the roots, installing a root barrier, irrigation and monitoring. Procedures and requirements will also be imposed on tree pruning. The design/builder will install an 8-foot high fence along the boundary between the convention center and the Promenade to keep construction activities out of the Promenade.
136. As discussed above, the convention center design has been modified. Moreover, the design of the walkway and other improvements within the Promenade is unresolved at this time.
137. The Final EIS will be available for public review in the same public venues as the Draft EIS, e.g., the various public libraries and the legislature's public access room. Future decisions regarding tree relocation and specific designs of Promenade improvements will be documented and become public record. Such documents will be available for review at the CCA and SHPD.
138. The Promenade is under the jurisdiction of the City's Department of Parks and Recreation which may pursue further improvements. It is also conceivable that the CCA could participate in other independent projects to improve the Promenade. Any project on the Promenade would require compliance with environmental impact documentation requirements of Chapter 343, Hawaii Revised Statutes (HRS), Chapter 6E, HRS pertaining to historic preservation, and Section 106 of the National Historic Preservation Act.
139. It is our understanding that the City will not be simultaneously be improving the Promenade.

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140. The design/builder has participated in discussions with the City toward coordinating plans, however, the SHPD indicates that the City's plans would have an effect on the historic character of the Promenade, a determination the design/builder wishes to avoid. If no consensus with the City can be achieved, the design/builder may, with the concurrence of the SHPD that it would have no effect on the historic character of the Promenade, install temporary walkway improvements which can be replaced at a later date to match the City's plans, when they are approved through the Section 106 Review process.

141. The State has not made such a commitment at this time.

142. Only the improvements by the design/builder which the SHPD can determine to have no effect on the historic character of the Promenade will be completed.

Comment (preceding no. 143.):

There is no encroachment in the revised plan.

143. The facility requirements in the Request for Proposal were formulated after the site was purchased. The withdrawal of the stairs from the Promenade was accomplished while meeting all of the basic facility requirements in the Request for Proposal and preserving the overall integrity of the Center's design and function. Although some space allocations were compromised, such compromises are common to almost any architectural design process.

144. This was accomplished.

145. The encroachment in the Promenade was in the design/builder's original proposal.

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Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

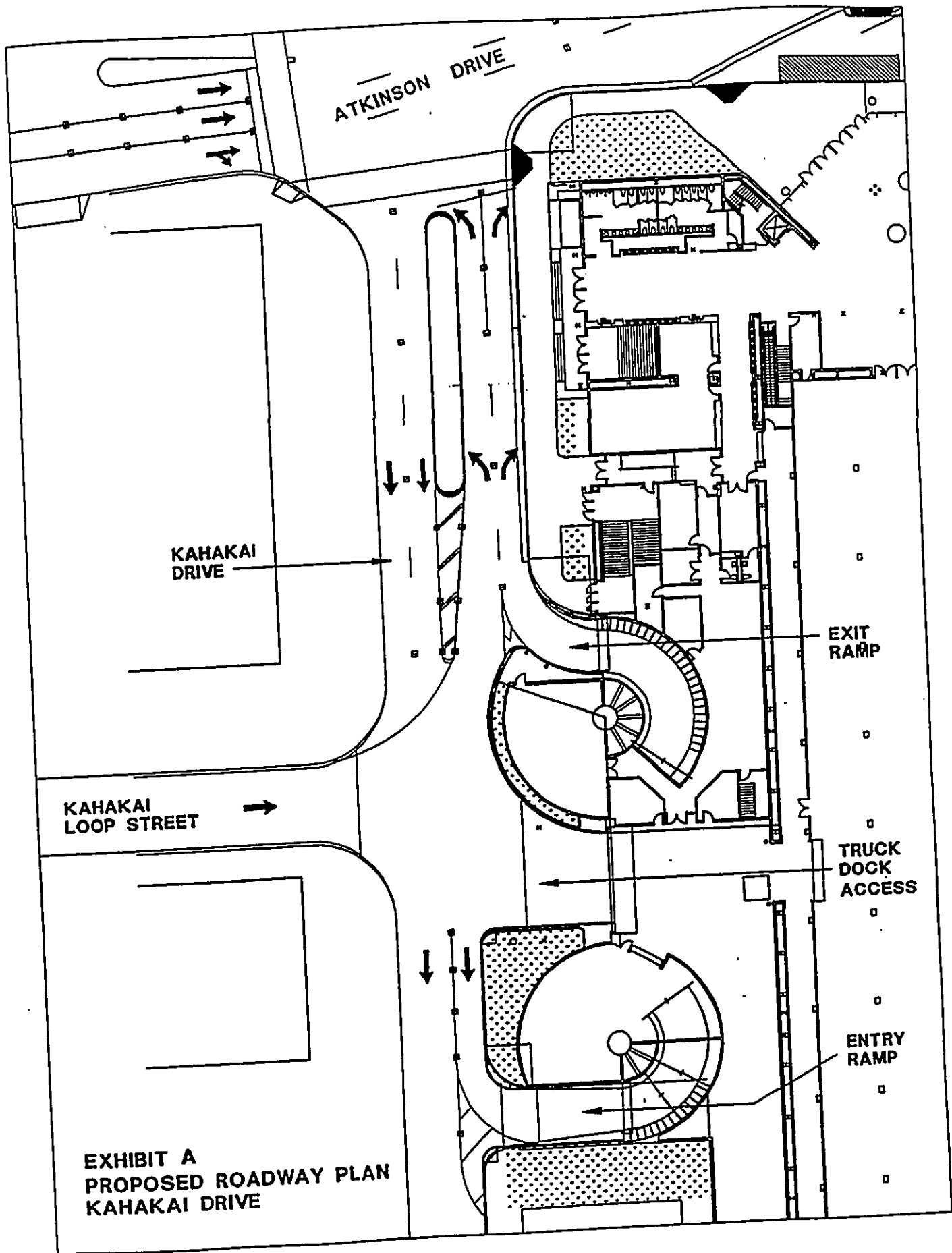
Sincerely,



Alan S. Hayashi
Executive Director

Attachments

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



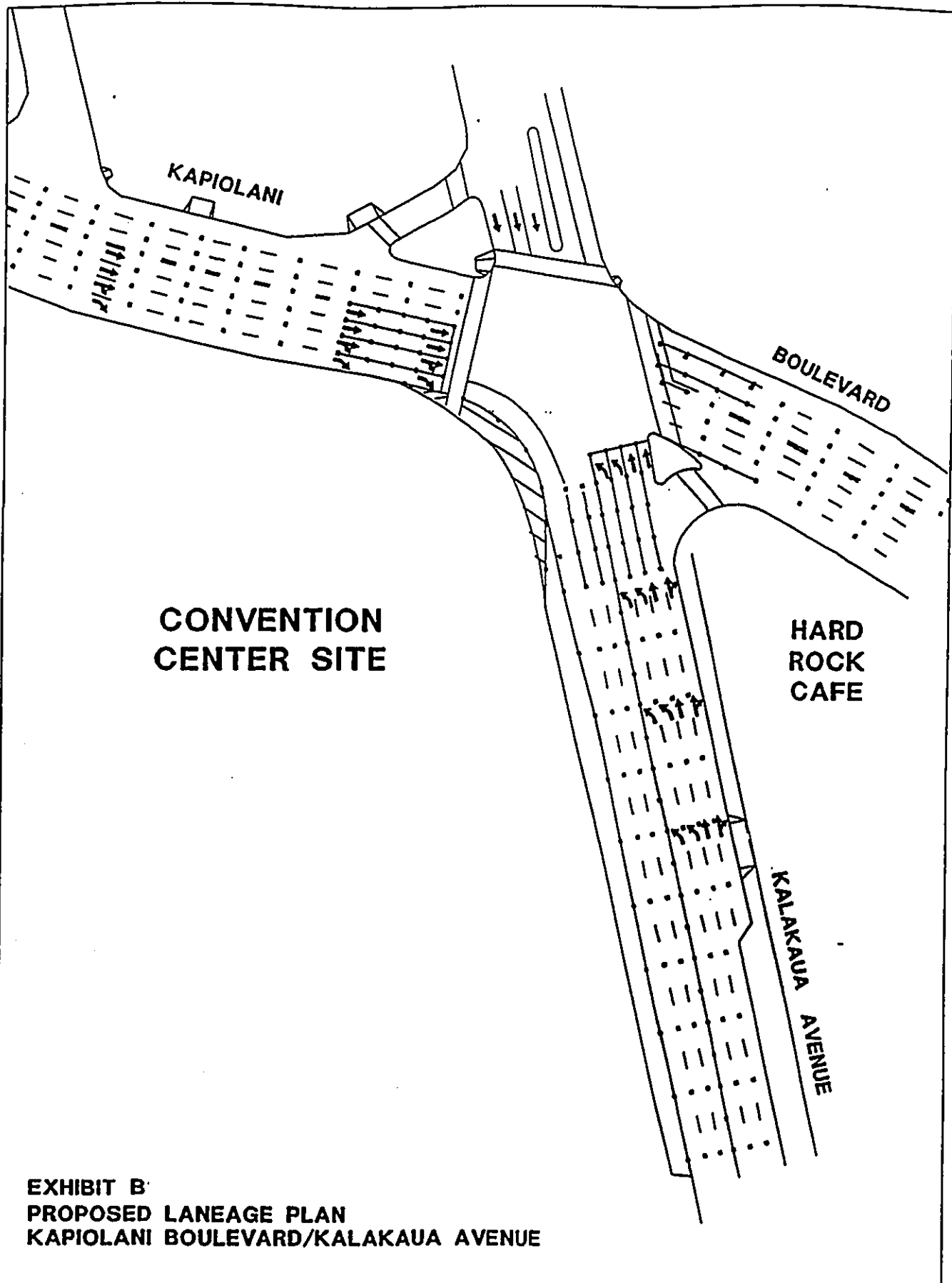


EXHIBIT B
PROPOSED LANEAGE PLAN
KAPIOLANI BOULEVARD/KALAKAUA AVENUE

KAPIOLANI PARK PRESERVATION SOCIETY

P.O. BOX 90183. HONOLULU. HAWAII 96835

March 24, 1995

Mr. Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
MAR 28 1995

WILLIAM OKAMOTO & ASSOCIATES

Dear Mr. Hayashi:

Subject: Hawaii Convention Center
Draft Environmental Impact Statement
Tax Map Key: 2-3-35: 01
Honolulu, Oahu, Hawaii

Thank you for forwarding Volumes I & II of the Hawaii Convention Center Draft Environmental Impact Statement to us for our review and input.

Your letter of January 27, 1995 in response to our previously expressed concerns regarding possible adverse impacts to the historical Promenade, Kalakaua Avenue Bridge, and Ala Wai Canal by the proposed Convention Center, and the vagueness of the Draft EIS have only compounded our concerns and has brought up additional very serious concerns and questions about the project.

Initially the proposed Convention Center at the "Aloha Motors Site" was portrayed as a project adjacent to the Historic Promenade and Ala Wai Canal. Our review of the Draft EIS reveals that the project actually incorporates the Promenade into the Convention Center project, and that the Promenade is proposed to be an integral part of the Convention Center site, with the primary Convention Center structure protruding 26 feet upon the Promenade. Additionally, the focal point of this intrusion is a massive stairway and grove of coconut palms displacing five of the Banyan trees of the historic allee. The Grand stairway is proposed to be the principal pedestrian entrance to the Convention Center. The entire Promenade frontage of the Convention Center is proposed to be a Convention Center function area with the grand stairway also serving as the Convention Center outdoor theater.

Various illustrations contained within the Draft EIS portray several different concepts for the design of the Promenade. Some include a pedestrian bridge over the Ala Wai Canal connecting the grand stairway with the Waikiki side of the Canal. There is indication that a boat dock may become part of the Promenade landscape providing boat taxi service to the Convention Center. It is expressed that alterations may be necessary to the Ala Moana Bridge and that the design does not preclude additional bridges across the Ala Wai Canal. Such vagueness makes proper analysis, of the possible cumulative adverse impact of all the proposed possibilities upon the historic cultural park district of the Ala Wai Canal, Kalakaua Avenue Bridge, and the park lands including the Promenade, impossible.

KAPIOLANI PARK PRESERVATION SOCIETY

P. O. BOX 90183. HONOLULU. HAWAII 96835
Mr. Alan S. Hayashi
Convention Center Authority
March 24, 1995
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Many pertinent questions remain unanswered in the Draft EIS:

1. Have the National Trust for Historic Preservation, The State Office for Historic Preservation, The Advisory Council and interested Historical Preservation Organizations determined that the intrusion of the Convention Center Building upon the Promenade and the destruction of the very important historic allee of trees is not an adverse impact upon the historical quality and character of this historical cultural landscape?

We and the community consider the taking of historic park land for development purpose to be an unconscionable act. The Congress of the United States finds and declares that:

- a. the spirit and direction of the Nation are founded upon and reflected in its historic Heritage;
- b. the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people;
- c. the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans;

therefore, in what way does the insensitive intrusion upon the historical park lands of the Ala Wai by the Convention Center Authority, a State of Hawaii agency, comply with the findings of Congress and to be in the best public interest?

2. Why has a set back from the Promenade not been considered to protect the trees and historical integrity of the park? Has such set back not been recommended? What would be a proper set back so as not to adversely impact the Promenade, landscape and trees? Who is the arborist that determined the trees would not be adversely effected with the proposed environment changes?

3. Several of the historic Banyan trees have died in recent years. Was this due to neglect by the City and County of Honolulu, the custodians of this historic property, or was the demise of the trees due to contamination of the subsurface water from the "Aloha Motors" Convention Center Site percolating into the Promenade Park site? Has the subsurface water of the Convention Center site been tested for contaminants? If the subsurface water is contaminated, what is being done to remedy the problem?

4. Is the proposed project's possible alteration and addition of bridges over the Ala Wai Canal and destruction of the Promenade landscape in accordance with the comprehensive statewide historic preservation plan which has been approved by the Secretary of the Interior after considering its relationship to the comprehensive statewide outdoor recreation plan prepared pursuant to the Land and Water Conservation Fund Act of 1965 (78 Stat. 879)?

KAPIOLANI PARK PRESERVATION SOCIETY

P.O. BOX 90163. HONOLULU. HAWAII 96835

Mr. Alan Hayashi
Convention Center Authority
March 24, 1995
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5. Section 6E-9 of the Hawaii State Preservation Act provides that whenever there is any project by any government agency on lands which are owned or controlled by the State or its political subdivisions and which have historic property or value, one per cent of the appropriations for the project or so much thereof as may be necessary, shall be expended for the investigation, recording, preservation, and salvage of such historical property or value. In compliance with this law, how much money has been set aside by the Convention Center Authority for this purpose? What is the program that is to be implemented to comply with this law?

6. While the Draft EIS acknowledges that the Ala Wai Canal, Promenade, and Kalakaua Avenue Bridge are historic properties, it does not address the historical or cultural significance of these portions of the Ala Wai Cultural Park District as they do of other less important historical sites in the Waikiki Area. Why were these sites not addressed in the Draft EIS? Should they not be?

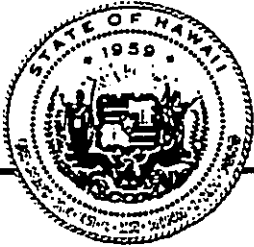
7. The Draft EIS States that "It has not been resolved at this time whether an NPDES permit to handle discharge dewatering effluent from construction activity will be needed.", it further states, "Adherence to State of Hawaii regulations governing the dewatering of construction sites will insure that this aspect of the project will not have an adverse impact on the Ala Wai Canal. Because the site exceeds five acres, the project must submit and comply with erosion control measures and other Best Management Practices to limit runoff contamination of the Ala Wai Canal resulting from heavy rainfall during construction (HAR §11-54-03)." In the spirit of "Best Management Practices", why would there be any question as to the need for a NPDES permit during the construction period? Is not a NPDES permit required for the site for surface water run off into storm drains or the Ala Wai Canal after construction is completed? It would appear that a NPDES permit is inevitable, why then not get the permit prior to construction? Is this an attempt to circumvent a section 106 review prior to commencement of construction?

8. Is, not including bridge alterations and additions across the Ala Wai Canal and Promenade alterations relative to the Convention Center project, as described in the Draft EIS, a segmentation of the project permit process and in violation of state law as is defined in; Hawaii 1000 Friends vs. City and County of Honolulu, Ref. 858, P.2d page 726 1993?

Again, we appreciate this opportunity to express our concerns and look forward to your response to our questions.

KAPIOLANI PARK PRESERVATION SOCIETY

Allan Voronaeff, President



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Allan Voronaeff
President
Kapiolani Park Preservation Society
P.O. Box 90183
Honolulu, Hawaii 96835

Dear Mr. Voronaeff:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Based on yours and other comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

The SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

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July 17, 1995
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None of the illustrations in the Draft EIS depicts a pedestrian bridge over the Ala Wai Canal or any improvements suggestive of boat docks along the Ala Wai Canal. Figure 2-4 showing the east elevation from Kalakaua Avenue shows a portion of the existing Ala Moana Boulevard Bridge and a portion of the existing tiered configuration of the Promenade along the Ala Wai Canal. Similarly, the west elevation through Kahakai Drive in Figure 2-5 shows the existing tier on the Promenade with a figure fishing from the wall. No construction affecting the Ala Wai Promenade, Ala Wai Canal, Ala Moana Boulevard Bridge, or the Kalakaua Avenue Bridge are being proposed in conjunction with the convention center project.

Based on the traffic study in the Draft EIS, no bridge widenings, boat transportation facilities, or additional pedestrian bridges are necessary for the project. Thus, these would not be considered phased increments of the project nor would the project represent a commitment to build them. If any bridge or boat transportation facilities are proposed on the Ala Wai Canal in the future, the proposal would be reviewed as a separate action pursuant to Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) because they would likely involve public funds, be built on public lands and affect historic properties. Such improvements would also be subject to review pursuant to Section 106 of the National Historic Preservation Act.

We offer the following responses to your numbered comments, respectively:

1. As mentioned previously, the design of the convention center has been revised to remove any encroachment on the Ala Wai Promenade.
2. Although no setback was required along the Ala Wai Promenade, the need to protect the banyan trees was discussed in the Environmental Assessment published in May, 1994. The design/builder has requested a permit from the City Department of Parks and Recreation pursuant to Section 41-13.8, Revised Ordinances of Honolulu, to conduct excavation that will remove a portion of the root systems and to prune the Banyan trees in the Ala Wai Promenade which are adjacent to the convention center boundary. On-going consultation with the City's certified arborist has been pursued to formulate a plan

Mr. Allan Voronaeff
July 17, 1995
Page 3

to minimize adverse impacts to the trees. The plan includes procedures such as for trimming the roots, installing a root barrier, irrigation and monitoring. Procedures and requirements will also be imposed on tree pruning. The design/builder will install an 8-foot high fence along the boundary between the convention center and the Promenade to keep construction activities out of the Promenade. The certified arborist who is working with the design/builder in behalf of the Committee is Mr. Steve Nimz. The Final EIS will include a discussion of the foregoing efforts to protect the banyan trees in the Ala Wai Promenade.

3. The subsurface testing for hazardous materials did not indicate that the banyan trees on the Promenade were adversely affected by contamination. An informal observation does not indicate that the trees adjacent to the convention center site are in any worse condition than other trees along the Ala Wai promenade from Kalakaua Avenue to Ala Moana Boulevard. The most notable gaps between the trees are adjacent to the low-rise residential areas west of the Summer Palace condominium. There appears to be no gaps along the line of trees immediately adjacent to the property line of the convention center site.

In conjunction with the remediation of the project site, groundwater around known areas of hazardous waste contamination were tested to determine the extent of contamination. This information was used to determine the extent of the area to be remediated. If additional hazardous wastes are discovered, similar testing would be required to determine the extent of contamination in order to formulate a remediation plan.

4. There are no bridges proposed over the Ala Wai Canal in conjunction with the construction of the convention center.
5. Again, the revised design of the convention center will not encroach onto to Ala Wai Promenade.
6. No improvements are proposed in conjunction with the convention center that would impact the Ala Wai Canal and Kalakaua Bridge. Hence, no discussion of impacts is included. The Final EIS will include a discussion of

Mr. Allan Voronaeff
July 17, 1995
Page 4

impacts that the convention center will have on the historic character of the Ala Wai Promenade.

7. The design/builder has obtained approval by the State Department of Health of a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction. The design/builder has also applied for an NPDES General Permit for Construction Activity Dewatering. Inasmuch as the convention center site will continue to use existing storm drainage outlets into the Ala Wai Canal, no NPDES permit for new drainage outlets would be required. There was no attempt to circumvent the Section 106 review by avoiding NPDES permits.
8. Please refer to our response in the sixth paragraph of this letter which discusses this aspect of the Hawaii EIS Law.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



DIAMOND HEAD/KAPAHULU/ST. LOUIS HEIGHTS NEIGHBORHOOD BOARD NO. 5
530 SOUTH KING STREET, R.M. 400 • HONOLULU, HAWAII 96813

March 25, 1995

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813

RECEIVED
MAR 28 1995

Attention: Mr. Alan S. Hayashi

Subject: Draft Environmental Impact Statement (DEIS)
Hawai'i Convention Center
Tax map Key: 2-3-35:01
Honolulu, Oahu, Hawaii

Dear Mr. Hayashi:

Thank you for the opportunity to respond to the Hawai'i Convention Center DEIS. Our comments and concerns are as follows:

IMPACT on ELIGIBLE AND REGISTERED HISTORIC SITES

The Ala Wai Canal was built in the first quarter of the century and was registered on the State Register of Historic Places in 1992. The Canal is deemed eligible for the National Register of Historic Places. The Ala Wai Promenade is contiguous to the south west segment of the Canal and is landscaped with mature ficus trees which have been placed on the City's register of exceptional trees under ROH Section 41. The Promenade is deemed eligible for both the State and National Register of Historic Places. The Ala Wai Canal, the Kalakaua Bridge, and the Ala Wai Promenade and Parklands comprise a historic cultural park district.

Excavation of the Hawaii Convention Center is proposed to encroach twenty-six (26) feet into the Promenade, with the subsurface loading dock and terraced central stairway and surface staging structure to be built extending into the historic Promenade towards the Canal. The DEIS Site Plan illustrates that the double row of historic trees will be divided into two sections with a break impacting and causing the displacement of five registered exceptional trees in the historic landscape.



Oahu's Neighborhood Board System - Established 1973

Instead of an adequate setback being complied with to preserve the historic integrity of the Promenade in both feature and design, the Hawai'i Convention Center Plan integrates and modifies the historic cultural landscape to become incorporated into a contemporary structure of larger scale.

Further, the Hawai'i Convention Center Plan has been curiously segmented from the cumulative plan and excludes ancillary facilities to the site. However, certain convention center foot-traffic mitigation measures proposed publicly with increasing frequency entertain the concept of building pedestrian bridges and loading docks for crossing at this location and at other points along the Canal.

Would not any proposal to encroach, including physical disturbance and visual interference, and other threats of direct or indirect adverse impacts to these Registered and Eligible Sites be subject to the National Historic Preservation Act of 1966, as revised in 1992; and subsequently be subject to the Federal Section 106 Review process?

INCOMPLETE SOIL REMEDIATION

It is apparent in the DEIS that proper soil remediation measures at this site have not been correctly determined, undertaken, or completed in preparation of this site in anticipation of construction of the proposed convention center. Public observances reveal that within the past three years excavated soil remediation pits at the site were filled with truckloads of concrete rather than rock or gravel, which is normally used following soil remediation in anticipation of further excavation for construction. The question is, why was this unusual tactic implemented? Accountings describe that the distinct odor of petroleum contaminants heavily permeated the site following excavation of the soil remediation pits. It appears that sealing the surface was arbitrarily determined to be preferable over extending the remediation area to completely extract the contaminants.

Moreover, as acknowledged in the DEIS, petroleum and other toxic contaminants have penetrated the surface and percolated to the groundwater level. As petroleum is lighter than water and would seek the line of least resistance, it would disburse over a wider area on top of the water table - possibly entering contiguous properties as well as the adjacent receiving waters of the Ala Wai Canal and beyond.

Would it not be environmentally responsible to continue the proper remediation process? Initially, test borings six to ten feet from the original soil remediation pits may now be required to determine the full extent of petroleum contamination.

In addition to contiguous receiving waters currently being at risk and vulnerable to infiltration of remaining contaminants from previous use of the site, the shoreline receiving waters may also be at risk and vulnerable to disturbed pockets of contaminants and contaminated groundwater, as well as toxins produced and disbursed during future construction of the project, by way of surface water and ground percolation or storm drain channelization - regardless of a controlled dewatering process or presence of lined detention basins.

The DEIS discloses that, absent discharge points into the Ala Wai Canal, the convention center's storm drainage system will connect into the City and County's storm drain system (NPDES Permit HI 0021229). Would not a separate National Pollutant Discharge Elimination System permit be required prior to excavation and construction on the site in order to ensure project-specific Best Management Practices given the high groundwater level and proximity of receiving waters to the site?

IMPACT on SURROUNDING TRAFFIC PATTERNS

Attendance, participant and ancillary service traffic generated by and at the proposed location for the Hawai'i Convention Center will assuredly directly affect and compound existing local traffic congestion. It is unknown at this time specifically to what degree the existing congestion will be compounded. It is quite conceivable that during morning rush hour when convention center events are being conducted at the proposed location, residents requiring access to any business centers west of the proposed convention center site, including Downtown Honolulu, will either become landlocked or will be forced to drive east and half-way around Oahu to access their place of business.

The communities of Kapahulu, Diamond Head and St. Louis Heights, which comprise this Neighborhood Board area, rely on the H-1 Freeway as a primary route, Ala Moana Boulevard and Kapiolani Avenue as alternative routes, and Kalakaua Avenue, Date Street, and Kapahulu Avenue, respectively, for direct ingress and egress. The freeway and main traffic thoroughfares and arteries are also relied upon heavily by residents, hotel guests, employees and ancillary services ingressing and egressing Waikiki; and by residents, employees and ancillary services ingressing and egressing all communities to the east, including but not limited to Kahala, Kouliouou, Aina Haina, and Hawaii Kai.

Hawai'i Convention Center DEIS
March 25, 1995
Page 4 of 4

It is premature to comment further at this time, as the regional traffic study and subsequent report on the statistics of existing traffic conditions, the anticipated convention center traffic impact, and any proposed solutions will not be completed for many months.

In conclusion, as the State Supreme Court has ruled that "the cumulative impact of the larger project... must be assessed before a determination can be made..." (SP 91-0457), the Hawai'i Convention Center DEIS appears incomplete and issued prematurely in view of the absence of a cumulative plan including infrastructure modifications and ancillary facilities, a comprehensive soil remediation plan, and a best management practices requirement.

Thank you for your serious consideration of the above comments and concerns. We recognize that it is the Convention Center Authority's ultimate goal to strive for excellence in creating and constructing a world-recognized facility to strengthen and enhance our Island economy. In consideration of the public interest, we respectfully request that the Convention Center Authority responsibly address the above comments as they are offered with concern for the general health and welfare of our island communities.

Most sincerely,



Michelle Spalding Matson, Vice Chair
Chair, Committee on Planning and Zoning
Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board #5



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Michelle Spalding Matson
Vice Chair
Neighborhood Board No. 5
530 South King Street, Room 400
Honolulu, Hawaii 96813

Dear Ms. Matson:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 25, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Impact on Eligible and Registered Historic Sites

Based on yours and other comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

The SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional

Ms. Michelle Spalding Matson
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Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

Based on the traffic study in the Draft EIS, no bridge widenings, boat transportation facilities, or additional pedestrian bridges are necessary for the project. Thus, these would not be considered phased increments of the project nor would the project represents a commitment to build them.

If any bridge or boat transportation facilities are proposed on the Ala Wai Canal in the future, the proposal would be reviewed as a separate action pursuant to Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) because they would likely involve public funds, be built on public lands and affect historic properties. Such improvements would also be subject to review pursuant to Section 106 of the National Historic Preservation Act.

The Draft EIS identified the Ala Wai Promenade as eligible for listing on the National Register of Historic Places. You are correct that any significant direct or indirect impacts on sites listed or eligible for listing on the National Historic Register would be subject to the Federal Section 106 Review process. The revised design is intended to elicit a finding of no impact from the State Historic Preservation Division at which point no further review pursuant to the Federal Section 106 would be required.

As discussed in the Draft EIS, site remediation of known contaminants was conducted at the convention center site in compliance with applicable Federal and State laws. In March 1992, after a site investigation, the San Francisco (Region IX) office of the Environmental Protection Agency (EPA) recommended "no further remedial action" was necessary under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). In April 1993, the State of Hawaii Department of Health completed their review of site remediation and concluded that no further actions were necessary. In essence, known sources of contamination had presumably been removed or treated to reduce concentrations of contaminants to DOH cleanup goals.

Your observation of concrete filling is inconsistent with cleanup efforts at the site. Based on your description, however, what you may have observed was one of several structural load tests that were conducted on the site in

Ms. Michelle Spalding Matson
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conjunction with the previous private convention center complex proposal.

When contaminants are found that have the potential for being dispersed through the groundwater table, the testing method required includes testing of groundwater in the vicinity of the known contamination, particularly down-gradient areas to determine the extent of contamination and, hence, the area subject to remediation. This was done previously for the convention center site and will be required if additional areas of contamination are found during construction.

As discussed in the Draft EIS, although all known hazardous waste has been removed from the site, the potential exists for contaminated soils and/or pockets of contaminated groundwater. This possibility will be addressed by the designer/builder team in their hazardous materials contingency plan. Any hazardous material encountered during construction will be handled and disposed of in accordance with applicable State and Federal regulations. This will prevent dispersal of contamination during the construction process.

The Draft EIS states that runoff from the project site will be discharged into existing drain lines serving the site. The design/builder has applied for and obtained approval by the State Department of Health of a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction. The permit requires compliance with a Best Management Practices (BMP) plan. Structural erosion and sediment control measures required by the plan include constructing berms to contain runoff and installing silt fences to trap sediment.

We disagree that attendance, participant and ancillary service traffic generated by and at the proposed convention center facility will necessarily directly affect and compound existing local traffic congestion. The EIS traffic study identifies a number of planned roadway improvements and recommended operational traffic improvements to mitigate the convention center traffic impacts. Furthermore, during the weekday AM peak traffic period, the majority of traffic travelling to the convention center will originate from Waikiki hotels. Through establishment of a transportation management plan by the convention center operator, shuttle buses, taxis and vehicles from Waikiki travelling to the convention center will be directed to approach the Center from

Ms. Michelle Spalding Matson
July 17, 1995
Page 4

westbound Ala Moana Boulevard, and right-turn onto mauka-bound Atkinson Drive. Essentially, convention center-bound traffic will be travelling in the opposite direction from that of the primary local commuter traffic flow originating from east Honolulu and the H-1 Freeway heading toward downtown Honolulu (west of the convention center).

In accordance with your comment indicating the traffic routes which the communities of Kapahulu, Diamond Head, and St. Louis Heights rely on, the traffic study prepared for the environmental assessment (EA) for the convention center clearly demonstrates that these areas are located well beyond the Center's study area. Also, the study area for the EIS traffic study was established based upon the intersections anticipated to be most significantly impacted by convention center traffic. Any future increase of traffic on the H-1 Freeway, Date Street, and Kapahulu Avenue would be more appropriately addressed through the City's Waikiki Regional Traffic Impact Plan which is currently being prepared and anticipated for completion by August 1995. The study area limits for the City's regional study are the H-1 Freeway, Pensacola Street, Ala Moana Boulevard/Kalakaua Avenue, and Kapahulu Avenue. The Waikiki Regional Traffic Impact Plan is intended to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). The State Convention Center Authority (CCA) has participated in a number of meetings with the City Department of Transportation Services, where it was agreed that the City would incorporate the traffic data from the convention center's traffic study into its regional study. Further, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

The convention center traffic is not expected to significantly impact the major corridors into or out of communities to the east of the Center (i.e., Kahala, Kuliouou, Aina Haina, and Hawaii Kai) since the volumes of traffic distributed over these major corridors are not expected to be significant.

As discussed previously, there are no proposed ancillary facilities such as bridge improvements or boat transportation facilities that are proposed, required, or can be considered a secondary development of the convention center. Therefore,

Ms. Michelle Spalding Matson
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Page 5

the impacts associated with the construction of such facilities is not discussed in the EIS. The Draft EIS describes all proposed infrastructure modifications and their impacts in Chapter 5.

A comprehensive soil remediation plan is not required by Federal or State law, but the Convention Center Authority required the design/builder to prepare a contingency plan in the event that any previously unknown contamination is found. Neither this contingency plan nor the best management practices plans are required in conjunction with the filing of the Final EIS. Chapter 343, Hawaii Revised Statutes is clear that the EIS is intended to be an information disclosure document that is prepared at an early stage of the development process, in most cases well before various permit applications are prepared and filed.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



McCULLY/MOILILI NEIGHBORHOOD BOARD NO. 8

c/o NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

March 23, 1995

Convention Center Authority
The State of Hawai'i
841 Bishop Street, Room 2222
Honolulu, Hawai'i 96813
ATTN: Alan S. Hayashi

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOCIATES, INC.

Subject: Comments on Draft Environmental Impact Statement

Dear Mr. Hayashi:

We are very appreciative of the opportunity to comment on the draft EIS, as well as the generous, forthright approach of the Convention Center Authority and you, its Executive Director in the planning process, and of Earl Matsukawa and his staff of Wilson Okamoto & Associates in encouraging community involvement. We also appreciate the work of the Technical Evaluation Team of the Convention Center Community Network, which has provided insightful critiques of the Draft EIS. We hope their analyses will be fully addressed in the next stage of development of the EIS.

The Environmental Impact Statement is supposed to disclose "...the environmental effects of a proposed action, effects of a proposed action on the economic and social welfare of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects." (§343-2 HRS). Unfortunately, the Convention Center Draft EIS falls short of what we need and deserve. In their efforts to serve the interests of the promoters of the Center, many of the consultants have denied the difficult problems which must be overcome. There appears to be some confusion as to the need for the EIS to address effects of the economic activities arising out of the proposed Convention Center.

As residents of one of three neighborhoods adjoining the Convention Center site, we in Mo'ili'ili—McCully are particularly concerned about the economic and social impacts of the proposed development of the Convention Center. We and many others have already conveyed our concern about traffic and infrastructure impacts, which have not been realistically appraised. While these concerns remain strong, this comment will focus on problems with the Draft EIS regarding economic and social impacts.

The projection of the Economic and Fiscal Assessment provides the basis of the Social Assessment and other parts of the EIS. It fails to provide objective data and ranges of possible future outcomes upon which to plan. It accepts uncritically the *goal* of convention center boosters, that "The development of the Convention Center will fulfill long-held hopes for the revitalization and broadening of Hawai'i's



Oahu's Neighborhood Board System—Established 1973

Mr. Alan S. Hayashi
March 23, 1995
Page 2

economic base," as certainty. It refuses to consider any other possible outcomes. No assessment is made of the likelihood that this goal will be realized, that the outcomes could be other than the best case possibilities. Perhaps most seriously, it fails to adequately identify the basic assumptions about the number and types of events which may occur in the future and to evaluate impacts should the Center be less successful in attracting conventions. Why? Perhaps because its projections of economic impacts are all based on "projections made by the Hawai'i Convention Center Authority" (exhibit 1A) and the Hawai'i Visitor's Bureau.

As citizens and taxpayers we have a right to a more objective assessment of the range of possibilities. The EIS must be revised to reflect a realistic range of possible economic outcomes.

The projection that the center will host about 60 events per year, with 7,500 attendees per event and attract approximately 630,000 new visitors per year represents the most favorable, not necessarily the most likely, outcome. We know from the experience of many mainland cities that, if you build another convention center, people might not beat a path to it. The economic and fiscal assessment, therefore, must consider several possible scenarios, ranging from the most favorable to the least.

The Projected Fiscal Impacts from HCC (page 11) indicates a net loss to the City and County of Honolulu each year until 2008, while State revenues are projected to steadily increase from the first year of operation. This is surely a negative impact, which under less favorable possibilities could extend for a longer period, particularly if 7,700 new hotel rooms are not built to increase property tax revenue. Mitigation measures for this undesirable impact should be discussed.

The Social Impact Assessment addresses the customary areas of concern and succeeds in identifying problems and their meaning and importance to the community. It falls short, however, in attempting to identify needs and opportunities for mitigation of unfavorable impacts. What will be the impact of all the extra people and new hotels? How can the negative effects of increased tourism, higher cost of housing, spreading gridlock, and increased crime be mitigated.

"It is expected," according to the SIA, "that a typical three-day event would have 7,500 people; this would occur about 50 times a year. Events for groups of 10,000 persons are estimated to occur during 15 to 20 days a year. Larger events for up to 14,000 people would occur every three years." (page 7) What is the basis of this estimate? How was it developed, and by whom? Does this not represent the most favorable case? What are the other possible scenarios?

Section 4.3.4, "Recreation," abandons the assumption of 15,000 new visitors as it makes the bizarre argument that "The Hawai'i Convention Center would not

Mr. Alan S. Hayashi
March 23, 1995
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cause an increase in the visitor population in that the project does not include visitor units." "Hence," it continues, "the overall number of recreational facility users is not expected to increase." Since most recreational facilities are funded and staffed by the City, while the increased tax revenues brought by visitors flow exclusively to the State, this is a very important topic of concern. We neighbors of the center who pay for and use the surrounding recreational facilities are very concerned that this impact be adequately addressed. Why are not mitigation measures to alleviate anticipated crowding of nearby beaches identified?

The report indicates that the portion of the promenade closest to the center will be "improved." What is the basis of this judgement? What will constitute "improvement," from whose point of view, and how will this impact those of us who pay for and use this area?

In short, the Social Impacts Study is an excellent draft, but needs work, particularly in the areas of consideration of other, less favorable possible outcomes, and in documenting the bases of its assumptions and values.

We sincerely hope that the Convention Center will be a net contributor to the quality of life for us, its neighbors, as well as to the economy of the State. For that to happen, the promoters, planners and consultants still have a great deal of work ahead, to produce a realistic, believable EIS.

We look forward to continued participation in this process.

Aloha nō,



Bart Aronoff
Chair, Planning & Traffic Committee
McCully/Mo'ili'ili Neighborhood Board

c: The Honorable Ben Cayetano
Mr. Gary L. Gill
✓ Mr. Earl K. Matsukawa



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Bart Aronoff
Chair, Planning & Traffic Committee
Neighborhood Board No. 8
c/o Neighborhood Commission
City Hall, Room 400
Honolulu, Hawaii 96813

Dear Mr. Aronoff:

Subject: Hawaii's Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Your opinion regarding the consultants' denial of "difficult problems" is acknowledged. Based on the comments received on the Draft EIS, numerous revisions have been made that address many of the areas of concern you have cited. Much effort in the revisions has been directed to clarifying issues and supporting the analyses originally presented.

The following responds to your comments regarding the Social Impact Assessment (SIA) and the Economic and Fiscal Assessment:

1. The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS, as well as follow-up discussions with various agencies, information that was not previously available and additional research. It has also been revised to provide a range of projected economic impact estimates, with two sets of assumptions establishing a "lower attendance and spending" scenario and a "higher attendance and spending" scenario.

Attendance estimates on the annual number of convention events and their sizes were provided by the CCA as a basis for all of the technical studies, including the Economic and Fiscal Impact Assessment. The revised study includes a letter from the consulting firm of Group 2+ International of Bellevue, Washington, the operations and

Mr. Bart Aronoff
 July 17, 1995
 Page 2

food service consultant to the CCA, which discusses the basis for CCA's attendance projections. Identified are past studies by the Hawaii Visitors Bureau and Hawaii Convention Park Council, as well as convention attendee growth rate estimates by the leading publications in the industry, including *Trade Show Weekly*, *Association Management*, *Meetings & Conventions*, and *Successful Meetings*. Toward addressing comments that the Economic and Fiscal Impact Assessment should be based on a range of attendance assumptions, the CCA reviewed their estimates and developed a more conservative projection to serve as a lower estimate. The lower attendance estimate is 6,200 attendees while the higher estimate remains 7,500 attendees. The frequency of events are the same for both and increases from 30 events in the first year to 60 events in the tenth year.

Another key revision in establishing a range of assumptions was in the daily spending rate. In estimating a range of expenditures per person, reviewed were Hawaii Visitors Bureau (HVB) surveys on the meeting and convention markets as reported in its Visitor Expenditure Reports for 1991, 1992, and 1993, which are the most recently available. The HVB data shows that in 1993, westbound meeting and convention visitors spent \$617 per person per day while eastbound meeting and convention travelers spent \$720, as shown in the table below:

	<u>Personal</u>	<u>Suppl.</u>	<u>Total</u>	<u>% Mix</u>
<u>Westbound Travelers:</u>				
Convention Delegates	\$ 152	\$ 406	\$ 558	76%
Corporate Mtg. Delegates	<u>202</u>	<u>602</u>	<u>804</u>	24%
Weighted Average	\$ 164	\$ 453	\$ 617	100%
<u>Eastbound Travelers:</u>				
Convention Delegates	\$ 236	\$ 406	\$ 642	72%
Corporate Mtg. Delegates	<u>320</u>	<u>602</u>	<u>922</u>	28%
Weighted Average	\$ 260	\$ 461	\$ 720	100%

Source: Hawaii Visitors Bureau, Visitor Expenditure Report, 1993

For the future, westbound visitors were estimated to represent 85% of delegates for exhibitors, and eastbound visitors 15%. This results in the weighted average expenditure per day for all delegates or exhibitors of \$632 in 1993 dollars or an estimated \$652 in 1994 dollars.

In the future, average spending per capita could be lower than historically, since the State is anticipated to attract larger events. Also, after reviewing data on supplementary expenditures per capita at New Orleans and Orlando convention centers, the \$650 benchmark was adjusted downward as follows:

	Personal	Supplemental	Total
Benchmark*	\$182	\$468	\$650
Scenario I: Adjustment from benchmark Projected Spending	<u>100%</u> \$182	<u>(40%)</u> \$238	\$465
Scenario II: Adjustment from benchmark Projected spending	<u>100%</u> \$182	<u>(20%)</u> \$373	\$555

* Based on 1993 data on Hawaii meeting and convention visitor spending, inflated to 1994 dollars at 2.8% and assuming a mix of 15% eastbound visitors and 85% westbound visitors.

Thus, the economic impact assessment assumes that supplementary expenditures are about 20% to 40% less than observed historically in Hawaii, while personal expenditures for delegates/exhibitors and attendees remain the same at \$182 per day. This results in an average total per delegate/exhibitor expenditure of \$465 to \$555 per day, in 1994 dollars. This range is used as a basis for the assessing of the low (Scenario I) and high range (Scenario II) economic impact, respectively.

As a result of the adjustment in expenditure rates, the total effect of direct, indirect and induced spending have been revised in the economic and fiscal impact assessment for the Final EIS.

Mr. Bart Aronoff
July 17, 1995
Page 4

2. With respect to projected fiscal impacts, one of the revisions is the assumption regarding distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's share of the statewide TAT collection could range from \$7.3 to \$8.9 million in the revised 2008 projection. The County's net new revenue projection is also positive, ranging from \$3.6 to \$5.4 million per year in 2008. As in the case of the prior study, both the State and the County incur a negative fiscal impact during construction of the Center, before its economic benefits can be realized. These losses are expected to be more than compensated, however, when the Center becomes operational.

With regard to new hotel room construction, the revised economic and fiscal assessment estimates the net new hotel room night demand, Statewide, in the year 2008 to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 conventioner days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room occupancy rates at the existing 28,414 hotel units on Oahu from 80 to 90 percent. Another 300 units would be effectively added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it is anticipated that visitors (other than conventioners) will continue to shift their demand to the Neighbor Islands which could be expected to absorb about 60 percent of this demand. The remaining 720 units could be met by development on Oahu, without rezoning, at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units). Using the same assessment on the "lower attendance and spending" demand of 6,130 room nights, new hotel room construction would amount to 360 units. Thus, the

Mr. Bart Aronoff
July 17, 1995
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projected real property taxes for the lower and higher attendance as spending scenarios are based on the construction of 360 and 720 new hotel units on Oahu, respectively between 1999 and 2008, respectively.

This is considered a conservative estimate because: 1) it is based on hotel room demand, or expected occupied rooms, whereas property taxes would be paid on the entire hotel property regardless of room occupancy; 2) additional property taxes would be generated from new nonhotel development such as new development or renovations of existing commercial retail, office and industrial properties and new homes for new residents attracted by direct, indirect and induced employment generated by the convention center; and, 3) there are potentially increasing property values at properties that are not redeveloped, but appreciate in value due to their location near to other properties that are improved, or due to the higher sales levels attributable to the business the convention center stimulates. As a result, the County is expected to indirectly experience further tax benefits beyond those modeled.

3. The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas identified susceptible to redevelopment in the vicinity. It clearly states, however, that this impact on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly

Mr. Bart Aronoff
July 17, 1995
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so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

4. As discussed previously, the estimated number of annual events and the range of size at the convention center was provided by the CCA, based on research by its consultant and other organizations familiar with the convention business.
5. As clarified in a prior response, 360 to 720 new hotel units on Oahu may be necessary to accommodate the demands of the convention center. This represents an increase of approximately 1 percent to 2.5 percent over the present number of hotel rooms on the island. Hence, the major impact of the convention center would be to increase occupancy rates rather than to cause the construction of new hotel rooms. In terms of impacts on recreational facilities, therefore, the impacts would be comparable to prior periods of high occupancy. Nevertheless, the location of the convention center will likely increase demand on recreational facilities within walking distance of it. This impact is discussed in the revised Social Impact Assessment in the Final EIS. Also, as discussed in a prior response, the revised Economic and Fiscal Impact Assessment indicates that some of the revenue generated by the convention center will directly accrue to the City through the Transient Accommodations Tax.
6. Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has

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been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

The SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

A proposal to relocate up to five Banyan trees in front of the convention center's grand staircase to gaps among the trees lining the Promenade was presented to the City's Exceptional Tree Committee. The proposal was denied; therefore, no trees in the Ala Wai Promenade will be relocated.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

2740 Kuilei St. #804
Honolulu, HI 96826
March 22, 1995

RECEIVED
MAR 23 1995

Mr. Gary Gill, Director
Office of Environmental Quality Control
220 South King St. Suite 400
Honolulu, HI 96813

Dear Mr. Gill:

Responses were given to my concerns during the environmental assessment and I will attempt to limit my comments here to those that remain as questions or problem areas. I understand actions to address some of them, like a traffic impact study, are underway. My concerns continue to be the social and environmental impacts on adjoining neighborhoods, especially McCully-Moiliili.

A study of impacts of redevelopment in the adjoining neighborhoods may not be required in the Draft EIS, but many lots nearby, especially up and down Kalakaua Ave. and Kapiolani Blvd., will redevelop and this will add to traffic, property tax increases, and other pressures on neighborhoods like McCully-Moiliili. The previous response that the VFW and tow yard do not have to be considered because they are private property is mistaken. Projections for increased uses on these and other properties nearby should be addressed in the EIS. If these two properties are included in "off-site improvements and utilities" it should be explained and addressed. The traffic study should be revised to consider all projects likely to be constructed in addition to the convention center.

Intensive land uses and modifications to allow resort facilities will harm adjoining neighborhoods. KPMG's projection of a need for 7,700 new daily rooms would mean redevelopment to resort uses and increased property valuations of residential property in adjoining neighborhoods. More hotel rooms are in conflict with the limits set previously by the City. A goal of the convention center is to fill existing rooms at slower times, not to build more hotel rooms.

I agree with another person's comment that the economic study did not factor in the loss of property tax to the City from the State-owned convention center.

Neighborhood Board #8 is on record opposed to peripheral parking structures in McCully-Moiliili for use by visitors and employees from Waikiki. Simply put: any intention to allow for employee and conventioner parking in McCully-Moiliili, either on-street or in structures, is unacceptable.

Many measures for traffic mitigation involve City action and this may be prohibitive due to fiscal constraints. The traffic study should not profess actions will be taken if the City's budget cannot provide them. Alternatives for traffic mitigation without City action should be included.

Responses about the Ala Wai Canal and Promenade in the Draft EIS were in agreement with my EA comments for the need for clean-up, public open space use, and attractive park-like landscaping. New questions which have arisen about the Promenade being held in a land trust should be addressed.

The child care study done in 1989 is outdated and the 2,900 new immigrant positions projected for year 2008 may justify the need for a child care site at the convention center or nearby.

I concur with the comments on the incompatibility of the Summer Palace Recreation Deck with the open parking level.

Thank you for this opportunity to comment.

Sincerely,

Nancy L. Marker

Nancy L. Marker

cc: Alan Hayashi, Convention Center Authority
Earl Matsukawa, Wilson Okamoto & Assoc., Inc. ✓



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Nancy L. Marker
2740 Kuilei Street #804
Honolulu, Hawaii 96826

Dear Ms. Marker:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 22, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The Social Impact Assessment (SIA) in the Draft EIS identified both the Veterans of Foreign Wars site and the City's Tow Yard site as "areas susceptible to change" and provided a discussion of the proposed project's neighborhood impacts in Section 4.2 (pages 48 through 65). Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. It should be noted that no off-site improvements associated with the convention center are proposed on either of these sites.

With respect to the traffic study, there is insufficient information regarding the timing and composition of what might be developed on these sites to consider a project specific traffic factor. It is assumed, however, that the development of these sites would occur after the convention center is completed in 1998. Also, as the parcels most susceptible to redevelopment in the adjacent areas are primarily located within the BMX-3 Community Business Mixed Use District zoning designation, future development could conceivably include condominiums, commercial office/retail uses, and commercial parking lots and garages, among other uses. Further, the City's Development Plan Special Provisions for the Primary Urban Center allow hotels as part of the commercial emphasis mixed-use development in the area bounded by Kapiolani Boulevard, Kalakaua Avenue, the Ala Wai Canal, the medium-density apartment designated area, Atkinson Drive,

and Mahukona Street. Nevertheless, even if we were to assume likely project compositions, the uncertainty as to actual composition and timing of such development would preclude a reasonable analysis of traffic impacts. To account for such potential redevelopment, an annual traffic growth rate of 1.5 percent per year through 1998 (which is actually higher than the City's anticipated growth rate in this area) has been factored into the analysis in the traffic study. The Final EIS will also include a traffic analysis for 2005 which takes into account further growth in the region.

2. Your interpretation about the impacts of 7,700 new daily rooms being demanded in the vicinity of the convention center is understandable. The Economic and Fiscal Impact Assessment in the Draft EIS was not as explicit as it could have been its discussion of how the demand for additional hotel rooms as a result of the convention center may be met Statewide.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

In the revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 convention days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room occupancy rates at the existing 28,414 hotel units on Oahu from 80 to 90 percent. Another 300 units would be effectively added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by

conventioners). Of the remaining 1,800 room nights, it is anticipated that visitors (other than conventioners) will continue to shift their demand to the Neighbor Islands which could be expected to absorb about 60 percent of this demand. The remaining 720 units could be met by development on Oahu, without rezoning, at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

While the demand for hotel rooms may not drive potential redevelopment, and the convention center will not be the sole cause of change to its neighborhood, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of secondary impacts such as on redevelopment and cumulative impacts such as increases in property valuations.

3. The Economic and Fiscal Impact Assessment in the Draft EIS accounted for the exemption of the convention center, as a State-owned facility, from real property taxes. This was stated as an assumption under "FISCAL IMPACTS - New Government Revenue. This assumption is also included in the revised assessment in the Final EIS.
4. There are no off-site parking structures proposed in conjunction with the development of the convention center. While it is anticipated that convention center-related parking for employees as well as event participants can be accommodated either on-site, within the 800-stall parking facility, or by shuttling event participants from existing off-site parking areas such as the Neal Blaisdell Center, there is no existing means of barring any person from using legal on-street parking. The Final EIS, however, will discuss potential measures such as neighborhood parking passes as a potential mitigation measure, although implementation of such as measure is not within the authority of the CCA.

Ms. Nancy L. Marker
July 17, 1995
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5. Mitigation measures proposed to address the traffic impacts of the convention center, as discussed in the Draft EIS traffic study, will be implemented by the design/build team and the CCA. These include physical improvements such as lane widenings and traffic signals, as well as event-related measures such as lane coning and parking restrictions. None of these measures rely upon City funding.
6. Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division (SHPD), the design of the Hawai'i Convention Center has been revised to remove any encroachment of the stairway or any portion of the convention center structure, including the planters and pond, in the Ala Wai Promenade.

The SHPD will also be considering the visual impact of the convention center structure, although it is not encroaching on the Promenade, on the historic character of the Promenade, pursuant to Section 106 of the National Historic Preservation Act. Furthermore, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

7. The "2,900 new in-migration positions" you cite was actually the Statewide total in-migrant population impact for direct, indirect and induced construction and operation employment in the year 2008, as stated in the DEIS. In the revised Economic and Fiscal Impact Assessment, this figure is attributed to the "higher attendance and spending" scenario. Of this Statewide total, total in-migration for Oahu is estimated at 1,600 persons. Of these, 895 would be associated with convention center, hotel, retail and other directly created jobs, half of whom are employees (435), the other

Ms. Nancy L. Marker
July 17, 1995
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half are dependents (435). The 727 other Oahu in-migrants are associated with indirect and induced jobs created throughout the island as an economic effect of the convention center. Due to the dispersion throughout Oahu and the State of in-migrants directly or indirectly associated with the convention center, the 2,900 person figure is not relevant to the provision of child-care facilities at the convention center.

The 1989 study was provided as a comparison between the employment created at the State's presently proposed "stand alone" convention center and the private convention center complex proposed in 1989. The previous proposal included an 800 room hotel as well as an office building, retail center and 800 condominium units, all of which would have created significantly greater employment and residential opportunities on-site and raised the question of whether or not a child care center within the complex would have been necessary. The employment projection on-site for the previous proposal was 1,910 jobs by 1997. By comparison, the current proposal projects 350 full-time equivalent permanent jobs at the convention center itself. Moreover, the current proposal has no associated residential uses for which child care needs were also considered in the 1989 study.

8. As part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may otherwise be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace condominium.

Ms. Nancy L. Marker
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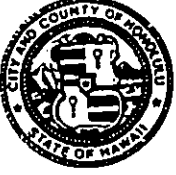
Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



ALA MOANA/KAKAAKO NEIGHBORHOOD BOARD NO. 11

c/o NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

March 21, 1995

Alan S. Hayashi
Executive Director
Convention Center Authority
841 Bishop Street Room 2222

Dear Mr. Hayashi,

The Ala Moana/Kakaako Neighborhood Board No. 11 thanks you for the invitation and opportunity to comment on the Draft Environmental Impact Statement (DEIS) prepared by Nordic/PCL Wilson Okamoto & Associates. We attempted to involve as many of our members as possible in reviewing this very impressive piece, but because we are a volunteer group, it was impossible to devote full time to our analysis and review. Nevertheless, because of the contributions of other individuals and groups we were able to exclude several segments of the total DEIS and devote full attention to a large percentage of the Statement. We found that many issues had been thoroughly explored so we needed to select only those problems not completely or, in some cases, inadequately covered by the other reviewers. These are our findings.

Socio-Economic questions:

Population - An estimated 2900 in-migrants drawn to the State by the employment needs of the Convention Center should have little impact on existing housing resources in the immediate vicinity of the Center. However, the prediction of 15,000 new visitors to Hawaii, if realized, would require 7700 new hotel rooms. This of course means more hotels. The DEIS does not speak of where these hotels would be located except to briefly mention conversion of some existing condominiums into hotel accommodations. We are aware of the probability of three new hotels being converted or built in the area: the now vacant Landmark condominium project, the Hobron site and one at the Kapiolani - Atkinson corner. The construction and operation of just these three projects will cause drastically different impacts in the area than those now delineated in the DEIS. This kind of new development should be thoroughly evaluated and its ramifications on the community added to the final EIS.

Economic impacts caused by tax inequities - These kinds of impacts are paramount and in most cases mitigation can be provided only by the State legislature, not the Center. The major difficulty is that Honolulu will actually lose money because of unreimbursable costs devolving on the City. (The Center will be owned and operated by the State. Therefore, the City will receive no property taxes from the Center and only an inequitable share of the Transient Accommodation Tax.) By the year 2008, the estimated year of operational stabilization of the Center, the State will have realized net revenues of 146 million dollars whereas the City and County will have accrued a loss of nearly 8 million dollars. The City, in order to recoup those losses, will have no recourse other than to increase its primary source of revenue: the real property tax. Even though this increased tax will be based on greater property values, the immediate effect on the already tax strangled citizens of Oahu will be close to calamitous. The State must solve this critical problem no later than 1998, the year that the City will experience a precipitate rise in costs directly attributed to services provided to the Center. (See table 4-1, page 4-13)

Public Safety - Increased demands on Public Safety resources (police, firemen, paramedics, ambulance services) will impose a heavy impact socio-economically. The fiscal obligations placed on the City by these imperatives have no current mitigation; the on site safety and security measures to be effected by the project developers are essentially cosmetic and will not relieve the City's economic crisis discussed above. The Center needs to provide a well-defined plan for all emergencies requiring in the



Oahu's Neighborhood Board System - Established 1973

premises, first response capability.

General Impacts:

Kahakai Street - The residents of Kahakai Street (and its immediate environs) will suffer the most of any neighborhood inhabitants from the loss of the *right to quiet enjoyment*. Extraordinary efforts must be set in motion before construction start up to minimize the effects of the inevitable disturbances these residents will be forced to endure particularly during the construction period. Traffic in this area is vexing at best and is one of the unresolved problems the solution for which must be attended to by the consortium to be discussed later. Other interested and expert persons have separately discussed several other traffic problems at great length and further discourse herein would be superfluous.

Parking - A dilemma that has been largely ignored. There is a need for a parking contingency plan for employee and overflow Center automobiles. The plan could provide a remote site, if necessary, with a shuttle service to the Center; the need must be acknowledged and a solution developed before the facility opens.

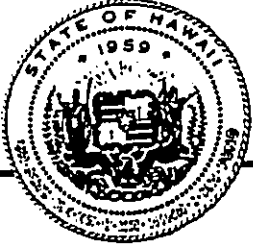
Ala Wai Canal (AWC) - The unsatisfactory condition of the AWC has no relation to the construction or operation of the HHC. The deplorable condition of the AWC can probably be attributed to the 75 years of neglect by City and State authorities. Work on the AWC promenade and banks to be performed by the HCC developer will almost certainly improve the canal over its current state. However, if water transport of conventioners on the AWC becomes a serious concept, the transport system's potential interference with AWC recreational activities must be studied and mitigation measures developed.

Conclusion - The portions of the DEIS documents reviewed in this paper were well written and easily understood. Mitigation measures recommended in the DEIS and in this critique should be specifically enumerated in the project plans. All of these corrective actions must be carefully and continually monitored. The Convention Center is a rare project, a unique public works joint venture. The joint venture nature of the project calls for the formation of a *consortium* of key leaders from the City, State, project developers, and the private sector to ensure the necessary monitoring activities continue. This collaborative effort will be essential to devising and providing integrated palliative actions for the several unresolved problems extant in the Statement. Responsibilities for prompt, feasible solutions cannot be abdicated; if we do not work cooperatively on this project, the vision of a world class convention center in Hawaii becomes fantasy.

Sincerely yours,


Raymond E. Lilly, Chair

cc: Office of Environmental Quality Control
Wilson Okamoto & Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Raymond E. Lilly
Chair
Neighborhood Board No. 11
c/o Neighborhood Commission
City Hall, Room 400
Honolulu, Hawaii 96813

Dear Mr. Lilly:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 21, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Socio-Economic Questions

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of projected economic impact estimates, with two sets of assumptions establishing a "lower attendance and spending" scenario and a "higher attendance and spending" scenario. As a result of these revisions, the projections related in-migration to the City and State now differ slightly from those you quoted from the prior assessment. The "2,900 new residents to the County and about 2,400 to the State" is now 1,600 for the County and 2,900 to the State in the "higher attendance and spending scenario" for the year 2008. For the "lower attendance and spending scenario" in the same year, the estimates are 1,400 for the County and 2,400 for the State.

It should be emphasized that the figures refer to total in-migrant population impacts for direct, indirect and induced construction and operation employment in the year 2008. Therefore, the new in-migrants would not necessarily be convention center employees, but additional employees of various hotels, restaurants, stores or other businesses within the County and State which experience increased revenues because of the convention center, as well as various employees

Mr. Raymond E. Lilly
July 17, 1995
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throughout Oahu and the State that work in areas indirectly benefiting from the convention center. The latter areas may range from protea farms on Maui supplying flowers to hotels serving conventioners to a supermarket in Mililani where a hotel worker who serves conventioners may shop. Nonetheless, we acknowledge that some additional impacts would be placed on the housing market on Oahu.

Your comment about the distribution of the projected 7,700 new daily rooms being demanded as a result of building the convention center is understandable. The Economic and Fiscal Impact Assessment in the Draft EIS was not as explicit as it could have been its discussion of how the demand for additional hotel rooms as a result of the convention center may be met Statewide. In the revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 conventioner days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room occupancy rates at the existing 28,414 hotel units on Oahu from 80 to 90 percent. Another 300 units would be effectively added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it is anticipated that visitors (other than conventioners) will continue to shift their demand to the Neighbor Islands which could be expected to absorb about 60 percent of this demand. The remaining 720 units could be met by development on Oahu, without rezoning, at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

The Social Impact Assessment (SIA) in the Draft EIS acknowledges that the project may stimulate development of the Hobron area and the Kapiolani-Atkinson corner, and these sites are identified on pages 51 and 52 of the report. Further, Table 9 identifies the potential impacts on the existing neighborhood, should these areas be redeveloped. Based on comments received on the Draft EIS, the SIA was revised to

Mr. Raymond E. Lilly
July 17, 1995
Page 3

include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Regarding the Landmark site, the conversion of these units to visitor use is speculative. This possibility was not mentioned in interviews conducted in conjunction with the preparation of the SIA, including the interview with a person affiliated with the landowner of the Landmark site.

Finally, it should be noted that if any hotel development is proposed in Waikiki, extensive environmental studies would be required by the Hawaii EIS Law. Proposed hotels in the Ala Moana and Kapiolani Boulevard area would be scrutinized through a required rezoning process to allow such as use.

Economic Impacts Caused by Tax Inequities

Your comments regarding the inequitable distribution of tax revenues derived from the convention center between the City and State are well taken, and your opinion regarding its implications are acknowledged. The Economic and Fiscal impact assessment in the Draft EIS indicated that the City will be incurring costs such as for police and fire protection as well as other City services for an increased population that may result from the in-migration of people attracted by direct, indirect, and induced employment created by the convention center. It further indicated that the tax revenues derived as a result of increased visitor industry activity generated by the convention center will accrue primarily to the State, at least in the near term. Hence, the fiscal impact to the City was shown to be as much as \$2 to \$3 million in the negative from 1998 to 2003 before turning positive in 2008 at \$400,000. Under this scenario it is conceivable that the City would seek to recoup its losses through property tax increases.

Based on comments received on the Draft EIS, however, the economic and fiscal impact assessment in the Final EIS has been revised. One of the revisions is the assumption regarding distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's share of the statewide TAT collection could range from \$7.3 to \$8.9 million in the revised 2008 projection. The County's net additional revenue projection in 2008 is also positive, ranging from \$3.6 to \$5.4 million. As in the case

Mr. Raymond E. Lilly
July 17, 1995
Page 4

of the prior study, both the State and the County incur a negative fiscal impact during construction of the Center, before its economic benefits can be realized. These losses are more than compensated, however, when the Center becomes operational.

Public Safety

You are correct that the fire safety and security measures accommodated in the convention center design and as envisioned for its operation are no substitute for the services offered by the City's fire, police, ambulance, and civil defense services. For example, while the center's design meets all fire safety codes, it will rely upon the City's fire fighting capabilities in the event of a fire. Similarly, the center will have a security system and personnel as well as first-aid facilities and civil defense equipment, but all of these are intended to supplement, complement or enhance the provision of basic city services at the center.

Kahakai Street

The Draft EIS identifies the various construction-related impacts on residents in the vicinity of the convention center site, particularly those in the Kahakai Drive area. While various proposed mitigation measures will reduce the intensity of impacts, complete mitigation, particularly of noise, will not be achieved.

Parking

Parking within the convention center is designed to accommodate offshore convention events where most of the delegates would be transported to the site by buses. The Blaisdell Center will remain the primary venue for local events which would create a greater demand for parking. Ongoing improvements to the Blaisdell Center were funded in the amount of \$13 million by the State specifically to better accommodate local trade-shows and other large local events. Moreover, it is not the intent of the convention center to take business away from hotels with ballroom facilities accommodating smaller conventions, and local events such as wedding receptions. Thus, local events at the convention center are anticipated to be infrequent and the proposed 800-stall parking garage at the convention center will be adequate for most events held there.

Mr. Raymond E. Lilly
July 17, 1995
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To the extent that the convention center parking garage cannot accommodate parking for large local events that are held there, event organizers will be required to arrange for off-site parking and for shuttling-in their guests. It is acknowledged that there may be events that would have a higher proportion of local resident attendees driving to the convention center, or would require additional temporary and part-time employees, or trade show exhibitors who may require special parking needs. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include use of existing outlying parking facilities that may be available during the event; arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking; and, issuance of public bus passes to convention center employees.

Ala Wai Canal

Based on comments received on the Draft EIS, as well as discussions with the State Historic Preservation Division, the design of the Hawai'i Convention Center has been revised to remove any encroachment of the convention center structure onto the historic Ala Wai Canal Promenade. Although some improvements such as walkways will extend onto the Promenade, there will be no construction affecting the historic Ala Wai Canal walls. Facilities for water transportation are not proposed, however it is acknowledged that if such facilities were to be proposed in the future, potential conflicts with existing recreational use of the canal must be considered.

Consortium of Agencies

The CCA acknowledges that the successful operation of the Hawai'i Convention Center will require the coordination of services offered by a number of City and State agencies. To a large degree, this need is being met by the design of the Center, which has or will be scrutinized by many agencies, such as the Department of Transportation Services, Fire Department, Building Department, Wastewater Department and the Board of Water Supply. The EIS process is also integral to soliciting the input of various agencies to assure that their concerns are addressed. The CCA intends to keep the lines of communication open in addressing future concerns that will

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inevitably arise as this project moves through construction and into the operational phase.

Your comment letter was accompanied by an attachment that appears to be an analysis of the Draft EIS. Inasmuch as the areas of concern reflected in this analysis appear to have been incorporated in your comment letter, we did not prepare a point-by-point response to this attachment.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



**W A I K I K I
I M P R O V E M E N T
A S S O C I A T I O N**

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S. Terry Wells
President

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Robert R. Midkiff
 Consultant

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 MAR 30 1995

March 23, 1995

WILSON, DAMON & ASSOCIATES

MAR 27 1995

Leslie Kurisaki
 Senior Associate
 Helber Hastert & Fee, Planners
 Grosvenor Center, Makai Tower
 733 Bishop Street, Suite 2590
 Honolulu, HI. 96813

Dear Ms. Kurisaki,

Thank you very much for the opportunity to comment on the draft Environmental Impact Statement for the Hawai'i Convention Center being developed at the intersection of Kalakaua Avenue and Atkinson Drive. Our comments focus on transportation-related issues.

Before discussing those issues in detail, however, we would like to make the general statement that the convention center must be seen as an integral part of Waikiki -- its Master Plan and its rebuilding. If Waikiki is to continue to be a premier visitor destination, it will need to be the recipient of both private and governmental investment. The convention center can play an important part in achieving this goal.

The Waikiki Improvement Association feels that physical impacts caused by the convention center on surrounding neighborhoods and Waikiki itself should be mitigated as part of the convention center project. This might include improving sidewalks, developing pedestrian bridges, and/or improving the pedestrian promenade along the Ala Wai Canal. A regional traffic impact study is also underway by the city and should be a part of ongoing convention center planning.

The following points are for your consideration:

- **Shuttle Bus Use:**

To a large extent, the traffic impacts generated by the convention center would be directly related to the flow of shuttle buses to and from the convention center. It appears that the projected use of shuttle buses is optimistically efficient. The loading factors of 49 passengers per bus seems to be high compared to personal observations at other conventions attended around the country. Thirty-second headways at the convention center drop off requiring only six bus stalls also seem to be out of line with reality. It is hard to imagine a bus stopping, unloading and loading 49 passengers within a 30-second window. (This also includes exiting from the drop off area.) All it would take is a delay of a

few seconds to cause other buses to back up on surrounding streets and seriously impact traffic flows. This likelihood is exacerbated when it appears from the site plan that taxi cab arrivals, during the a.m. peak, will likely conflict with bus movements.

- **Pedestrian Movement:**

We appreciate the recognition that pedestrian movement can be an important aspect in alleviating transportation impacts generated by the convention center. However, for that movement to be successful, pedestrian pathways must be clearly apparent and efficient and in addition must represent visual and intriguing experiences to the visitors. Pathways that have these characteristics will encourage pedestrian movement and make a long pedestrian walk appear short. It is with this in mind that pathways leading to the convention center must be upgraded and enhanced so that the movement is an enjoyable one.

A technical question we have about the analysis of pedestrian travel is that there appears to be a discrepancy between a convention having 10,000 participants versus one having 14,000. We are curious why a 10,000-member convention would generate 2,128 walking trips, while a 14,000-member convention would apparently generate only 850 walking trips. It would appear that both conventions would generate the same number of walking trips given the likelihood that the same nearby hotels would be used.

- **Pedestrian Bridge:**

One possible mitigating measure for facilitating pedestrian traffic across the Ala Wai Canal would be to build a pedestrian bridge at the makai end of the convention center at Lipeepee Street. We would like to see some further discussion of this concept with a study of a possibility of combining this bridge with a major shuttle drop off located on the opposite side of the Ala Wai Canal. In this way, the main entrance and orientation of the convention center would be to the Ala Wai Canal, away from the noise and congestion of Atkinson Drive, Kapiolani Boulevard and Kalakaua Avenue. This would give the visitor, whether walking or taking a shuttle bus, a convention entrance that is both exciting and a beautiful experience.

- **Future Rapid Transit Alignment:**

The Waikiki Improvement Association is very disappointed that there is no provision for the future development of a rapid transit line to serve the convention center and surrounding areas. While the concept of a rapid transit system has gone through many evolutions, all alignments have identified this site as an important station facility. If Honolulu intends to move into the 21st Century as a major urban center in the Pacific Basin, it must have the infrastructure to do so. It is imperative that we look to the future to plan projects such as the convention center to incorporate at a future date a station facility having the least disruption to the surrounding area and convention center itself.

- **Level of Service Factors:**

We would be interested to understand why the level of service (LOS) does not seem to appreciably deteriorate between a 10,000-person convention and a 14,000-person convention. Our question reflects not only the greater number of attendees to the convention but also the greater percentage of attendees who would be using shuttle buses. At the same time, the EIS statement shows that the Kapiolani Boulevard/Kalakaua Avenue intersection would deteriorate from an existing LOS D to an LOS E if the convention center were not built and only normal growth of traffic occurred in the area.

- **Regional Impacts:**

Waikiki Improvement Association supports transportation solutions for all constituencies in Waikiki -- residents, employees and visitors. We feel that the EIS needs to take into consideration the movements of residents and employees in and out of Waikiki when added to the movements of conventioners. In this regard, the findings of the City's Regional Traffic Impact Plan will be an important correlation to the EIS and will need to be considered.

- **Quality of Life Factors:**

WIA is interested in improving the quality of life for residents around the convention center as they deal with added traffic and noise, servicing, events on rooftops and steps and other activities generated by the facility. WIA feels that the EIS needs to be sensitive to such resident issues and address possible mitigation measures.

We at the Waikiki Improvement Association have tried to avoid technical issues of the transportation elements of the subject EIS, leaving those to others to address. Rather, we have tried to focus on those issues relating to the pedestrian environment and long range transportation planning that are important to the redevelopment of Waikiki. In particular, this means making Waikiki an enjoyable pedestrian environment and one that relates to the island wide community through an efficient rapid transit system.

Thank you for this opportunity to comment on the draft EIS.

With aloha,



Terry Wells
President

cc: Alan Hayashi, Executive Director
Convention Center Authority



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Terry Wells
President
Waikiki Improvement Association
2270 Kalakaua Avenue, Suite 1700
Honolulu, Hawaii 96815

Dear Ms. Wells:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 to Ms. Leslie Kurisaki of Helber Hastert & Fee, Planners commenting on the subject Draft EIS.

We agree that the convention center must be seen as an integral part of Waikiki, both in its master plan and its rebuilding. We acknowledge your comment that if Waikiki is to continue to be a premier visitor destination, it will need to be the recipient of both private and governmental investment. We further acknowledge that the convention center can play an important part in achieving this goal.

To the extent feasible, the convention center will mitigate most physical impacts resulting from both construction and operation of the Center. The provision of mitigation measures you identify, such as improving sidewalks, developing pedestrian bridges, and/or improving the pedestrian promenade along the Ala Wai Canal, and consideration of the Waikiki Regional Traffic Impact Plan, are discussed in detail below as responses to your specific comments, respectively:

Shuttle Bus Use:

The assumptions and guidelines used in the shuttle bus operations analysis for the EIS traffic study were established in consultation with convention transportation planner S.E.A.T. Planners, Incorporated of San Diego, California. S.E.A.T. Planners' extensive experience with conventions nationwide indicates that an average passenger load per shuttle bus approximating the capacity of the total number of buses required for an event is achievable. Based upon the current private bus fleets, the large tour coaches can

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accommodate a capacity of 49 or more seated passengers. The shuttle bus analysis is based on an average passenger load of 49 persons per bus, which approximates the lowest seated capacity of the large charter coaches, which range in size from 49 to 65 seats, with 54 seats being the most common size. The shuttle bus operator is expected to maximize use of the buses during the peak arrival/departure hours. Also, the costs incurred by shuttle bus operators are attributed to labor or bus drivers, rather than the size of vehicles. Therefore, it would be more cost-effective for the shuttle bus operator to obtain maximum passenger capacity in a large-size bus than to conduct an operation using smaller buses. There may be occasions, however, whereby some shuttle buses may operate at less than capacity passenger seated loads. To transport the estimated number of convention attendees, other shuttle buses would accommodate standing passengers to compensate for the less than full buses.

We would like to clarify that the 30-second headway is the average time between the arrival of successive shuttle buses, and not the window for passenger unloading/loading operations. The "dwell time" is the total time that a bus is stopped to service passengers. Based on the traffic industry's standard estimates, it takes an average of 2.0 seconds per alighting (disembarking) passenger and 3.0 seconds per boarding passenger per shuttle bus. The traffic industry standards apply a percentage increase factor to the dwell time to account for variations in dwell time, as well as the clearance interval between buses and the arrival rate of buses. Based on these factors, the total "average" dwell time for a capacity 49-passenger shuttle bus is 2 minutes 30 seconds for unloading operations, and 3 minutes 30 seconds for loading operations.

According to the EIS traffic study, for a 14,000-person convention, the six bus berths provided at the main entry drive fronting the convention center lobby should be adequate to accommodate the shuttle bus operations and number of bus trips during the heavier AM peak hour under normal conditions. During the PM peak hour, the six bus berths fronting the lobby would more than accommodate anticipated bus loading demands. Also, the two additional bus berths along the proposed widened portion of Atkinson Drive fronting the project site would be used as reserved bus berths should the six berths fronting the lobby be fully occupied. Furthermore, if necessary, up to

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20 shuttle buses can be staged within the truck dock area located entirely within the convention center site.

Regarding your concern that taxi cab arrivals will likely conflict with bus movements during the AM peak hour, please be apprised that traffic control personnel would be stationed at the main entry drive area to direct traffic and maintain pedestrian safety. In addition to the six taxi/passenger vehicle drop-off/pick-up spaces in the lobby area, another passenger drop-off/pick-up area for taxis and private and rental vehicles will be provided within the parking garage of the convention center.

Pedestrian Movement:

We agree that clear, visual characteristics of pedestrian walkways encourage pedestrian movement. The sidewalks constructed along the convention center fronting the major streets will be landscaped with plants appropriate to the convention center design. For example, along the Kalakaua Avenue project frontage, a five-foot high berm along the base of the convention center building will be landscaped with mature Coconut palms, Halas, Plumerias, shrub and Laua'e Fern, and the rebuilt sidewalk will meander through this bermed area away from the street.

Regarding the pedestrian Promenade along the Ala Wai Canal, the SHPD will be considering the impact of paved walkways, lighting, landscaping, and street furniture extending from the stairway onto the Promenade. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

The difference in the number of walk trips generated between the 10,000-person event and the 14,000-person event is attributed to the different walk mode splits used in the analyses. The walk mode splits can vary significantly from event to event, depending on weather conditions, average age/mobility of conventioners, frequency of shuttle buses, etc. Different splits were used in the analyses to test the

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impacts on the pedestrian and vehicular systems. A 35 percent walk mode split was established for the 10,000-person event, while a 10 percent walk mode split was used for the 14,000-person event. The reduction in the cumulative percentage of walk trips for the 14,000-person convention from the 10,000-person convention is intended to provide a more conservative basis for assessing a "worst-case" traffic situation.

The walk mode split would have some relationship to the size of the event, but is based on the acceptable walking time and the number of hotel rooms located within that walking distance. The walk mode split for the 10,000-person convention is based upon the 15-minute walking distance established by a 1989 survey (modified to include the Hawaii Prince Hotel) which grouped the inventory of hotels and short-term rental condominium units by walking distance to the convention center site. Under the 14,000-person convention, a more conservative analysis was conducted using the 10-minute walking distance to establish the walk mode split. In general, conventioners would most likely walk to destinations located within a 10-minute range.

Pedestrian Bridge:

Based on the analysis of pedestrian access in the EIS traffic study, construction of a pedestrian bridge across the Ala Wai Canal is not required to mitigate anticipated convention center pedestrian impacts. We do agree, however, that a future pedestrian bridge at Lipeepe Street could provide better access to the convention center for walkers. Such a bridge would be pursued as a separate action and be subject to the historic sites review process and the provisions of Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) due to its impact on the Ala Wai Canal.

Although the Waikiki end of a pedestrian bridge over the Ala Wai Canal could serve as an alternative drop-off point for shuttle buses and pedestrian route for accessing the convention center, the addition of these buses in the Hobron Lane residential area may not be well received. Also, improvements would need to be provided to implement such an option (i.e., provision of designated bus bays on Ala Wai Boulevard) and would incur additional costs, as well as potentially impact the adjacent residences in the area (i.e., potential elimination of a number of on-street parking spaces to accommodate the required bus bays). On the other hand, the

Ms. Terry Wells
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convention center is designed to accommodate the shuttle bus loading/unloading area along the Atkinson Drive/Kapiolani Boulevard frontage, away from residences.

Future Rapid Transit Alignment:

We acknowledge the disappointment of the Waikiki Improvement Association that there is no provision for the future development of a rapid transit line to serve the convention center and surrounding areas. We further acknowledge that a rapid transit station in the vicinity of the project site could improve resident access to the center and reduce vehicle trips. However, Waikiki visitor access to the convention center would require the construction of a Waikiki transit line.

The convention center EIS recognizes that the City's Development Plan Public Facilities Map for the Primary Urban Center reflects a rapid transit alignment and station on the convention center property. Development of the regional rapid transit system, however, has largely ceased due to the absence of a dedicated local funding source. Therefore, the convention center request for proposals did not require that a rapid transit station be included in the design proposals. The current convention center design precludes any alignment straight across the site, but could accommodate a future alignment located along its periphery. The convention center design would also preclude future location of a transit station at the project site.

Level of Service Factors:

The increase in traffic attributable to the convention center (which includes shuttle buses, taxis, private vehicles, rental cars, etc.) is relatively small when compared with the background traffic in the vicinity (i.e., during the AM peak hour at the intersection of Kalakaua Avenue/Kapiolani Boulevard, traffic increases by 4 percent during the 10,000-person convention and by 7 percent during the 14,000-person convention). The relative 3 percent increase between the 10,000- and 14,000-person conventions does not necessarily affect the level of service (LOS) in the project vicinity. We acknowledge that the EIS shows that the Kapiolani Boulevard/Kalakaua Avenue intersection would deteriorate from an existing LOS D to LOS E if the convention center were not built and only normal growth of traffic occurred in the area.

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Without the convention center, the proposed lane widenings would not be provided. Thus, with the increase in background traffic, the LOS would deteriorate. The lane widenings with the convention center offsets the increase in traffic associated with the convention center.

Regional Impacts:

The EIS traffic study accounts for existing and future volumes of traffic travelling to and from Waikiki within the project's established study area. To account for future traffic growth, an annual traffic growth rate of 1.5 percent per year through 1998 has been factored into the traffic study analysis. Based on this analysis, the EIS traffic study identifies a number of planned roadway improvements and recommended operational traffic improvements to mitigate the convention center traffic impacts. The Waikiki Regional Traffic Impact Plan is intended to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). The State Convention Center Authority (CCA) has participated in a number of meetings with the City Department of Transportation Services regarding the two studies, wherein it was agreed that the City would incorporate the traffic data from the convention center's traffic study into its regional study. Further, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

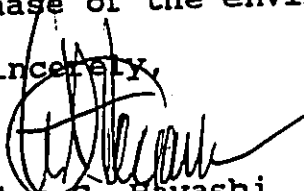
Quality of Life Factors:

We are extremely sensitive to the needs and concerns of the residents in the vicinity of the convention center site. However, having enjoyed living with an approximately 10-acre vacant lot for the last seven years, it is unlikely that any significant development on the site, even with extensive mitigation, could completely restore, much less improve upon conditions such as ambient noise, air quality, traffic and the overall presence of people in the area as it is today. The Draft EIS has endeavored to identify all potential impacts of concern to nearby residents and, to the extent feasible, indicated the nature and magnitude of those impacts and potential mitigation measures. Issues such as traffic, public services and noise have been addressed in the Draft EIS.

Ms. Terry Wells
July 17, 1995
Page 7

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Waikiki Tenants Association

2446-A Cleghorn Street • Honolulu, Hawaii 96815

Information & Referral: 922-4067/Fax: 924-3945

March 14, 1995

Alan S. Hayashi, Executive Director
Convention Center Authority, State of Hawaii
841 Bishop Street, Rm. 222
Honolulu, Hawaii 96813

re: Community impacts as covered in the DEIS -
Community Organization Comments

Dear Mr. Hayashi & Members of the Convention Center Authority:

First, and most emphatically, we feel that the DEIS does not come to grips with the community impacts, nor sufficiently mitigate them in a few areas.

1.) **TRAFFIC:** The mitigation mechanisms and solutions we feel are not nearly substantial enough to meet many complex situations which are possible and known to anyone who lives or works or owns a business in Waikiki. A myriad of groups other than residents, attend Waikiki regularly and must be understood fully to assess the impacts here.

a.) Both residents and travelers to the Kahakai Drive area adjacent to the site, are rightly concerned for their ability to access their homes, go to work and return, and park. The measures of roadwidening and special areas for tour bus arrivals do not allow for all the variables possible in the area and are not sufficient to meet the complexity of this BOTTLE-NECK area at the gateway to Waikiki (and in addition, one entry area to Ala Moana Shopping Center). The convergence of people and vehicles to this area will usually be greater than we feel the DEIS has addressed. Perhaps further study of that convergence needs to be done. And extensive data about the actual use of the adjacent areas. We feel it has not been sufficient from all we have heard thus far.

b.) Many of our members have reported that what overloads our bus system is tourists, and some of those are conventioners. The Convention Center will bring many more, and what we have now is a shortage of buses in Waikiki, so overloaded that many people are left at bus stops every day. Therefore, we feel some thinking must be applied to what to do about traffic impacts that are not covered in the tour and private busload estimates. Waikiki is a city within a city, and perhaps the densest part of the urban core. It must be viewed as such in any planning effort.

2.) **HOUSING AND THE COMMUNITY:** All surrounding areas to the convention center site, and specifically, the Ala Wai Gateway (Hobron block) are vulnerable to severe impacts upon the community, and its housing stock for employees, elderly retired

and semi-retired, disabled, and others. The Hobron block alone represents about 1,000 renters; the housing for them would not be replaced at the site. Across the street from this block is yet another area surrounding the Hobron Outrigger Hotel, filled with a variety of housing options, which would clearly be impacted by any development at the Hobron block. Our concern as an organization is obviously for the well-being of the community; the very urgent concern for replacing housing, and what can be done to mitigate such disruption and hardship that may be experienced by many, many residents.

With the passage of Act 159, it is clear that a situation wherein the Authority initiates condemnation at Hobron is at least a real possibility, and that would have still further and greater impacts on the homeowners of the Hobron block that would be very hard to justify, in our view, in the guise of "benefits to the community".

We appreciate your consideration of these initial comments from our leadership and steering committee, but we may receive other comments from members before the 25th deadline, and if so we will forward those to you as well, by your deadline.

Sincerely,



Briana Pilon
Executive Director
Waikiki Tenants Association

Apr 04.0> 21:38 P.01

TEL NO.

Waikiki Tenants Association

2446-A Cleghorn Street • Honolulu, Hawaii 96815

Information & Referral: 922-4067/Fax: 924-3945

March 21, 1995

Alan Hayashi, Executive Director
Convention Center Authority, State of Hawaii
841 Bishop Street, Room # 222
Honolulu, Hawaii 96813

RECEIVED
MAR 24 1995

WILSON OKAMOTO & ASSOC. INC.

Dear Mr. Hayashi, & Members of the Convention Center Authority

As we mentioned in our initial letter of comment, here are some additional comments that have been logged by members of WTA in response to the Draft EIS, and recent public meetings on it:

1.) The issue of carrying capacity has not to date been addressed in a comprehensive manner anywhere. There was a study in progress, but of course its results not incorporated into any mitigation projections as it's not complete or publicly disclosed. Although the carrying capacity of the "stand-alone" center may have been addressed, it sort of begs the question that there will be immediate impacts on development in adjacent areas to the site, as well as nearby at Hobron, and although it may be within the "letter of the law" to merely address the carrying capacity of the Convention Center itself, it is a mystery to no one that development will mushroom all around the Center area and beyond.

It seems to many members in the community that a COMPREHENSIVE planning study/effort for the following has not yet been initiated, and yet would only be good planning for something as important as the future of Waikiki and the Convention Center: Infrastructure status and requirements for the Gateway to Waikiki, traffic study incorporating all Waikiki-related traffic patterns that would play into the convergence of traffic to any part of Waikiki (including freeway connections).

2.) Again, the issue of housing loss and impacts came up with our members at last night's meeting, and all felt this is not yet being sufficiently addressed, or even discussed realistically.

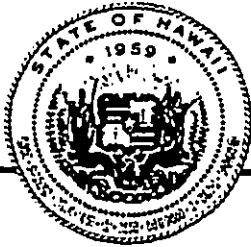
3.) After reviewing DEIS emergency, police and disaster discussions we feel this area has to be more closely scrutinized by the DEIS process, especially in light of the fact that the Gateway area is already a problem area, and this is perhaps the most immediate and life-threatening of mitigation situations.

Thank you for this opportunity to register our responses and comments.

Sincerely,



Briana Poillon
Executive Director



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Briana Poilon
Executive Director
Waikiki Tenants Association
2446-A Cleghorn Street
Honolulu, Hawaii 96815

Dear Ms. Poilon:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letters dated March 14 and March 21, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Letter of March 14, 1995

1. Traffic

The analysis methods employed in the Draft EIS traffic study are generally accepted by traffic engineers. Based on comments received on the Draft EIS, a confirmation of traffic impacts of additional intersections in the project area will be conducted as well as one that looks further into the future to the year 2005 to determine how changes in non-convention center generated traffic may affect intersections in the vicinity.

- a. Traffic studies are intended to assess daily or otherwise recurring traffic conditions. Because convention events do not occur on a daily basis, the traffic study examined the largest anticipated events. For example, the 14,000-person events are projected to occur once in three years. While we acknowledge your concern about the access of residents in the area, the additional studies that we have prepared in response to comments expressed by reviewers substantiates our earlier findings.
- b. The analysis of Oahu visitor conventioners on TheBus services (Route 2 and combined Route 2/Ala Moana Boulevard) in the EIS traffic study indicates that TheBus could not accommodate the additional

Ms. Briana Poilon
July 17, 1995
Page 2

riders without adding more bus capacity, either more vehicles, or use of higher-capacity articulated buses. Accordingly, the EIS traffic study recommends that mid-size and large conventions should stress the use of special convention shuttle services, and that a convenient system of shuttle buses should be provided between the hotels and the convention center. Convention literature should promote use of such systems. The traffic study also considers the City's proposed Waikiki people mover system as a potential long-range alternative to augmenting public transit capacity between Waikiki and the convention center.

2. The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas susceptible to redevelopment in the vicinity, including the Hobron block. Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents and provide assistance to displaced persons. It should be noted, however, that efforts to redevelop the block have proceeded independent of efforts to develop the convention center. Development of the convention center may have the cumulative impact of speeding-up redevelopment of the block but is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS.

While we acknowledge your concern for the well-being of existing tenants in the area, current laws allow the State only limited control over private parcels which may redevelop. On the other hand, if the State were to acquire land through condemnation as you suggest might occur, then it is bound by laws for resident relocation that are more stringent than for private developers. At this time, no such condemnation is being considered.

Ms. Briana Pailon
July 17, 1995
Page 3

Letter of March 21, 1995

1. We are unaware of any "carrying capacity" study being conducted in the vicinity of the convention center. Also, the EIS Law does not require a "carrying capacity" study, at least in the usual sense that the term has been traditionally applied. The Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas susceptible to redevelopment in the vicinity.

Comprehensive planning efforts for Waikiki were undertaken by the City in its 1992 Waikiki Master Plan, which is currently being updated. This plan indicated the development of a convention center at the Aloha Motors site. The City has also undertaken the Waikiki Regional Traffic Impact Plan which includes traffic generated by the proposed convention center. The City's East Mamala Bay Facilities Plan addresses wastewater collection, treatment and disposal for Honolulu from East Hawaii to the Halawa area.

2. As discussed previously, the loss of housing is a potential cumulative impact of convention center development, and the actual role the convention center may have in spurring redevelopment is uncertain. Inasmuch as any redevelopment in Waikiki would be subject to the State's EIS law, it is likely that a major redevelopment effort such as at the Hobron block will require an EIS. That EIS would need to examine the direct impacts on housing of specific projects and would do so much more specifically than is possible at this time.
3. Your comments on impacts related to emergency, police and disaster do not specify what concerns you have. If it is in regard to access by various emergency vehicles, the Draft EIS traffic study discusses how the traffic impacts of the convention center are mitigated such that conditions would not be significantly worse than if it were not developed. In other words, the impacts of the convention center on access by emergency vehicles would be mitigated by the proposed traffic improvements.

Ms. Briana Pailon
July 17, 1995
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Your letters, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

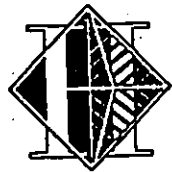
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER NINE

CONDOMINIUM ASSOCIATION BOARDS
Comments Received and Responses



Hawai'i Convention Center

sevenbeen sevenbeen  ala wai
HONOLULU, HAWAII 96813

March 25, 1995

Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, Hawaii 96813
ATTN: Alan S. Hayashi

RECEIVED
MAR 28 1995

Dear Mr. Hayashi:

We thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the proposed Hawai'i Convention Center.

The residents of 1717 Ala Wai, the residential condominium located directly across the Ala Wai Canal from the proposed Convention Center site, are deeply concerned about the grossly inadequate and incorrect information presented especially in the areas of TRAFFIC, PARKING, and NOISE. We are also alerting the State and City to the danger and legal problems that could arise from proceeding on this false basis.

1. Traffic Problems

The traffic study included in the DEIS is entirely inadequate. The congestion around the convention center at the peak periods in the morning, and evening will actually strangle Waikiki. Getting through the Kapiolani and Kalakaua intersection now in the P.M. peak period sometimes takes up to three traffic light changes - at about 50 seconds each - considerably longer than the 25.8 seconds delay promised in the DEIS. Traffic backs up several blocks on both Kalakaua and Kapiolani during heavy traffic times. Many weekend evenings, and especially during holiday times we can see a solid mass of cars on Kalakaua from King Street all the way into Waikiki. While we realize that the additional rental cars, service personnel vehicles, buses, and delivery trucks added to these streets will not always be converging, still most will be arriving and/or departing at or near peak traffic times.

Two problems relating to traffic not considered in the DEIS are:

The Kalakaua Ala Wai bridge is on the National Register of Historic Places. The Canal and its Promenade are in the process of being listed there. All three are already on the State Register. Any encroaching or remodelling, even if there was State money to do it, would be extremely difficult. The suggestion of adding a new pedestrian bridge into Lipeepe Street or a new lane of traffic on Kalakaua from Kapiolani to dead-end at the bridge are essentially dead-end propositions.

The traffic in prostitution and crime will find enticement to expand its base from central Waikiki to this Center area, greatly increasing the negative impact to our residential neighborhood.

Convention Center Comments
March 25, 1995
Page Two

The calculation given for bus trips in the morning peak hour with a 10,000 person Convention works out to over 60 bus trips per hour with busloads of 45 to 65 people. The possibility of getting 60 buses to each discharge 50 people and vacate the stop for the next bus in one minute as claimed in the DEIS must be a time measure for a convention of Power Rangers but certainly not for the average conventioner. 4 - 5 minutes is a more reasonable average, and if the buses double park to let passengers out, that bus stop time is extended. The drop-off driveway allows for 6 buses at one time so the remaining loaded buses wait their turn on Atkinson and there could be a que of buses as far back as the Ala Moana Ala Wai bridge!

For the 10,000 person convention, the projection is that 2,126 of the morning attendees will walk. If it is raining, these people are going to require bus transportation, approximately another 48 buses adding to that que of buses over the Ala Moana bridge. In either case a good percentage of visitors would have to leave their hotels two hours early or arrive late for their meetings. Is this what a world class facility is all about? Will the convention planners want to return to this Hawaiian version of 'world class' conventioning?

Of course, on a beautiful Hawaiian day these 2000-plus conventioners will want to walk to the Center....during heavy traffic hours....and pedestrians 'en masse' are not as disciplined by crosswalks and traffic lights as they are as individuals. Sidewalk gridlock as well as street tie-ups could block residents from going in or out of their home. The great potential for accidents can't be dismissed. The State will have a strong liability for allowing such disastrous planning.

Emergency vehicles could be dangerously delayed as they come on their route down the Kalakaua or Kapiolani corridors, with the near gridlock of vehicles and pedestrians that will be caused by the Convention Center traffic. Is there any provision in the law or the planning to take care of liability claims made against the City and State for undue damage to life and property that are caused by an emergency vehicle being unable to proceed in such traffic conditions?

2. Parking Problems

How can we call this a 'world class' Center with only 800 on-site parking spaces? Limited parking makes this less 'world class' than Blaisdale Center which is smaller but has a parking capacity of 1200 cars. Local events are limited by parking to 1800 persons but there would certainly be times when larger local attendance would be desirable, ie. political rallies, charity benefits, etc. If that larger gathering were allowed the traffic impact would be unbelievably severe. If the 1800 limit were held to, then Hawaiian citizens, and especially those in this neighborhood are BIG losers, being subject to the tyranny of having to pay taxes for a complex we can't use effectively AND having our property values decline from the negative impact of the problems discussed here.

Convention Center Comments
March 25, 1995
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The proposal for mitigating parking - or traffic flow - by controlling parking on neighborhood streets is totally unacceptable as it means displacing cars of local residents who must of necessity use on-street parking.

3. Noise Problems

The DEIS gives short shrift to any attempt to mitigate noise that will be created by large delivery trucks and vans jockeying for space to unload, 800 cars and 60-80 buses entering and leaving, and the inevitable noise generated by hugh gatherings of people. The Architect of the Convention project eulogized early on that in this 'Hawaiian sense of place' the open spaces would be filled with the sounds of birds and waterfalls! The normal, ambient traffic noise of 70 db would be flowing through those open spaces masking even the loudest 40 db birdsong.

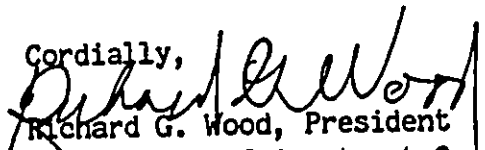
The open, roof-top lanai, so important in the plan to give an 'Hawaiian sense of place' will have 105 thousand square feet, accomodating close to 10,000 people. The DEIS claims this will generate 68 bd of noise and that the P.A. system would have to be set well above that, to 80-90 db to be useful. At that strength it not only exceeds the legal noise limit but ALL the surrounding thousands of families would be unavoidably subjected to those rooftop activities. A class action suit against the State because of the noise impact on the neighborhood is not beyond the realm of reality.

If this incorrect and incomplete report of the impact of the Convention Center on this neighborhood had been correctly written, especially in the areas of TRAFFIC, PARKING, and NOISE, it would be patently apparent that the project is totally unacceptable for this Kapiolani-Kalakaua corner, reputed to be the busiest traffic intersection in the State.

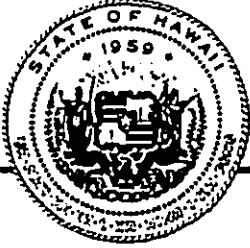
The Architect's plan is attractive but should be built in an area where it will have no adverse residential impact, where there is room to expand to its proper potential, and where the surroundings can TRULY give an Hawaiian sense of place.

We are hereby notifying you, both the State and City, that should access to our property be restricted or should we suffer undue nuisance by the manner and means of the convention center project, we, the residents at 1717, reserve the right to pursue legal action for damages resulting from the inverse condemnation of our property.

Cordially,


Richard G. Wood, President
Association of Apartment Owners
at 1717 Ala Wai

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Richard G. Wood
President
Association of Apartment Owners at 1717 Ala Wai
1717 Ala Wai
Honolulu, Hawaii 96815

Dear Mr. Wood:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 25, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. Traffic Problems

We disagree that the EIS traffic study is inadequate. As demonstrated in the traffic study, among the most important project mitigation measure is the provision of an additional lane of traffic along Kalakaua Avenue and Kapiolani Boulevard, an additional lane along Atkinson Drive, and two (2) additional traffic lanes along Kahakai Drive to accommodate convention center traffic. All of these road widenings will be on the convention center property and, in combination, will offset the impacts of traffic created by major events at the convention center coinciding with peak traffic hours.

Also, due in part to the PM peak traffic period-turn restrictions on maukabound Kalakaua Avenue at Kapiolani Boulevard and on westbound Kapiolani Boulevard at Atkinson Drive, Oahu visitor conventioners from Waikiki hotels arriving by shuttle bus, as well as those arriving via automobiles, will be instructed to approach the convention center from westbound Ala Moana Boulevard and right-turn onto Atkinson Drive. By recommending that all Oahu visitor conventioners follow this route to the convention center, conventioner traffic at the intersection of Kapiolani Boulevard and Kalakaua Avenue during the AM peak period would be minimized. We also wish to clarify that delivery trucks are not anticipated to arrive or depart from the convention center during the morning and afternoon peak traffic periods.

Mr. Richard Wood
July 17, 1995
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The traffic study does not indicate that additional vehicular or pedestrian bridges across the Ala Wai Canal are necessary to mitigate the additional flow of vehicular or pedestrian traffic, respectively, generated by convention center operations. Should non-convention center-related traffic continue to grow after the Center is completed, however, the City (possibly with State assistance) may consider vehicular bridge widenings or additional bridges. A pedestrian bridge, though not essential to accommodate those walking to the convention center from Waikiki, could enhance and facilitate access and may also be considered. If such facilities are desired in the future, the proposing agency would need to comply with the appropriate Federal and State requirements for proposing modifications on historic properties.

It is not expected that the convention center will significantly increase the potential of crime in the immediate area, nor is a change in the nature of crime (increased drug activities or prostitution) anticipated to occur. According to the convention center manager of The BC Pavilion Corporation in Vancouver, British Columbia, convention centers, such as those in Los Angeles, New Orleans, Seattle, New York, and San Diego, have tended to revitalize the neighboring community and increased public safety. Although the prospect of a large number of people coming to a facility may result in increased opportunities for crime, the proposed plan to bus the majority of visiting conventioners to the Hawai'i Convention Center facility will be a mitigating factor for potential of increased crime. Furthermore, it is noted that convention centers tend to attract more of the professionals, whereas activities such as prostitution tend to be more evident with other tourists. Also, the Hawai'i Convention Center facility is equipped to provide 24-hour security. However, the CCA remains concerned for resident and visitor safety and will initiate policies and programs that ensure this goal.

Regarding your comment about the shuttle bus operation, we note that the 49-passenger seating capacity is used as a basis for the EIS traffic study's shuttle bus analysis. Also, the EIS does not state that it would take a shuttle bus one minute to unload 50 passengers and vacate the stop for the next bus. Rather, the traffic study indicates that based on the traffic industry's standard estimates, it takes an average of 2.0 seconds per alighting (disembarking) passenger and 3.0 seconds per boarding passenger per shuttle bus. The traffic industry

Mr. Richard Wood
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standards apply a percentage increase factor to the dwell time (total time that a bus is stopped to service passengers) to account for variations in dwell time, as well as the clearance interval between buses and the arrival rate of buses. Based on these factors, the total "average" dwell time for a capacity 49-passenger shuttle bus is 2 minutes 30 seconds for unloading operations, and 3 minutes 30 seconds for loading operations. Also, we note that shuttle buses would not be allowed to double park to unload passengers due to safety concerns.

According to the EIS traffic study, for a 14,000-person convention, the six bus berths provided at the main entry drive fronting the convention center lobby should be adequate to accommodate the shuttle bus operations and number of bus trips during the heavier AM peak hour under normal conditions. During the PM peak hour, the six bus berths fronting the lobby would more than accommodate anticipated bus loading demands. Also, the two additional bus berths along the proposed widened portion of Atkinson Drive fronting the project site would be used as reserved bus berths should the six berths fronting the lobby be fully occupied. Furthermore, if necessary, up to 20 shuttle buses can be staged within the truck dock area located entirely within the convention center site.

You indicate that during inclement weather, the 2,126 visitor conventioners otherwise assumed to walk to the convention center in the morning would require shuttle bus transportation. Please be apprised that the contractor for the shuttle bus operations would secure a fixed number of bus vehicles for a specific event and this would not change due to inclement weather. Further, the assumed seating capacity of the shuttle buses can be increased by allowing standing passengers between the hotels and the convention center. According to representatives of local tour bus companies, standing passengers are presently allowed, especially for short distances like between Waikiki Hotels and the convention center. During inclement weather, the shuttle buses are expected to transport visitor conventioners who would otherwise have walked.

In regard to your concerns about potential impacts resulting from large numbers of visitor conventioners walking to the convention center from Waikiki hotels, the EIS traffic study indicates that these pedestrians would be distributed among a number of principal routes between the Waikiki hotels and the

Mr. Richard Wood
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Center. For example, principal routes would include Kalakaua Avenue, Ala Moana Boulevard, Kalia/Ena Roads, the Ala Wai Promenade, and Atkinson Drive. Also, it would be in the best interest and safety of the pedestrian conventioners to abide by traffic signals and crossings.

Regarding emergency vehicle access on the roadways, please be apprised that the streets in the area of the convention center have sufficient road width for emergency vehicles to pass traffic pulled over to the curb side.

2. Parking Problems

Parking within the convention center is designed to accommodate "offshore" convention events where most of the delegates would be transported to the site by shuttle buses. The Blaisdell Center will remain the primary venue for local events which would create a greater demand for parking. Ongoing improvements to the Blaisdell Center were funded in the amount of \$13 million by the State specifically to better accommodate local trade-shows and other large local events. To accommodate local events larger than 1,800 persons at the convention center, event organizers will be required to arrange for off-site parking and a shuttling system, as well as to establish a system whereby guests are informed before they arrive where they will be allowed to park their cars.

In regard to your comment about the expenditure of resident's taxes, the Draft EIS states that the convention center is being funded entirely by transient accommodations tax, more commonly referred to as the "hotel room tax" paid by visitors. Moreover, contrary to your opinion that property values would be lowered, the Social Impact Assessment in the Draft EIS discusses how the convention center may actually increase property values in the vicinity.

3. Noise Problems

The EIS noise study addresses the potential noise impacts resulting from the operation, as well as construction, of the convention center and identifies specific mitigation measures to reduce or minimize these impacts. According to the noise study, because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major

Mr. Richard Wood
July 17, 1995
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local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

The noise study indicates that amplified music or voice levels of 80 to 90 dB will be required in order to insure the intelligibility of music vocal performances or voice announcements over the entire roof terrace assembly area. However, the study further indicates that these noise levels could generate adverse impacts at the neighboring properties, and probably exceed the State Department of Health (DOH) daytime limit of 60 dB. For these reasons, the study indicates that use of the roof terrace area for large assemblies is not recommended unless special noise mitigation measures are employed, such as the use of portable enclosures to house large assemblies and/or small groups when amplified sound systems are required. The design of these enclosures should allow for a minimum of 30 dB of noise reduction or to limit noise emissions to levels below the applicable State DOH noise limits.

While all potential adverse impacts cannot be completely mitigated, we feel that the proposed site and facility design offer a viable project that will enhance the State's most important visitor industry complex at Waikiki.

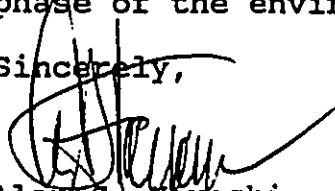
We acknowledge your option to seek legal relief for any suffering you may incur as a result of convention center construction and operation. We do not believe, however, that

Mr. Richard Wood
July 17, 1995
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the convention center project amounts to inverse condemnation of your property.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Atkinson Plaza
Association of Apartment Owners

475 Atkinson Drive • Honolulu, HI 96814

March 24, 1995

RECEIVED
MAR 28 1995

Mr. Alan S. Hayashi
Convention Center Authority
The State of Hawaii
841 Bishop Street, Room 2222
Honolulu, HI 96814

WILSON OKAMOTO & ASSOC., INC.

RE: Comments on the DEIS
Hawai'i Convention Center

Dear Mr. Hayashi:

The following comments on the DEIS relate to Convention Center impacts on the residents of Atkinson Plaza. Atkinson Plaza is a 127-unit condominium situated on the corner of Atkinson Drive and Kahakai Drive. The front entrance to the condominium and the driveway to/from parking levels 2-5 are on Atkinson Drive. The entrance/exit to parking level 1 is at the rear of the building on the one-way Kahakai Drive loop.

Construction Impacts

The short term effects during construction include noise, vibration, dust, and traffic frustrations. Mitigation to these effects needs to be strictly enforced and made public to residents in the Convention Center neighborhood. As the project progresses, we hope that Nordic/PCL takes the initiative and holds information meetings to address resident concerns and describe the mechanisms that will be put into place to resolve problems as they occur.

Operation Impacts

Traffic Impacts:

- **Impeded vehicle access to the Kahakai driveway to the parking structure and impeded vehicle egress from Kahakai Drive loop to Kahakai Drive Proper:**

Residents of Atkinson Plaza are impacted in the same manner as residents of The Summer Place and the low rise apartment buildings. The traffic mitigation for Kahakai being used as the main ingress and egress to the CC project is inadequate and problematic. Vehicles exiting Kahakai Drive must turn left back onto the 2-way section of the road. This left turn will require cutting across four lanes of convention center traffic at an uncontrolled intersection. Cars queuing to make the left turn will impede and restrict access to the entrance to the Atkinson Plaza parking structure. Ingress and egress by emergency vehicles will also be impeded.

- **Impeded vehicle ingress and egress, Atkinson Drive:**

The traffic mitigation is not adequately addressed and needs to be examined. Blockage of the Atkinson Plaza driveway, due to 1) queuing of cars waiting to turn left onto Kahakai to enter the CC and 2) queuing of buses waiting to cross Kahakai to the bus drop off point, is expected. While an additional stop light is proposed, there is not mention of the placement of a stop bar at the mauka side of the driveway. Absence of such a measure will seriously impede access to and egress from Atkinson Plaza. At the present time, access to and egress from Atkinson Plaza is often blocked by through traffic and residents must wait through 2 or more traffic light changes before being able to proceed. Cars waiting to enter the CC will probably not move as quickly. Considerable impedance to through flows on Atkinson Drive and Kapiolani Blvd. will occur.

- **Parking Impacts:**

Parking for employees of the CC and loss of parking for residents in the CC area have not been adequately addressed. The potential loss of 5 public parking spaces on Kahakai Drive for the CC project will be a hardship for all who reside in the CC project area. The original plans called for Kahakai Drive to be widened to 5 lanes. I believe the change was made to correct an omission of a walkway within the CC. I believe the plan for 5 lanes should be maintained and that space for the missing walkway be found within the CC project. Unfortunately, it is believed that the project will proceed despite public objections. Parking for employees of the CC has not been addressed. It is doubtful that they will be allowed to access to the 800 spaces. Unless provided with parking, employees will add to resident parking problems.

Parking on Atkinson Drive is currently restricted; modifications of the restricted hours to accommodate events is preferable to eliminating parking all together.

- **Noise:**

Mitigation of noise from functions held on the roof garden has not been adequately addressed. The ability to hold functions outdoors will be a selling point of the CC. Visitors will want to enjoy the warm, fresh air (although they will probably not enjoy the traffic noise and fumes). While the music and announcements may not exceed the allowable dB, if it can be heard by residents, it will be considered a nuisance. A 5 second announcement over a PA system may be acceptable but 3-5 hours of music, announcements, conversation, etc. is not acceptable and definitely will have a negative impact on the ability of the residents to enjoy an evening at home and/or sleep. The FEIS must provide detailed mitigation measures that must be strictly enforced.

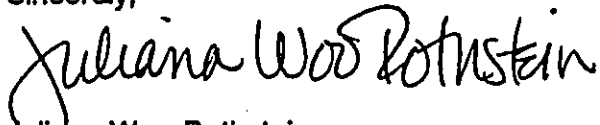
Mitigation of noise from increased traffic on Kahakai Drive due to cars, delivery trucks, etc. has not been adequately addressed. Although some may say that the area is currently noisy, the noise is primarily from the traffic traveling on Atkinson Drive, Kapiolani Blvd., and Kalakaua, NOT Kahakai. Atkinson Plaza lanais are essentially "right on the street" and the increase in the level of noise will be significantly felt by all. The noise created by the operation of the CC may exceed the threshold humans consider to be "comfortable" and yet be below the allowable dB. Atkinson Plaza is not centrally air conditioned. At present, most residents on the mauka side have not installed air conditioners, preferring the tradewinds as a natural "air conditioner". Closing the glass sliding doors and louvers in an attempt to dampen the noise is not an acceptable solution as doing so will also close off all ventilation.

- **Elimination of sidewalks along the project Kahakai Drive Frontage:**

All pedestrians will be forced to use a single, narrow sidewalk on the makai side of Kahakai Drive. It is proposed that the existing crosswalk across Atkinson Drive at Kona Street be relocated to the other side of Kahakai Drive, in front of the convention center lobby. The crosswalk is being shifted to the side of Kahakai Drive where the sidewalks have been eliminated. Although this plan serves the CC well, it will require six street crossings for a pedestrian to reach the nearest access to food and drug stores in the vicinity and at Ala Moana Center. This presents potential danger to the elderly, the handicapped and those pedestrians accompanied by children. It should be recognized that for many residents in the CC project area, the primary mode of transportation to neighborhood shops and banking institutions is by walking.

Lastly, we have been advised by our legal counsel to notify you that should access to our property be restricted or should we suffer undue nuisance by the manner and means of the Convention Center Project, we reserve the right to pursue legal action for damage resulting from the inverse condemnation of our property.

Sincerely,



Juliana Woo Rothstein
President, Board of Directors
(Apartment 607)

cc: Gary Gill, Office of Environmental Quality Control
Earl K. Matsukawa, Wilson Okamoto & Associates, Inc.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Juliana Woo Rothstein
President, Board of Directors
Association of Apartment Owners
Atkinson Plaza
475 Atkinson Drive
Honolulu, Hawaii 96814

Dear Ms. Rothstein:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Construction Impacts

The Final EIS will more clearly identify which mitigation measures will be implemented.

The design/builder plans to implement a program for keeping nearby residents apprised of construction activities and potential adverse noise, traffic or other impacts that may be anticipated during the various phases of construction.

Operation Impacts

Traffic Impacts:

Impeded Vehicle Access to the Kahakai Driveway, to the Parking Structure and Impeded Vehicle Egress from Kahakai Drive Loop to Kahakai Drive Proper:

Based on comments received on the Draft EIS, further analysis was conducted to assess the impact of convention center traffic to motorists egressing onto Kahakai Drive from the internal loop street. The capacity analysis for the intersection of Kahakai Drive and the internal loop street is analyzed as a four-legged unsignalized intersection, with the loop street and the convention center truck access legs of the intersection yielding the right-of-way (see Exhibit A). At this intersection, Kahakai Drive becomes one-way inbound from

Ms. Juliana Woo Rothstein
July 17, 1995
Page 2

Atkinson Drive. Traffic exiting the internal loop street would yield the right-of-way to traffic bound for the convention center parking garage and truck dock area, and traffic travelling down the one-way street to the residential area. The analysis demonstrates that traffic exiting the internal loop street would operate at Level of Service (LOS) B during the AM peak hour during a 14,000-person convention event. This compares with traffic exiting the internal loop street operating at LOS A during the AM peak hour without the convention center. During the PM peak hour (14,000-person event), traffic exiting the internal loop street would operate at LOS A with and without the convention center since the inbound traffic volumes on Kahakai Drive are minimal. Both LOS A and B represent very acceptable conditions (no delay or short delays). Furthermore, traffic exiting the internal loop street would not conflict with the vehicles egressing the convention center parking garage since the Center's exit ramp is located closer to Atkinson Drive.

We wish to clarify that motorists turning left onto Kahakai Drive from the internal loop street would actually be crossing up to two inbound lanes, not four lanes as you indicate (see Exhibit A). Further, during periods in which parking is allowed on the makai side of Kahakai Drive, traffic egressing the internal loop street would cross only one inbound lane on Kahakai Drive, a situation which presently exists. Also, the intersection of the internal loop street at Kahakai Drive is currently stop-controlled (with a stop sign), and not an uncontrolled intersection as you indicate. The stop-control at this intersection will remain unchanged with the convention center.

Regarding ingress/egress by emergency vehicles, the planned roadway improvements on Kahakai Drive are provided to mitigate the convention center traffic impacts. As required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic and emergency vehicles during large convention events. During periods when on-street parking on the makai side of Kahakai Drive is allowed (i.e., when large conventions are not being held), access for both residential and emergency vehicles on Kahakai Drive would be no different from current conditions.

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July 17, 1995
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Impeded Vehicles Ingress and Egress, Atkinson Drive:

In accordance with your concerns, please be apprised that the City and County Department of Transportation Services (DTS) is currently reviewing the roadway construction plans for the convention center project. Upon review, DTS will determine the appropriate traffic operational measures which may be required in the vicinity of the Atkinson Plaza driveway.

Parking Impacts:

We wish to clarify that the five (5) on-street parking spaces on the makai side of Kahakai Drive would primarily be restricted during large convention events to provide for two inbound lanes. Recognizing the limited number of on-street parking spaces in the area, the Convention Center Authority's proposal to restrict the five on-street parking spaces on an event-related basis, rather than permanently eliminating them, is intended to minimize the loss of on-street parking.

The adjustment of Kahakai Drive from the initial five lanes to the currently proposed four lanes resulted from a decrease of approximately 10 feet on the Kahakai Drive side of the convention center site during the detailed planning for an interior access from the Ala Wai Promenade side of the building to the mezzanine level. The 10-foot wide decrease was due to refinement of the earlier drafting phase of the convention center facility during the initial design competition. The adjustment of Kahakai Drive was discussed earlier this year with representatives of the Convention Center Community Network (CCCN), an organization of legislative representatives, technical experts, and community members (CCCN includes resident representation from the Kahakai Drive area). The consensus of the CCCN to the four-lane scheme was favorable since the level-of-service (LOS) would remain unchanged from the five-lane scheme, and the delays experienced by vehicles at the Kahakai Drive leg of the intersection would be imperceptible (i.e., one-half second per vehicle delay).

The EIS traffic study assessed the convention center parking needs for a 10,000-person convention using the travel forecast assumptions developed in the study. On the assumption that the estimated peak parking demand would occur during the mid-morning period, a total of 83 on-site parking stalls were estimated for the full-time convention center employees.

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July 17, 1995
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Recognizing that there may be events that would require additional temporary and part-time employees, the EIS traffic study identifies a number of parking alternatives which could become part of an overall transportation management plan by the convention center's transportation coordinator. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking; preferential on-site parking for employees who carpool to a convention event; and, issuance of public bus passes to convention center employees. In spite of such measures, on-street parking is available to the general public and, inevitably, some people will choose to seek out such parking, creating additional competition for the limited number of parking spaces available.

Parking on the ewa side of Atkinson Drive between Kapiolani Boulevard and Kona Street (about 5 stalls) will be eliminated to provide an exclusive left-turn lane on makaibound Atkinson Drive into Kahakai Drive. In addition, parking on the east side of Atkinson Drive between Kahakai Drive and Mahukona Street (9 stalls) would be restricted during the AM peak period for the proposed contra-flow operation.

Noise:

The noise study prepared for the EIS identifies mitigation measures with respect to functions which may be held on the convention center's roof terrace assembly area. The study indicates that while amplified music or voice levels of 80 to 90 dB will be required in order to insure the intelligibility of music vocal performances or voice announcements over the entire assembly area, such noise levels could generate adverse impacts at the neighboring properties, and probably exceed the State Department of Health (DOH) daytime limit of 60 dB. For these reasons, the study indicates that use of the roof terrace area for large amplified assemblies is not recommended unless special noise mitigation measures are employed, such as the use of portable enclosures to house large assemblies and/or small groups when amplified sound systems are required. The design of these enclosures should allow for a minimum of 30 dB of noise reduction or to limit noise emissions to levels below the applicable State DOH noise limits.

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Based on the findings of the noise study prepared for the EIS, noise from convention center traffic will not be significantly greater for residents in the immediate area than it would be without the Center. The noise study indicates that although traffic volumes along Kahakai Drive are expected to increase, total noise levels on the sides of Atkinson Plaza and The Summer Palace condominium buildings which face the project are not expected to increase significantly, and are predicted to decrease at the lower elevations due to the noise shielding effects of the project's building on noise from other major streets in the area. Traffic noise levels along Atkinson Drive are expected to increase by approximately 1 Ldn due to increases in project and non-project traffic.

Because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

Elimination of Sidewalks Along the Project Kahakai Drive Frontage:

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their

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appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ēwa corner of Kahakai Drive, by the Atkinson Plaza condominium (not in front of the convention center lobby as you indicate), and most residents in the Kahakai Drive area live on the ēwa side of the road, it was assumed that the sidewalk on the ēwa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

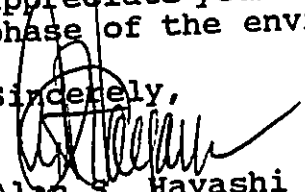
In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

We acknowledge your option to seek legal relief for any suffering you feel you may incur as a result of convention center construction and operation. We do not believe, however, that the convention center project amounts to inverse condemnation of your property.

Ms. Juliana Woo Rothstein
July 17, 1995
Page 7

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

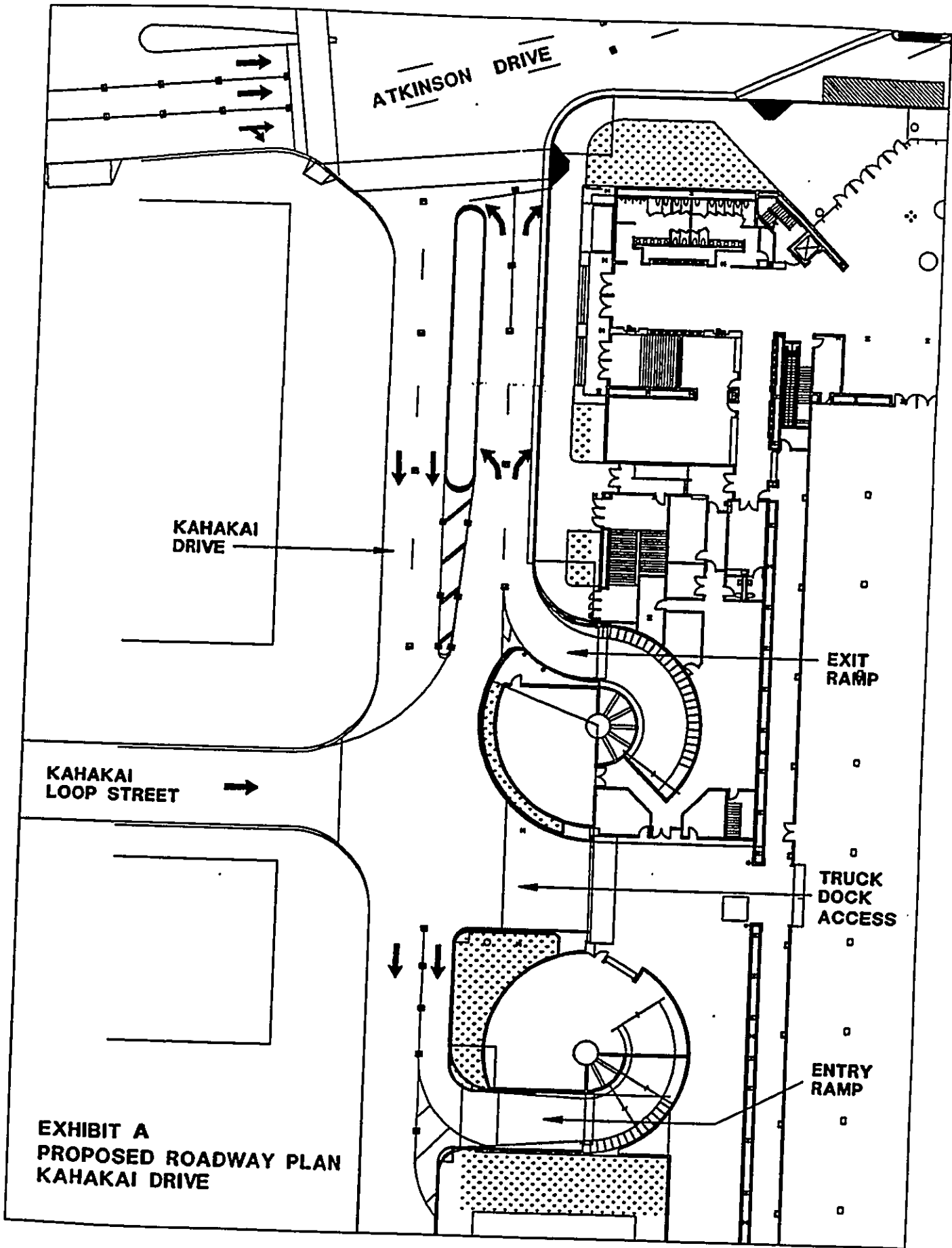
Sincerely,



Alan S. Hayashi
Executive Director

Attachment

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.





March 24, 1995

Gary Gill, Director
State of Hawaii
Office of Environmental Quality Control
220 So. King St., 4th Floor
Honolulu, Hawaii 96813

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC. INC.

Subject: Convention Center Problems

Dear Mr. Gill:

We hereby wish to notify you that should access to our property be restricted or should we suffer any negative consequences whatsoever by the manner and means of the convention center project, we reserve the right to pursue legal action for damages including but not limited to those resulting from the inverse condemnation of our property.

Attached are some of the areas of concern which we feel have not adequately been addressed or studied in depth as to their impact on businesses and permanent residents in the immediate area of the center.

We urge you to correct these potential problems and provide us with specific answers as to how and in what manner these concerns will be addressed before proceeding with any construction.

Sincerely yours,

FOR THE ASSOCIATION OF OWNERS
OF DISCOVERY BAY CONDOMINIUMS


Leon Bergman, President

/Attachment

cc: Alan Hayashi, Exec. Dir., Convention Center Authority
Earl Matsukowa, Wilson Okamoto & Assoc.
Senator Carol Fukunaga, District 12
Representative MaryJane McMurdo, District 21

SUMMARY

- Legal problems: Potential class-action law suit by surrounding condo associations.
Risk of indefinite delay.
- Traffic: Unsolved traffic jams created by looping traffic through Waikiki.
Proposed solutions inadequate, ineffective.
Vehicle volumes of key intersections over capacity - long delays.
- Parking: 800 stalls inadequate for employees and visitors
Many will be turned away.
No peripheral parking.
- Bridges: Kalakaua bridge too narrow. Cannot be widened.
Bottle-neck between CC and Waikiki. No solution.
- Pedestrians: Inadequate pedestrian facilities. Sidewalks too narrow.
Canal bridge conditions remain overcrowded & dangerous.
Ala Wai Promenade improvements to Ala Moana Blvd not budgeted.
- Footbridge: Proposed footbridge not funded by State or City.
Fictitious solution to unacceptable pedestrian conditions.
- Noise: Potential law suit by adjacent condominiums - excess noise at property line.
Traffic noise contributes to urban sense of place. Poor Hawaiian image.
- Air Quality: Air quality near entrance and along pedestrian access EXCEEDS state standards.
Poor Hawaiian Sense of Place. Reduces potential of repeat conventions.
- Ala Wai Canal: Stagnant water. No cleanup or maintenance budgeted.
Polluted Hawaiian Image. Unpredictable aesthetic conditions.
- Emergencies: Traffic configuration delays response of emergency vehicles to Waikiki .
- Construction: No provision for convention center cost overruns.
Inadequate funding to achieve true world class conditions.
Site will be surrounded by noisy, dusty construction for years after opening.
- SEVERELY LIMITS CENTER MARKETABILITY.
- Expansion: No room for preferred HORIZONTAL expansion on site.
Proposed vertical expansion not "world class" - planned obsolescence.
REDUCED MARKETABILITY.
- New Hotels: Parcels across from CC lobby already approved for hotels as principal use.
Study optimistically projects need for 7700 additional visitor units.
Redevelopment & economic stimulus directed AWAY FROM WAIKIKI.



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Leon Bergman
President
Discovery Bay Condominiums
1778 Ala Moana Boulevard
Honolulu, Hawaii 96815

Dear Mr. Bergman:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS.

We acknowledge your option to seek legal relief for any suffering you feel you may incur as a result of convention center construction and operation. We do not believe, however, that the convention center project amounts to inverse condemnation of your property.

We offer the following responses in the respective order of your summary of concerns:

Legal Problems:

As indicated above, we acknowledge the option of surrounding condominium associations to seek legal relief for any suffering they feel they may incur as a result of convention center construction and operation.

Traffic:

Your comment that the convention center operation will result in unresolved traffic jams created by looping traffic through Waikiki, and that the proposed solutions are inadequate and ineffective, is not supported by the EIS traffic study. In this regard, the EIS traffic study is to determine the impact that the convention center will have on traffic conditions and to identify and assess the effectiveness of mitigation measures. The proposed mitigation have been assessed to be effective in reducing convention center traffic impacts to levels comparable to that without the convention center. On the other hand the City's ongoing Waikiki Regional Traffic

Mr. Leon Bergman
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Impact Plan has a broader responsibility to address the overall traffic congestion in the study region. The City's regional study will analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State).

Your comments also imply that vehicle volumes at key intersections are over-capacity, resulting in long delays. During the AM peak hour in 1998, the intersection of Kalakaua Avenue/Kapiolani Boulevard is projected to be over-capacity, even without the convention center project. The proposed roadway improvements at the intersection would increase its capacity and mitigate the convention center traffic impacts.

With a 14,000-person event during the AM peak hour, the intersection of Ala Moana Boulevard/Atkinson Drive is projected to be over-capacity. We note, however, that a 14,000-person event is anticipated to occur once every three years. In recent discussions between the State Convention Center Authority (CCA) and the State Department of Transportation (DOT), the DOT has indicated that they are further evaluating a right-turn lane on Ala Moana Boulevard at Atkinson Drive as part of its Ala Moana Boulevard improvement project. The decision by the State DOT to implement this improvement, however, is subject to the results of the City's Waikiki Regional Traffic Impact Plan which is anticipated for completion in August 1995. The CCA will participate in ongoing discussions with the State DOT regarding the Ala Moana Boulevard/Atkinson Drive intersection.

We wish to emphasize that the key intersections in the vicinity of the convention center would experience long delays even without the convention center traffic. The proposed convention center roadway improvements would mitigate the anticipated additional delays resulting from the convention center traffic.

Parking:

In regard to your concern that the 800 on-site stalls is inadequate for convention center employees and visitors, please be apprised that the number of on-site parking spaces was established on the basis that the Center's primary market is intended to be off-shore national and international

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conventions, trade shows, exhibitions, and meetings where most of the delegates would be transported to the site by shuttle buses. Accordingly, there are currently no plans to develop peripheral parking in association with the convention center facility.

To the extent that there may be events demanding more parking, such as those involving a higher proportion of local residents, those requiring additional temporary and part-time employees, or those involving trade show exhibitors who may require special parking needs, the EIS traffic study identifies a number of parking alternatives which could become part of an overall transportation management plan by the convention center's transportation coordinator. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include use of existing outlying parking facilities and shuttling the attendees to the Center; arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking as a means to prevent "turn-aways" from driving up to a full parking garage; and, issuance of public bus passes to convention center employees.

Bridges:

The EIS traffic study demonstrates that convention center-generated traffic does not require widening of the Kalakaua Avenue bridge or additional vehicular bridges across the Ala Wai Canal to provide additional through lanes into Waikiki. Should non-convention center-related traffic continue to grow after the Center is completed, however, the City may consider vehicular bridge widenings or additional bridges for traffic in the future. If such facilities are necessary in the future, the proposing agency would need to comply with the appropriate Federal and State requirements for proposing modifications on historic properties.

Pedestrians:

According to the pedestrian analysis conducted for the EIS traffic study, the typical City sidewalks on the approaches to the convention center should be adequate to handle the projected convention center pedestrian volume. The sidewalks to be constructed in association with the convention center

Mr. Leon Bergman
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along its frontages should accommodate the cumulative pedestrian demands.

The EIS traffic study does not indicate that bridge widenings or additional pedestrian bridges across the Ala Wai Canal are necessary to mitigate the additional flow of pedestrian traffic generated by convention center operations. A future pedestrian bridge over the Canal could enhance and facilitate access to the convention center for walkers, but it would be subject to compliance with the appropriate Federal and State requirements for proposing modifications on historic properties by the proposing agency.

The \$350 million established by Legislative H.B. No. S7-93, which provided a mechanism for selecting a site and financing the development of a convention center facility, is applicable only to the former Aloha Motors property and not for improvements along the Ala Wai Promenade to Ala Moana Boulevard. Nevertheless, the design/builder is proposing some pedestrian-oriented facilities, including paved walkways, lighting, landscaping, and street furniture within the Promenade in front of the convention center, to Kalakaua Avenue. Due to the historic significance of the Promenade, these improvements would be subject to the review of the State Historic Preservation Division pursuant to Section 106 of the National Historic Preservation Act. In general, it is our understanding that the SHPD considers pedestrian use of the Promenade to be consistent with its historic character but that improvements should be kept to a minimum. The current discussion focuses on what the maximum width of walkways should be and what other improvements would be appropriate. The Final EIS will discuss the SHPD's Section 106 review of the various aspects of the convention center's impact on the Ala Wai Promenade.

Footbridges:

As indicated in our previous response, the EIS traffic study does not indicate that bridge widenings or an additional pedestrian bridge across the Ala Wai Canal are necessary to mitigate the additional flow of pedestrian traffic generated by convention center operations.

CORRECTION

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



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

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Noise:

The design/builder has committed to construction phase noise mitigation measures, including the erection of 16-foot high noise barriers along the Kahakai Drive boundary and pre-drilling through the upper coral layer for piles to be driven to the lower coral layer, thus reducing the number of blows required to install piles. Also, noisier equipment such as generators will be staged in locations at least 400 to 500 feet away from the residences, when possible. State Department of Health (DOH) rules will govern all aspects of construction noise, including allowable days and hours that noisier construction activities may occur, and requirements for mufflers on trucks and other equipment.

In the design of the convention center, DOH standards for noise levels at the property line will be met with respect to noise from mechanical equipment and trucks and other vehicles within the convention center. Traffic noise, primarily buses and trucks along Kahakai Drive, will need to meet DOH standards for vehicular noise.

With respect to functions at the convention center, particularly on the roof terrace assembly area, the CCA will require the future convention center operator to comply with DOH rules for noise at the property line. This may restrict the use of any voice or music amplification systems or require the use of portable sound attenuation structures.

Air Quality:

As indicated in the EIS air quality study, a decline in carbon monoxide (CO) levels near the studied intersections is projected despite traffic growth. Nevertheless, under worst-case meteorology during peak traffic hours, there appears to be a potential for exceedance of the State CO standards near the intersections of Kapiolani Boulevard/Kalakaua Avenue and Atkinson Drive/Kapiolani Boulevard. However, according to the air quality study, there are several factors which mitigate against this being a matter for serious concern. First, the predicted exceedances were found only close to the intersection (where people would not be expected to remain for 1 or 8 hours) and only at particular receptor locations; beyond that, all standards are met. Secondly, the probability of worst-case conditions occurring and persisting for 1 to 8 hours is low. Third, the predicted exceedances occur with or

Mr. Leon Bergman
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without the convention center project. The project itself caused a mean increase of 3.4 percent over what was predicted without the project. Fourth, the State CO standard is very conservative, lying well below the National CO standard. As such, we disagree with your opinion that the air quality would reduce the potential of repeat conventions.

Ala Wai Canal:

As a document intended to disclose environmental and social impacts of constructing and operating the convention center, the EIS would not generally discuss impacts of factors such as the Ala Wai Canal on the convention center. Nevertheless, the ongoing maintenance of a litter-free and enhanced water quality environment along the Ala Wai Canal are in the best long-term interests of the operation of the convention center given its proximity and visual amenity to visitors. Interior spaces, including truck docks and parking areas, will drain to the sanitary sewer system rather than to the Ala Wai Canal. Drainage from the convention center will be mostly limited to the exterior roof and planting areas, from which grated inlets and filter traps will be used to screen and prevent debris from entering the Canal.

In the short-term, the design/builder of the convention center has submitted to the State DOH a National Pollutant Discharge Elimination System (NPDES) storm water construction permit application. Included with the application are storm water runoff control structures and a Best Management Practices Plan to be employed in the construction of the convention center which will mitigate the effects of storm water runoff from the site into the Ala Wai Canal.

Emergencies:

We are uncertain as to what is meant by traffic "configuration" delays response of emergency vehicles to Waikiki. In regard to this concern, please be apprised that among the most important project mitigation measure is the provision of an additional lane of traffic along Kalakaua Avenue and Kapiolani Boulevard, an additional lane along Atkinson Drive, and two (2) additional traffic lanes along Kahakai Drive to accommodate convention center traffic. All of these road widenings will be on the convention center property and, in combination, are anticipated to offset the

Mr. Leon Bergman
July 17, 1995
Page 7

impacts of traffic created by the convention center during peak traffic hours. Furthermore, as required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic and emergency vehicles during large convention events. We also note that the streets in the area of the convention center have sufficient road width for emergency vehicles to pass traffic pulled over to the curb side.

Construction:

As indicated previously, the \$350 million established by Legislative H.B. No. S7-93 provided a mechanism for selecting a site and financing the development of a world-class convention center facility. Of this amount, approximately \$200 million was budgeted for the design and construction of the project. The Request for Proposals (RFP) for development of the convention center set forth specific design criteria for achieving a world-class facility. Pursuant to the RFP, the design/builder is responsible to implement the proposed mitigation measures identified in the EIS within the \$200 million. Upon operation of the convention center, the CCA will be responsible to ensure that the operator of the Center implements the operational mitigation measures identified in the EIS.

While the EIS acknowledges that the convention center would create opportunities for redevelopment of adjacent parcels, we note that it is the responsibility of the respective developer(s) to implement construction-related noise and air quality mitigation measures in compliance with the respective State DOH Administrative Rules on noise control and air pollution control.

Expansion:

The requirement that the 200,000 square-foot exhibition hall be located on one level, as set forth in the RFP for development of the convention center, essentially precluded any option for horizontal expansion of the facility given the site constraints. It should be noted that the three other convention center designs in the competition phase also included plans for vertical expansion. To accommodate this expansion, structural requirements for supporting the expansion have been incorporated in the current design. We do

Mr. Leon Bergman
July 17, 1995
Page 8

not understand the basis for your opinion that the proposed vertical expansion would not exemplify a "world class" facility, and that it severely limits the Center's marketability. As indicated above, the RFP set forth specific design criteria for a world-class convention center, including future facility expansion.

New Hotels:

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

In the revised assessment, the net new hotel room night demand, Statewide, in the year 2008 has been revised to range from 6,130 to 7,500 for the "lower attendance and spending" scenario and the "higher attendance and spending" scenario, respectively. Using the higher demand scenario, of the 7,500 room nights Statewide, 4,900 room nights would be on Oahu, based on an average of 5.77 days spent on Oahu out of the 8.14 conventioner days. Of the Oahu demand of 4,900 room nights, approximately 2,800 room nights can be met by increasing room occupancy rates at the existing 28,414 hotel units on Oahu from 80 to 90 percent. Another 300 units would be effectively added by the opening of the new Hale Koa tower (this is based on 75 percent of the 396 units to be added, assuming that it will relieve the current overflow demand of active and retired military personnel on other hotels in Waikiki and free them up for use by conventioners). Of the remaining 1,800 room nights, it is anticipated that visitors (other than conventioners) will continue to shift their demand to the Neighbor Islands which could be expected to absorb about 60 percent of this demand. The remaining 720 units could be met by development on Oahu, without rezoning, at the planned Kalia Tower at Hilton Hawaiian Village (400 units) and the Aloha Tower project (450 units).

Mr. Leon Bergman
July 17, 1995
Page 9

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

THE SUMMER PALACE

Association of Apartment Owners
1848 Kahakai Drive • Honolulu, Hawaii 96814

March 6, 1995

Dear Mr. Hayashi,

We are sending you our preliminary comments on the draft EIS early in the process in the hope that design modifications will be made before the issuance of the Final EIS and 60% drawing documentation are completed.

After reviewing the DEIS on Feb 6, 1995, we believe several issues require the immediate attention of the CCA, Nordic/PCL, and Wimberly, Allison, Tong & Goo. After our discussion on the telephone, you referred me to Mr. Ty Sutton at Sutton Candia Partners. On Feb. 7, after reviewing the more detailed 30% drawings of the project in Mr. Sutton's office and discussing the problem areas with him, we concurred that an on-site comparison of the drawings to the site and its perimeter was necessary. On Feb. 8, I met again with Mr. Sutton at the Summer Palace Condominium site on Kahakai Drive, abutting the Convention Center site.

For the record, we document the following serious concerns of equal priority:

I. IMPEDED VEHICLE ACCESS TO KAHAKAI DRIVE RESIDENCES

The traffic mitigation for Kahakai Drive being used as the main ingress and egress to the CC project is provided by widening the road to form two lanes in and two lanes out. However, if cars are permitted to park in the 5 stalls on the makai side, fronting the project, ingress will be reduced to only one lane in. This one lane is insufficient to guarantee unimpeded access to Kahakai Drive through traffic and emergency vehicles.

This, in conjunction with the possible staging of overflow buses in front of the Atkinson Plaza and on Kahakai Drive, has the potential of completely cutting off access to residences bound by the dead end loop.

We understand that on-street parking already is over-burdened in the area; however the elimination of these 5 stalls is of equal or greater importance as the other stalls already being eliminated by the project. Although the DEIS calls for event-related control of these 5 stalls, the situation could arise at any time when there will be cars parked in one lane while the other lane is congested, resulting in denied access of emergency vehicles to Kahakai Drive as well as to regular residents and visitors to the Kahakai Drive loop. In the event of an emergency, this would be a case of negligence and liability on the part of the state and/or city by reason of foreknowledge for the potential danger without action to prevent such danger.

It is unfortunate and inconvenient, nevertheless, these five stalls also must be sacrificed to the CC project in order to maintain a dedicated through lane to Kahakai Drive.

This restricted access poses a serious problem for The Atkinson Plaza Condominium, The Summer Palace Condominium, and for residents of all of the low rise properties on the Kahakai Drive loop. Approximately 1,000 people live on this street and their needs and rights must not be slighted.

II. IMPEDED VEHICLE EGRESS FROM KAHAKAI DRIVE LOOP TO KAHAKAI DRIVE PROPER

Due to the one-way loop configuration of Kahakai Drive beyond the project site, vehicles wanting to exit Kahakai Drive from any point other than the convention center, must travel around the loop and turn left back onto the 2-way section of the road. This left turn requires cutting across four lanes of convention center traffic at an uncontrolled intersection. This means waiting for a simultaneous break in the inbound and outbound convention center traffic simply to queue up for the proposed signal at Kahakai Drive and Atkinson Drive. Queuing will no doubt prevent easy reentry onto Kahakai Drive and queuing will also probably occur on the loop as well. Mitigation measures offered in the DEIS consist of a mere suggestion that traffic should be managed on an "event-related" basis by an employee of the convention center. Even if there were a full-time traffic director at that intersection, his job priority would be to move vehicles OUT of the convention center.

We submit that this plan is grossly inadequate and requires careful reconsideration and modification. It should be noted that most of the small residential low-rise units have been consolidated and will probably be replaced with more vehicle intensive uses in the very near future.

III. TRUCK INGRESS & EGRESS FROM CC LOADING BAYS & SERVICE AREA

A review of figure 2-5 shows the CC building in its entirety from Atkinson Drive to the canal. The Summer Palace building is included in the south elevation of the project but excluded from the west elevation of the project. Closer inspection of the drawings reveal that the heavy truck access to the convention center is simply an open roadway running parallel to the Summer Palace just over the property line. Heavy trucks finally enter the facility approximately 30 feet from the Ala Wai Park promenade, through a combined garage opening approximately 75 feet wide. This presents a major problem for the Summer Palace Condominium, for the general public using the Ala Wai Park, for conventioners approaching the CC on the promenade from the Ala Moana direction, and to the residents of the Marina Towers Condominium directly across the canal from the open heavy truck roadway.

During off-peak hours, 10 truck trips per hour translates to 10 trips in and 10 trips out, totalling 20 passes on Kahakai Drive AND on the exposed truck driveway on the project site. Twenty passes per hour equates to one pass every three minutes! Surely, this will generate unacceptable noise levels evenly paced throughout the off-peak period. Since on-site noise sources were not considered in the traffic noise study (perhaps because it was not clear that this truck drive is exposed), this noise problem was not completely addressed in the DEIS. Since the truck driveway is on the site, DOH property line noise limits will apply to the truck driveway. The only mitigating measures suggested that relate to heavy truck noise levels are "minimizing high speed idling and use of lower engine RPM during acceleration". Since trucks must use high engine RPM in lower gears at maneuvering speeds, i.e., Kahakai Drive turns: 1 left into CC, one right onto truck driveway, another left into garage opening.

We submit that this recommended mitigating measure is completely ineffectual and would offer no noise attenuation whatsoever.

May we offer a possible solution? We suggest enclosing the truck route entirely along the west elevation of the facility starting at the point of entry on Kahakai Drive. This simple solution would eliminate the noise, soot, and odor nuisances and dramatically improve the aesthetics and public health of residents of the south-western corner of the project. Through enclosure, truck noise and odor annoyance to residents and visitors would be eliminated at the Ala Wai Park, Summer Palace, Marina Towers, AND for convention center users on the multi-level terraces of the project.

IV. SIDEWALKS ELIMINATED ALONG THE PROJECT'S KAHAKAI DRIVE FRONTAGE

According to the plan, pedestrian access to the Summer Place Condominium has been severely restricted. The setback of the project on Kahakai Drive is only five feet and does not include pedestrian access to the residential properties beyond the project site. In addition, the existing crosswalk across Atkinson Drive at Kona Street is proposed to be relocated to the other side of Kahakai Drive in front of the convention center (CC) lobby. In overview, the crosswalk is being shifted to the side of Kahakai Drive where the sidewalks have been eliminated. Although this plan serves the CC well, it will require six street crossings for a pedestrian to reach the nearest access to food and drug stores in the vicinity and at Ala Moana Center. We believe this presents undue hardship and danger to the elderly, the handicapped, and those pedestrians accompanied by children.

It is our hope that this pedestrian plan can be improved to better accommodate the neighboring residential community.

V. OPEN PARKING DECK INCOMPATIBLE WITH SUMMER PALACE RECREATION DECK

We acknowledge and appreciate your special effort to buffer the Summer Palace recreation deck through use of landscaping on the project's roof-top garden. However, it must be clarified that the Summer Palace recreation deck corresponds laterally to the CC open parking level, not the roof garden deck. Inspection of the design plans for the project indicate that in addition to heavy trucks entering and exiting directly below, the open parking facility of the CC is basically at eye-level with the Summer Palace recreation deck without the benefit of screening, landscaping, planter boxes or grillwork.

We suggest again, that the roof of the enclosure of the truck route below would provide a base for landscaping at the project's parking level to insure the privacy and quality of life for the residents at Summer Palace. In addition, please consider partial closure and small-aperture grill work for your parking level on the western elevation of the project that faces the Summer Palace in close proximity. Other frontages can be left open without compromising security or privacy of the convention center or neighboring properties.

VI. POTENTIAL BREACH OF SECURITY AT PROJECT PERIMETER

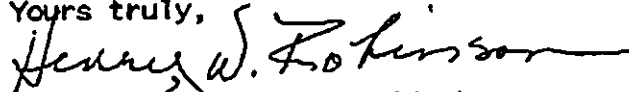
The open truck driveway at the southern perimeter poses a security risk for both the convention center facility and for the Summer Palace. Convention center plans call for a six foot fence at the property line. The ground level of the Summer Palace is an open parking level with access from Kahakai Drive bordered by a chain link fence along the Ala Wai Park frontage. The open

entry to the CC loading docks and service areas are completely exposed at ground level to the open Summer Palace ground level AND in direct view of passers-by on the Ala Wai Promenade. Please note also that the Summer Palace lobby is naturally ventilated through cement grillwork in close proximity to the service entrance to the convention center. Again, complete enclosure of the truck driveway and entrance to the CC loading dock and service area would solve this security problem, as well as the unpleasant aesthetics of having an open view of the CC service area from the park and the canal.

The Summer Palace Board of Directors has furnished Sutton Candia Partners with complete blueprints of the Summer Palace Condominium building and an on-site photography opportunity in order to improve the present design plan.

Thank you for the immediate response to our request for information. We respectfully request that you respond to our above concerns as soon as possible.

Yours truly,



Henry W. Robinson, President
Summer Palace Board Directors



Charles Baum, Chair.
Committee on Convention Center Development

CC:

Mr. Charles Sutton, Sutton Candia Partners 526-0038
Mr. Mits Kaneshige, Nordic/PCL Joint Venture
Mr. Earl Matsukawa, Planning Director, Wilson Okamoto & Assoc 946-2253
Mr. Clint Nagata, Wimberly, Allison, Tong & Goo 922-1250
Mr. Wright Hiatt, Convention Center Community Network 586-6251



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Henry W. Robinson
President, Summer Palace Board of Directors
Mr. Charles Baum
Chair, Convention Center Development
The Summer Palace
1848 Kahakai Drive
Honolulu, Hawaii 96814

Dear Mr. Robinson and Mr. Baum:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 6, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. Impeded Vehicle Access to Kahakai Drive Residences

We reiterate that parking on the makai side of Kahakai Drive (5 spaces) would be restricted during large convention events to provide for two inbound lanes. As required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic and emergency vehicles during large convention events. During periods when such on-street parking is allowed (i.e., when large conventions are not being held), access for both residential and emergency vehicles on Kahakai Drive would be no different from current conditions.

Recognizing the limited number of on-street parking spaces in the area, the Convention Center Authority's proposal to restrict the five on-street parking spaces on an event-related basis, rather than permanently eliminating them, is intended to minimize the loss of on-street parking. However, if the majority of the area residents favor eliminating these five spaces, they may consider submitting a petition to the City Department of Transportation Services requesting a permanent ban of this on-street parking.

Also, we wish to clarify that there are no plans to stage any overflow of shuttle buses in front of Atkinson Plaza and on

Mr. Henry W. Robinson and Mr. Charles Baum
July 17, 1995
Page 2

Kahakai Drive. In addition to the two reserve bus berths along the proposed widened portion of Atkinson Drive fronting the convention center, up to 20 shuttle buses can be staged in the Center's truck dock area.

II. Impeded Vehicle Egress from Kahakai Drive Loop to Kahakai Drive Proper

Based on comments received on the Draft EIS, further analysis was conducted to assess the impact of convention center traffic to motorists egressing onto Kahakai Drive from the internal loop street. The capacity analysis for the intersection of Kahakai Drive and the internal loop street is analyzed as a four-legged unsignalized intersection, with the loop street and the convention center truck access legs of the intersection yielding the right-of-way (see Exhibit A). At this intersection, Kahakai Drive becomes one-way inbound from Atkinson Drive. Traffic exiting the internal loop street would yield the right-of-way to traffic bound for the convention center parking garage and truck dock area, and traffic travelling down the one-way street to the residential area. The analysis demonstrates that traffic exiting the internal loop street would operate at Level of Service (LOS) B during the AM peak hour during a 14,000-person convention event. This compares with traffic exiting the internal loop street operating at LOS A during the AM peak hour without the convention center. During the PM peak hour (14,000-person event), traffic exiting the internal loop street would operate at LOS A with and without the convention center since the inbound traffic volumes on Kahakai Drive are minimal. Both LOS A and B represent very acceptable conditions (no delay or short delays). Furthermore, traffic exiting the internal loop street would not conflict with the vehicles egressing the convention center parking garage since the Center's exit ramp is located closer to Atkinson Drive.

We wish to clarify that motorists turning left onto Kahakai Drive from the internal loop street would actually be crossing up to two inbound lanes, not four lanes as you indicate (see Exhibit A). Further, during periods in which parking is allowed on the makai side of Kahakai Drive, traffic egressing the internal loop street would cross only one inbound lane on Kahakai Drive, a situation which presently exists. Also, the intersection of the internal loop street at Kahakai Drive is currently stop-controlled (with a stop sign), and not an uncontrolled intersection as you indicate. The stop-control

Mr. Henry W. Robinson and Mr. Charles Baum
July 17, 1995
Page 3

at this intersection will remain unchanged with the convention center.

You indicate that even if there was a full-time traffic director at the intersection of Kahakai Drive and the internal loop street, his priority would be to move vehicles out of the convention center. First, the decision to station traffic control personnel at key access points near the convention center would be on an event-related basis (i.e., for the largest events, if deemed necessary). Secondly, the traffic control personnel would be responsible to direct the movement of all vehicles which pass through the particular intersection or access point.

We acknowledge your comment indicating that most of the small residential low-rise buildings in the Kahakai Drive area have been consolidated and will probably be replaced with more vehicle intensive uses in the near future. However, we note that the developer(s) of any redevelopment project is responsible for assessing the traffic impacts and providing mitigation measures to reduce the impacts accordingly.

III. Truck Ingress and Egress from CC Loading Bays and Service Areas

Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

IV. Sidewalks Eliminated Along the Project's Kahakai Drive Frontage

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead landscaping was proposed on the Kahakai Drive face of

Mr. Henry W. Robinson and Mr. Charles Baum
July 17, 1995
Page 4

the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive, by the Atkinson Plaza condominium (not in front of the convention center lobby as you indicate), and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in the Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

V. Open Parking Deck Incompatible with Summer Palace Recreation Deck

As part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may otherwise be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace. We note that the elevation of the convention center's parking garage is approximately 14 feet higher than the pool and recreation deck of The Summer Palace.

Also, as indicated in our response no. III above, the CCA and the design/builder are considering enclosing the truck dock

Mr. Henry W. Robinson and Mr. Charles Baum
July 17, 1995
Page 5

driveway between the convention center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. As the decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium, this issue is unresolved at this time and will be identified as such in the Final EIS.

VI. Potential Breach of Security at Project Perimeter

Please be apprised that the convention center's truck loading dock is fully enclosed along the Ala Wai Promenade. Also, as indicated above, the CCA and the design/builder are considering enclosing the truck dock driveway between the convention center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. The driveway enclosure would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The enclosure of the on-site truck access would consist of a solid wall replacing the earlier plan for a six-foot fence at the property line as referred to in your letter.

We acknowledge that The Summer Palace Board of Directors have furnished Sutton Candia Partners with complete blueprints of The Summer Palace building and an on-site photography opportunity.

Mr. Henry W. Robinson and Mr. Charles Baum
July 17, 1995
Page 6

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

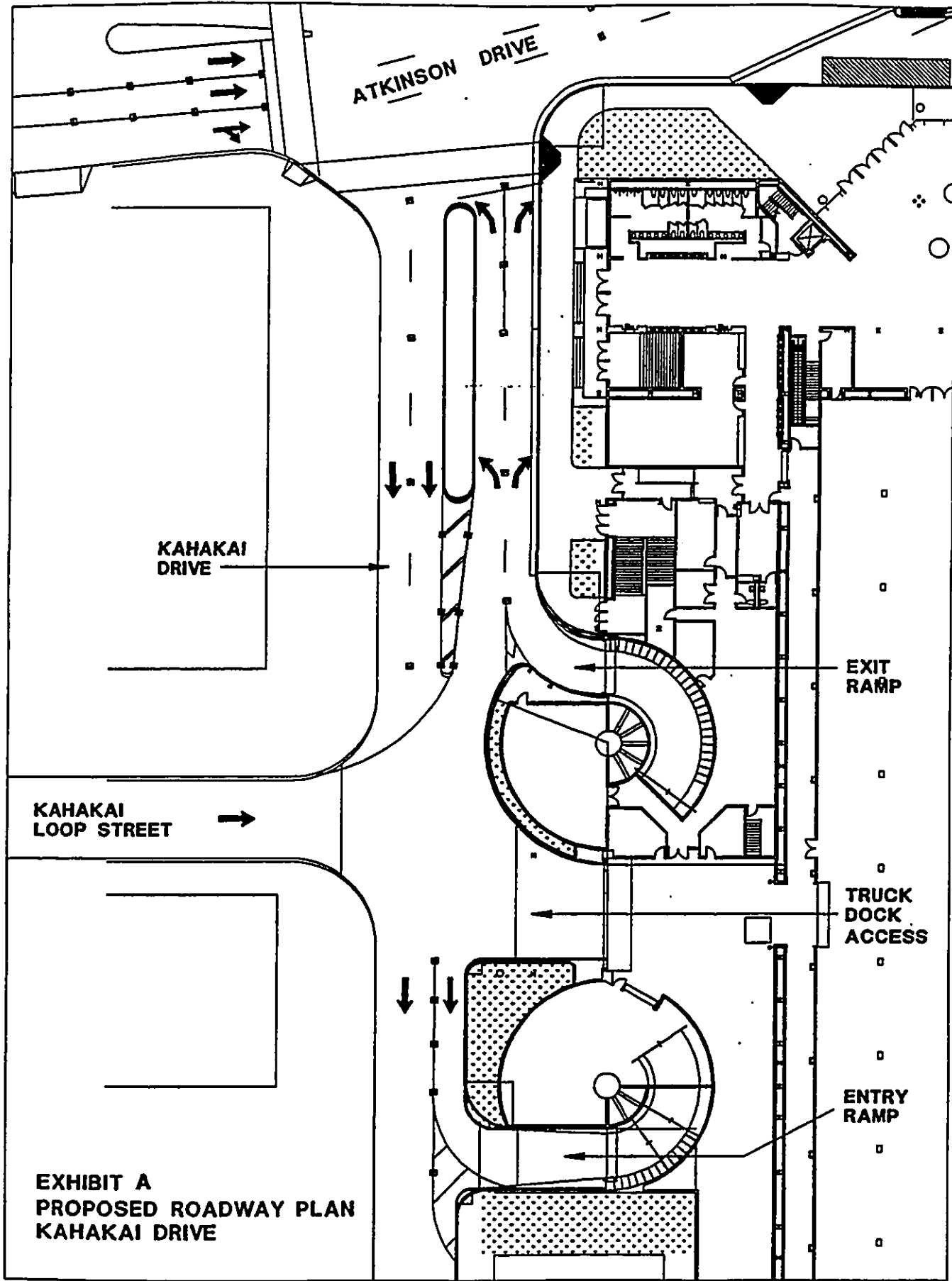
Sincerely,

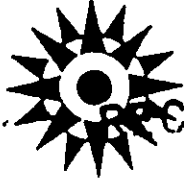


Alan S. Hayashi
Executive Director

Attachment

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.





RECEIVED

POSTED
3/25/95

95 MAR 28 11:34

Yacht Harbor Towers

1600 1650 Ala Moana Blvd. Honolulu, Hawaii 96813 Telephone 947-1855 Fax 942-0124
QUALITY CONTROL

March 23, 1995

Gary Gill, Director
State of Hawaii
Office of Environmental Quality Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Subject: **Environmental Concerns Regarding Proposed
State Convention Center; Reservation of Rights**

Dear Director Gill:

As neighbors of the proposed new State Convention Center to be built at the Atkinson Drive, Kapiolani Boulevard, Kalakaua Avenue "Aloha Motors" site, the members of the **ASSOCIATION OF APARTMENT OWNERS OF YACHT HARBOR TOWERS** (the "Association") are obviously very concerned with the potential adverse environmental impact that both the construction and future operation of the major project will have on our neighborhood. At their Annual Meeting held on March 21, 1995, the members of the Association unanimously resolved to direct the Association's President to correspond to you on behalf of all Apartment Owners at Yacht Harbor Towers and express this concern.

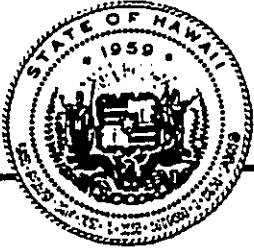
This letter shall also serve to notify you and the State of Hawaii that should access to, or use of our property be restricted during the construction or future operation of the Convention Center, or should we suffer undue nuisance by the manner and means of the Convention Center project, the Apartment Owners of Yacht Harbor Towers reserve the right to pursue legal action to recover damages that may be caused to them, including but not limited to damages resulting from the inverse condemnation of our property.

We respectfully request that the Association's aforementioned concerns and this letter be made a part of your official Environmental Impact Statement being prepared by your Office for the new State Convention Center.

Very Truly Yours

**ASSOCIATION OF APARTMENT
OWNERS OF YACHT HARBOR TOWERS**

By: 
HUGH MITCHELL
Its President



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Hugh Mitchell
President
Yacht Harbor Towers
1600/1650 Ala Moana Boulevard
Honolulu, Hawaii 96815

Dear Mr. Mitchell:

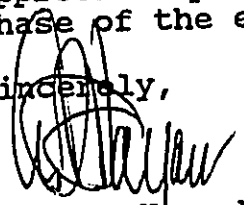
Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995
commenting on the subject Draft EIS.

We acknowledge your option to seek legal relief for any
suffering you feel you may incur as a result of convention
center construction and operation. We do not believe,
however, that the convention center project amounts to inverse
condemnation of your property.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

NEELEY & ANDERSON
ATTORNEYS AT LAW
733 BISHOP STREET, SUITE 2301
GROSVENOR CENTER, MAKAI TOWER
HONOLULU, HAWAII 96813

JOYCE Y. NEELEY
M. ANNE ANDERSON
GISELA IGLESIAS
PHILIP L. LAHNE
PATRICIA G. RILEY
CYNTHIA T. TAI

TELEPHONE
(808) 536-8177

FACSIMILE
(808) 536-4977

March 24, 1995

Gary Gill, Director
State of Hawaii
Office of Environmental Control
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

RECEIVED
MAR 30 1995

WILEN OKAMOTO & ASSOCIATES

RE: Sunset Towers - Impact of Development of Convention Center at Aloha Motors Site

Gentlemen:

Our law office represents the Association of Apartment Owners of Sunset Towers (the "Association"). We understand that public comment is currently being accepted on the environmental impact statement that was prepared for the Convention Center to be developed on the Aloha Motors site and that the last day for submission of comments is March 25, 1995. As such, we are submitting the following brief comments on behalf of the Association.

We have not reviewed the environmental impact statement and therefore are unable to comment on all of the matters raised in the statement. However, we do understand that the environmental impact statement indicates that there may be problems with traffic if the Convention Center is developed on the Aloha Motors site. As such, we have been asked to advise you as follows:

The Association reserves all of its rights and remedies in connection with the development and use of the Convention Center, including, but not limited to, the right to seek injunctive and/or monetary relief should the development or use of the Convention Center hinder or restrict access to the Sunset Towers condominium project or cause an annoyance or nuisance or otherwise interfere with the rights or privileges of the Association, its members, or the occupants of the condominium project.

Gary Gill, Director
State of Hawaii
Office of Environmental Control.
March 24, 1995
Page 2

The Association appreciates the opportunity to submit its comments.
Please do not hesitate to contact me if you have any questions in
connection with the foregoing.

Sincerely,



M. Anne Anderson

sunset\convention.ltr

cc: Board of Directors
Association of Apartment Owners
of Sunset Towers

Mr. Alan Hayashi, Executive Director
Convention Center Authority

Mr. Earl Matsukawa
Wilson, Okamoto & Associates



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. M. Anne Anderson
Neeley & Anderson
Attorneys at Law
733 Bishop Street, Suite 2301
Honolulu, Hawaii 96813

Dear Ms. Anderson:

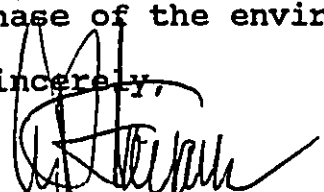
Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995
commenting on the subject Draft EIS.

We acknowledge the option by the Association of Apartment
Owners of Sunset Towers to seek legal relief for any suffering
they feel they may incur as a result of the development and
operation of the convention center. We wish to clarify,
however, that the EIS traffic study demonstrates that the
proposed roadway improvements (i.e., lane widenings and
traffic signals) and operational traffic improvements will
mitigate convention center-related traffic impacts.

Your letter, along with this response, will be reproduced in
the forthcoming Final Environmental Impact Statement. We
appreciate your interest and participation in the consultation
phase of the environmental review process.

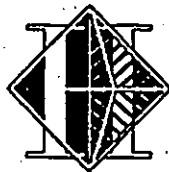
Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CHAPTER TEN

INDIVIDUALS
Comments Received and Responses



Hawai'i Convention Center

MAR 25 1995

March 25, 1995

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
1833 Kalakaua Avenue, Suite 800
Honolulu, Hawaii 96815

Comments-Hawaii Convention Center Draft Environmental Impact Statement

Dear Mr. Hayashi,

Thank you for the numerous opportunities the CCA has provided for input from a broad spectrum of individuals and organizations. I've appreciated the openness and inclusiveness of the process. Following my review of the Draft Environmental Impact Statement Volumes 1 and 2, I wish to commend the Design Build Team Nordic/PCL and Wilson Okamoto & Associates for the preparation of these documents, as well as my appreciation for the copies I received. The Draft EIS for the Hawaii Convention Center is highly informative, and makes a genuine effort to be responsive to comments and concerns. It's also intellectually stimulating and leads one to reflect upon new or related questions and solutions.

I. The EIS Traffic Study needs to relate and mesh with the Waikiki Regional Traffic study, as mutual interests are involved. Definitive measures to mitigate vehicular traffic at the convention center site, as well as the surrounding areas, must be worked out cooperatively, with all stakeholders before the convention center opens to insure smooth operations at the site and mitigate impacts in adjacent neighborhoods.

II. Pedestrian Experience to and from the Convention Center: For the safety of conventioners, as well as a means to alleviate pedestrian congestion on sidewalks and crosswalks, the concepts of pedestrian bridges over the Ala Wai Canal, as well as pedestrian overpasses to access Ala Moana Center need to be addressed in feasibility studies. Massive numbers of people trying to cross streets to get to the Ala Moana Center would be hazardous.

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III. A Systematized Approach is needed to explore governmental responsibilities as well as Funding Sources from City or State revenues, City-State partnerships or Public/Private ventures for related projects of renovation and revitalization that are deemed necessary for the successful operation of the Hawaii Convention Center. The feasibility of "A Friends of the Hawaii Convention Center" could be considered and explored to be comprised of private businesses and organizations as well as individuals to provide additional support for the success of the Convention Center.

IV. The Waikiki Special District Revisions and the Waikiki Master Planning process need to be compatible with and not affect the Convention Center impacts, especially, traffic congestion. New proposals for development in Waikiki need to be regulated in their massiveness and densities.

A "Hawaiian Sense of Place" should be incorporated in the Waikiki Special District Revisions to complement the requirements for the Convention Center project. Future proposals for Waikiki developments should not be permitted to infringe into the residential districts.

V. The impacts of conventioners on The Bus need to be considered and evaluated by the Public Transit Authority. Waikiki residents, such as myself depend on The Bus to get to and from our jobs. The #2 buses on Kuhio as well as all city buses which pass by Atkinson Drive could be adversely affected, if there is excessive use by conventioners.

There needs to be a coordinated effort to incorporate the convention shuttle, the proposed Waikiki people mover and other modes of transportation. Special incentives may be needed for the conventioner to choose the shuttle and proposed Waikiki people mover. The independent conventioner may prefer to use The Bus for various reasons.

VI. A First Aid/Emergency Facility needs to be incorporated within the convention center site for the welfare of the conventioners. The facility could be staffed by a private or public/private partnership of medical personnel, possibly a private group, such as, "Doctors on Call" or a cooperative venture of the University of Hawaii Medical School with Straub Clinic & Hospital or Queen's Medical Center. The feasibility of a helicopter pad on the roof of the convention center should be considered for emergency purposes.

Thank you for the opportunity to provide input. I would appreciate a copy of the Final Environmental Impact Statement for the Hawaii Convention Center as I'm highly interested in the success of this project and continue to wish to be informed.

Sincerely,

Anita Benfatti

Anita Benfatti
Waikiki Resident



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Anita Benfatti
430 Kaiolu Street, #409
Honolulu, Hawaii 96815

Dear Ms. Benfatti:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 25, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

- I. We agree with your comment that the EIS traffic study needs to relate with the City's Waikiki Regional Traffic Impact Plan. The EIS traffic study identifies a number of planned roadway improvements and recommended operational traffic improvements as a means to mitigate the convention center traffic impacts. The Waikiki Regional Traffic Impact Plan is intended to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). The State Convention Center Authority (CCA) has participated in a number of meetings with the City Department of Transportation Services regarding the two studies, wherein it was agreed that the City would incorporate the traffic data from the convention center's traffic study into its regional study. In addition, the EIS traffic study has been expanded to include a 2005 traffic analysis using the City's growth projections. Further, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.
- II. Based on the analysis of pedestrian access in the EIS traffic study, no additional pedestrian bridges, pedestrian overpasses, or bridge widenings are necessary for the convention center project. We agree, however, that a future pedestrian bridge at Lipeepe Street or a pedestrian overpass across Atkinson Drive to Ala Moana

Ms. Anita Benfatti
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Center/Ala Moana Hotel could provide better pedestrian access to the convention center. Also, because they involve historic sites (Ala Wai Canal) and public lands, any development proposal affecting them would be subject to the provisions of Chapter 343, Hawaii Revised Statutes (Hawaii EIS law) and would be reviewed as a separate action.

- III. Your comment that a systemized approach is needed to explore governmental responsibilities as well as funding sources from City or State revenues or partnerships, or public/private ventures for related renovation and revitalization projects deemed necessary for the successful operation of the convention center is well taken. We further acknowledge your suggestion that the feasibility of "A Friends of the Hawai'i Convention Center" to be comprised of private businesses and organizations, as well as individuals, could be considered to provide additional support for the success of the Center. The Hawaii Convention Center Park Council has the beginnings of such an organization and should be encouraged to continue in the role you suggest as the Center moves through the construction and into the operational phases.
- IV. We acknowledge your comment that the Waikiki Special District revisions and the Waikiki Master Plan process need to be compatible with the convention center, especially with respect to traffic congestion. The Waikiki Master Plan recognizes the development of the convention center at the Aloha Motors site. Likewise, the EIS recognizes that although the convention center project site is not part of the Waikiki Master Plan area, several aspects of the Plan may impact the Center, including the Plan's proposed traffic and transportation improvements. As indicated in our response no. 1, the convention center's traffic study is being coordinated with the City's Waikiki Regional Traffic Impact Plan. Your suggestions regarding regulation of new proposals for development in Waikiki in terms of massiveness and densities, incorporation of a "Hawaiian sense of place" in the Waikiki Special District revisions to complement the convention center project, and prohibition of infringement of future Waikiki developments into residential districts are acknowledged but are beyond the CCA's control.

Ms. Anita Benfatti
July 17, 1995
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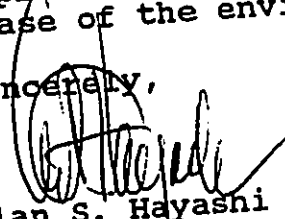
- V. We concur that the impacts of conventioners on TheBus need to be considered and evaluated by the City's Honolulu Public Transit Authority. The analysis of Oahu visitor conventioners on TheBus services (Route 2 and combined Route 2/Ala Moana Boulevard) in the EIS traffic study indicates that TheBus could not accommodate the additional riders without adding more bus capacity, either more vehicles, or use of higher-capacity articulated buses. Accordingly, the EIS traffic study recommends that mid-size and large conventions should stress the use of special convention shuttle services, and that a convenient system of shuttle buses should be provided between the hotels and the convention center. Convention literature should promote use of such systems. The traffic study also considers the City's proposed Waikiki people mover system as a potential long-range alternative to augmenting public transit capacity between Waikiki and the convention center.
- VI. A first aid station will be provided on the exhibition hall level of the convention center facility. Staffing requirements for the first aid station will be determined by the operator of the convention center. While the design of the convention center precludes accommodation of a helicopter pad on the roof of the facility, it can be adequately serviced by existing medical facilities in the area. Ambulance dispatch through the 911 system is available within the required 8-minute response time from a number of medical facilities in the area, including Queen's Medical Center, the Kaiser Clinic, St. Francis Medical Center, Kapiolani Hospital, and several private ambulance services.

Unfortunately, the size and cost of reproducing and mailing the Final EIS makes it impossible to send to all interested individuals and organizations. However, copies of the Final EIS document will be available in public libraries and many State and County agencies.

Ms. Anita Benfatti
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Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 13, 1995

Convention Center Authority
The State of Hawaii
1833 Kalakaua Suite 800
Honolulu, Hawaii 96815

MAR 17 1995

Dear Mr. Hayashi,

After attending many, many, many meetings regarding a Convention Center at the old Aloha Motor site for past 7 years, it now looks as if many of our concerns are indeed legitimate! The plan looks great from CCA's viewpoint, but it certainly does not look as if the immediate neighborhood will be impacted in any favorable way. You can say all you want about property values going up, indeed it could end up being just the opposite! And certainly during the construction period that will be true. When you are in your 70's, certain conditions might come up where you HAVE to sell your condo, no matter how the market is at that time.

We had the foresight to buy in Summer Palace five years before we could retire and come here to live, for what we hoped would be the rest of our lives. We have been here over 11 years now. It seems very suspicious to us that of all the available sites in Honolulu for a Convention Center that both the City and State politicians always have favored only this site. Nevertheless, we are stuck with this decision. We realize the site will not stay vacant forever, and that whatever is put in would create additional traffic and perhaps noise, but not to the extent a Convention Center will. It will bring all the Waikiki problems (prostitutes, drugs, etc) to our very door step. Already it is starting to be costly to Summer Palace residents, in that we have to get more security into place. And I am sure this is just the start!

No one has ever really answered what will happen to our swimming pool and recreation area on the 3rd floor during construction, not to mention our lack of privacy forever after. It is on same level as Convention Center parking garage.

Summer Palace is not an air conditioned building, and altho most units do have a window air conditioner on the lanai, there is no way the whole apartment can be closed up to shut out at least some of the worst dirt and noise.

No reasonable explanation has ever been given as to why we have to give up the side walk on our side of the street. It is hazardous enough for residents to walk the streets now, without adding to the hazards.

I want to again say, "walk the walk" and see what we will have to be contending with when the construction is going on and after. My husband had such a good idea of 2 lanes dedicated

to Convention Center traffic and 2 lanes for the residents. The light would have to be adjusted so that there could be left turns and right turns of course. If you don't think this is feasible then provide us with a way to get out into Atkinson Dr. without going back on Kahakai Dr. See, we've given you two solutions, your choice! Of course either the Union Hall or the small businesses would have to be sacrificed for such an outlet to occur. But since the unions will be among the biggest benefactors of the Convention Center, and are so in favor of it, let them make a few sacrifices too, such as relocating. We all saw what happened to the VFW when someone bought their land! And above all, get this in place before construction starts, rather than after!

When I was growing up we lived within a block of a big amusement park, and because they knew this created noise and traffic in the area, they always gave season passes to the near by neighbors and this helped to hold down complaints. Isn't there some thing you could do for us in Summer Palace and other nearby condos to make us more tolerant of this huge nuisance that will be built in our midst!

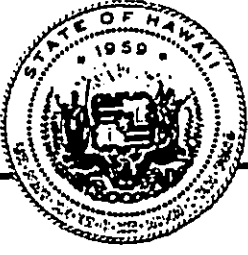
Specifically, it would be great if our swimming pool area could be enclosed as soon as construction starts. Quite a few in our building have added sliding doors to the lanai area, if the present doors are left up, it would mean double enclosure, and surely would cut down on the dirt and noise. It would certainly make residents feel better about the many, many inconveniences we will have to put up with. After all, both CCA and everyone in Hawaii would like to see the Aloha spirit extended to visitors/conventioners, but it is hard to hold on to it, when resentment is felt. We still feel we would like to be good neighbors, is there any chance of that?

Sincerely,

Nora Boone

Nora Boone
1848 Kahakai Dr. #1805
Honolulu, Hi. 96814

cc: Governor Cayetano
Wilson Okamoto & Associates
Office of Environmental Quality Control
Senator Carol Fukunaga
Councilman Andy Mirikitani
Councilman Duke Bainum



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Nora Boone
1848 Kahakai Drive, #1805
Honolulu, Hawaii 96814

Dear Ms. Boone:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 13, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Your concerns regarding the impacts of the convention center on the immediate neighborhood are understandable and the Convention Center Authority is trying its best to be a good neighbor. Although the construction period will involve the most noticeable impacts on the adjacent residences, once the building is enclosed, these impacts will be significantly reduced. Thus, any adverse impacts on property values should only be reflected during this time and not for the entire length of the construction period.

You indicate that of all the available sites in Honolulu for a convention center, City and State politicians have always favored the Aloha Motors site. However, we note that several studies which analyzed a number of potential sites for a convention center have been conducted over the years. In addition to the primary consideration of its proximity to a high inventory of hotel rooms and commercial/retail businesses, the vacant status and single ownership of the Aloha Motors site further enhanced its development potential since it would not displace any existing uses. You also indicate that whatever use is put on the project site would create additional traffic and noise, but not to the extent that a convention center will. However, the City and County zoning for the project site would have allowed a greater density development (i.e., mixture of commercial and high-rise residential uses) and 350-foot high buildings which could have resulted in greater impacts on traffic, noise, and not to mention views in the area. Unlike a convention center which will have many "dark days" for the set-up/take-down of convention exhibits, other potential developments of the site

Ms. Nora Boone
July 17, 1995
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would have likely resulted in greater daily traffic impacts and associated noise.

You also indicate that the convention center will bring all the Waikiki problems to the doorstep of your condominium. It is not expected that the convention center will significantly increase the potential of crime in the immediate area, nor is a change in the nature of crime (increased drug activities or prostitution) anticipated to occur. According to the convention center manager of The BC Pavilion Corporation in Vancouver, British Columbia, convention centers, such as those in Los Angeles, New Orleans, Seattle, New York, and San Diego, have tended to revitalize the neighboring community and increased public safety. Although the prospect of a large number of people coming to a facility may result in increased opportunities for crime, the proposed plan to bus the majority of visiting conventioners to the Hawai'i Convention Center facility will be a controlling factor for the potential of increased crime. Furthermore, it is noted that convention centers tend to attract more of the professionals, whereas activities such as prostitution tend to be more evident with other tourists. Also, the Hawai'i Convention Center facility is equipped to provide 24-hour security.

Several dust control measures during the construction period will be implemented by the design/builder. These measures include placing a gravel working surface over the entire site; frequently watering exposed dry soil areas, particularly heavily travelled areas within the site; covering trucks hauling materials that could generate significant amounts of dust in transit to or from the site; installing landscaping as soon as possible on completed open areas; and, if necessary to comply with DOH rules, erecting dust screens to protect nearby low-level properties.

As part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may otherwise be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace. We note that the elevation of the convention center's parking

Ms. Nora Boone
July 17, 1995
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garage is approximately 14 feet higher than the pool and recreation deck of The Summer Palace.

You expressed concern about the inability to close up the entire apartment unit so as to shut out the dirt and noise during construction of the convention center. Our response in the previous paragraph identifies dust control measures which would be taken by the on-site contractor. As indicated in the EIS noise study, noise impacts during the construction period are unavoidable, but temporary. Likewise, it is indicated that noise levels, especially from pile driving activities, may be degraded to unacceptable levels during construction. Construction operations will adhere to the State Department of Health (DOH) noise standards which imposes construction curfew times. For example, the construction curfew restricts pile driving activities (i.e., greater than 95 decibels) to the period between 9:00 AM and 5:30 PM on weekdays only. Within the project site, pre-drilling through the upper coral layer will be provided for piles to be set in the lower coral layer. This will reduce noise by reducing the number of blows which would otherwise be required to penetrate the upper coral layer. Construction barriers up to 16 feet high along the Kahakai Drive project frontage will also be erected to further reduce construction noise.

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead, landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive, by the Atkinson Plaza condominium, and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

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In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

We acknowledge your husband's suggestion of alternatively dedicating the lanes on Kahakai Drive for the convention center and residential traffic, respectively. However, this proposed alternative would require separate or additional traffic signal phases at the Atkinson Drive/Kahakai Drive intersection, thereby increasing the overall vehicular delay of the intersection. On the other hand, the traffic signal planned for the convention center at this intersection would provide a more efficient operation and keep vehicular delay at the intersection to a minimum. The proposed design of Kahakai Drive, with its increased traffic laneage and installation of traffic signals, is intended to facilitate vehicular ingress/egress for motorists travelling to the convention center, as well as the adjacent residential area. The EIS traffic study demonstrates that the intersection of Atkinson Drive/Kahakai Drive would operate at acceptable levels with the proposed roadway improvements. Another vehicular access out of Kahakai Drive as you suggest is not required nor warranted.

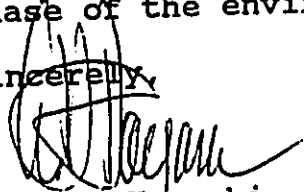
To the extent feasible, the convention center will mitigate most impacts resulting from the construction and operation of the Center. As previously indicated, the on-site contractor will undertake measures to reduce dust and noise impacts during construction of the convention center. However, neither the design/builder, nor the CCA are considering any compensatory measures beyond the mitigation identified in the EIS which are directly related to a potential impact.

We are appreciative of your efforts to be good neighbors. Likewise, the CCA has always strived to be a good neighbor and will continue to do so in addressing concerns which may arise during development of the convention center. We would also like to inform you that the project's design/builder, Nordic/PCL, will establish a hotline to respond to concerns which may arise during the convention center's construction phase.

Ms. Nora Boone
July 17, 1995
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Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Job P. Brown
509 University Ave., Apt. 804
Honolulu, Hawaii 96826-5008
Contact No. (808) 944-0783

March 23, 1995

RECEIVED
MAR 28 1995

ATTN: Gary L. Gill
The State of Hawaii
Office of Environmental Quality Control
220 South King Street., 4th Floor
Honolulu, Hawaii 96813

WILSON OKAMOTO & ASSOCIATES

Dear Mr. Gill:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

I am writing today to offer my comment(s)/concern(s) regarding the Hawai'i Convention Center's Draft Environmental Impact Statement based on my full review of the entire document. The comment(s)/Concern(s) I will be raising are my own, and may not reflect or coincide with those of my fellow McCully/Moiliili Neighborhood Board 8 members. I have the following Comment(s)/Concerns:

1) Page 2-20, Fig. 2-7: I am extremely concerned with the extreme lack of "Handicapped" designated Parking stalls. As it stands now there are only 10 Handicapped designated stalls which accounts for a little over 1% (8) of the 800 on-site parking stalls are being set aside for Handicapped User's of the Facility. I personally would like to see the number of "Handicapped" designated stalls approach the neighborhood of 5% to 10% of the 800 total on-site parking stalls available (the number of stalls would be between 40 and 80 stalls for Handicapped Use). I would like to see them placed in an area of the "drop off" zones that are easily accessible to Handicapped equipped modes of transportation to/from the Parking deck to the other facilities of the convention center. I could also live with fewer overall "on-site" parking stall as long as S.E.A.T. Planners, Inc., assists with the overall (if possible) running of the Shuttle Bus Service(s) for the Convention Center. I also do not want to see the McCully/Moiliili Neighborhood become the "Peripheral Parking Lot" for the Convention Center as we don't even have enough on-street parking for our own residents, let alone any extra parking for outside uses.

2) Page 5-5, Paragraph 2: I am now quite doubtful that a 14,000 attendees Convention can be designated as "The Worst Case Scenario" when it was reported by the media last week that the H.V.B which is marketing the yet to

be built Convention Center is trying to lure the 25,000 attendee Lions International Convention to the center. And yet there is no mention anywhere in the D.E.I.S regarding a careful analysis (Traffic or Otherwise) of a event of this size, so I would like this to be fully addressed in the Final Environmental Impact Statement of the Hawai'i Convention Center.

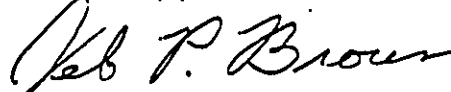
3) Page 5-38, Paragraph 5.8 Fire Protection: I raise the following concern as I am not sure if all of the proper parties to this matter are aware of this fact and my strong opposition to it: The City and County of Honolulu Fire Department intends to move from the McCully/Moiliili Fire Station No. 29 "Ladder Company #29" to the City of Kapolei. The Reasoning/explanation is that there are 3 Fire Stations nearby which supposedly provide "Overlapping Services". I do not go along with this in that I believe that the McCully/Moiliili Neighborhood is entitled to its own Engine and Ladder Companies being that we are a mix of both "High-Rise and Low-Rise" buildings which justifies the need for our own current Fire Companies remaining in place with no changes or disruptions in service. It states that the McCully/Moiliili Fire Station (Engine and Ladder Companies) are to "provide "Back-up" firefighting service to the Convention Center which again justifies the "Non-removal" of the Ladder Company from its current location.

4) Page 2-8, Fig. 2-3, Page 5-29, Appendix I, Pages 5-9 to 10: I raise the following concern regarding a (Possible) Water Transportation System, as there seems to be many contradictions throughout the D.E.I.S regarding this. The D.E.I.S states there is no proposed construction to take place on/around the canal other than the Ala Wai Promenade, and yet figure 2-3 depicts what could be docks for such a transportation system. If a Water Transportation System for the Convention Center is envisioned I would like to see this addressed in the Final Environmental Impact Statement, and I would like the current Recreational and Organized Teams/Canoe Clubs along with the McCully/Moiliili Neighborhood Board consulted regarding this so as to ensure that there are no conflicts between these differing uses of the Ala Wai Canal and its narrow waterway.

I would like to thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Hawai'i Convention Center I will reserve judgement regarding my support/disapproval of the project until such time that I may review the Final Environmental Impact Statement. Should you have any questions or need any further information regarding this matter "Please feel free to contact me."

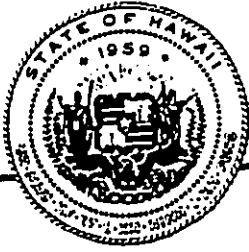
I would like to Thank You for your Time, Cooperation, and Assistance in regards to this matter.

Sincerely,



Jeb P. Brown, Chairperson
McCully/Moiliili Neighborhood Bd B

cc: Mr. Alan S. Hayasi, Convention Center Authority
Mr. Earl K. Matsukawa, Wilson Okamoto & Associates, Inc.
Mr. Bart Aronoff, Planning & Traffic Chair Bd. B



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Jeb P. Brown
509 University Avenue, Apt. 804
Honolulu, Hawaii 96826

Dear Mr. Brown:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawai'i
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. Currently, there are 16 designated handicapped parking stalls in the convention center parking garage. According to the Americans with Disabilities Act (ADA) guidelines, the required minimum number of accessible parking spaces is 2 percent of the total number of spaces provided (i.e., 2 percent of 800 stalls). The location of the handicapped stalls within the parking garage is based on the shortest accessible route of travel to the elevators, escalators and primary entrances to all major functions of the convention center facility.

In accordance with your concerns regarding the limited amount of on-street parking in the McCully/Moiliili neighborhood, the EIS traffic study identifies a number of parking alternatives which could become part of an overall transportation management plan by the convention center's transportation coordinator. It is acknowledged that there may be events that would have a higher proportion of local resident attendees driving to the convention center, or would require additional temporary and part-time employees, or trade show exhibitors who may require special parking needs. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include use of existing outlying parking facilities that may be available during the event; arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking; and, issuance of public bus passes to convention center employees. In spite of such measures, on-street parking

Mr. Jeb P. Brown
July 17, 1995
Page 2

is available to the general public and, inevitably, some people will choose to seek out such parking, creating additional competition for the limited number of parking spaces available.

2. As indicated in the EIS traffic study, the State Convention Center Authority (CCA) intends that the primary users of the convention center will be national and international conventions, trade shows, exhibitions, and meetings. Such events are expected to attract from 2,000 to 14,000 attendees during the two- to four-day duration typical for such events. Therefore, the 14,000-person analysis was used to represent a "worst-case" event as a basis for identifying potential traffic and transportation impacts and mitigative measures.

The Lions International Convention you mention, although bringing up to 25,000 people to the State, is expected to generate 10,000 to 12,000 delegates who will actually attend the convention center meetings. This fits within the 10,000- and 14,000-person range of the traffic analyses conducted for the EIS.

According to the CCA, it would be rare for the convention center to host conventions much larger than 14,000 persons, considering the size of the exhibition hall and the number of hotel rooms in Waikiki. For example, the 200,000-square foot exhibit hall could accommodate a maximum of about 20,000 persons, provided the entire exhibit hall is used and there are no exhibits. However, it is extremely rare that conventions would not have exhibits. Further, for the very large conventions (i.e., 30,000 persons), provisions are never made to accommodate the total number of registered delegates at the convention center on any one day due to facility constraints. Rather, various concurrent programs are provided, such as conferences, exhibits, and tours of the town when attendees are scheduled to rotate among these various activities over the duration of the convention.

We emphasize that the EIS traffic study analyzes the traffic and transportation impacts of a range of scenarios which could reasonably occur at the convention center. It is not feasible or possible to address every conceivable situation or scenario at the EIS level of analysis. When the convention center becomes

Mr. Jeb P. Brown
July 17, 1995
Page 3

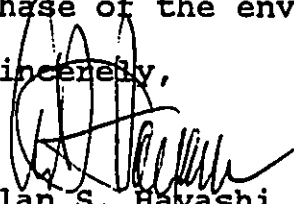
operational, its transportation coordinator would be responsible for preparing transportation management plans, as deemed necessary, for various events. These plans could include contingencies to address unique conditions such as events at nearby venues and will be coordinated with the City Department of Transportation Services.

3. According to the City Fire Department, the current plan is to relocate the ladder truck from the McCully Fire Station to the Kapolei Fire Station in June or July 1995. In support of this decision, the Fire Department indicates that appropriate fire coverage will be provided for the McCully/Moiliili area and response procedures will be adjusted to accommodate the relocation of the ladder truck. The discussion of fire protection will be revised in the social impact assessment report and the Final EIS document to reflect the relocation of the ladder truck.
4. We wish to clarify that Figure 2-3 on page 2-8 of the Draft EIS does not depict boat docks along the Ala Wai Canal. As indicated in the EIS traffic study and the Draft EIS document, current convention center plans do not include any improvements associated with using the Ala Wai Canal as a waterborne avenue of approach. Several concerns need to be resolved before pursuing such a concept, including potential navigational and recreational conflicts with other groups and individuals who use the canal for boating and canoeing. Certainly, the proposed convention center design would not preclude such a use of the Ala Wai Canal in the future.

Mr. Jeb P. Brown
July 17, 1995
Page 4

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

MAR 25 10 POST

March 24, 1995

To: Whom It May Concern

Re: Response to the Draft of the Environmental Impact Statement for the Hawaii Convention Center.

After attending the public hearing of March 9, 1995, it has become abundantly clear that neither the State, the Convention Center Authority, nor the contracting company employed to build the proposed convention center at the Aloha Motors site has provided for the mitigating measures necessary for this project to be feasible.

We are particularly concerned about the following impacts:

1) We learned there could be toxic/hazardous waste still undiscovered on the property. While the contractors did not seem to think this was a problem, we feel that the possibility of drilling into coral to find additional PCP is disconcerting, to say the least. Random testing was done, but the three sites where the piles will be driven was not tested (and they said will not be tested). Why not?

2) Though ingress and egress at Kahakai Drive have been provided for, the residents of Atkinson Plaza will not be able to get onto Atkinson Drive if there is a traffic light where they currently planned it at Kahakai Drive. At the meeting, they said they would have to ask the city about this difficulty. Why has the traffic issue not been adequately addressed before now?

3) The noise from pile driving, from general construction, and later from the enormous number of buses and cars entering and exiting the site when it is finished will present serious hazards for children, the elderly, and animals who will be at home all day in the surrounding condos. These vehicles will also add considerably to the amount of air pollution in this area.

We feel that this project contributes significantly to the already existing strained environmental situation near our respective buildings. It also impacts the adjacent Ala Wai Canal residents. We believe the proposed convention center is ill-placed, ill-planned, and ill-advised.

Neighbors of the PROPOSED Convention Center

Patricia Card
Summer Palace - 1848 Kahakai Drive #1603

Patricia Card

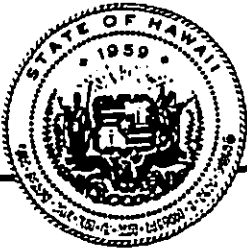
Janet Leister
Atkinson Plaza - 475 Atkinson Drive #1204

Janet Leister

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

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RECEIVED



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Patricia Card
1848 Kahakai Drive #1603
Honolulu, Hawaii 96814

Dear Ms. Card:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We provide the following responses to address the concerns you have regarding provision of mitigation measures for the convention center project pursuant to the March 9, 1995 meeting for residents of Kahakai Drive.

1. We wish to clarify information regarding hazardous waste materials at the project site which may have been misconstrued at the March 9, 1995 meeting. The previous property owners of the project site have studied and removed/disposed of known hazardous waste materials on the site. In March 1992, the San Francisco (Region IX) office of the Environmental Protection Agency (EPA) recommended that "no further remedial action" was necessary under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). In April 1993, the State Department of Health issued a letter stating that based on their review and evaluation, "no further actions are necessary for the contaminants found in the test areas of the site." Because the potential of encountering presently unknown contaminated soils and/or groundwater during construction exists, however, the design/builder will prepare a hazardous materials contingency plan to assure that all State and Federal requirements for remediation are complied with in the event that any further contamination is discovered during construction.
2. Regarding the matter of the Atkinson Plaza driveway as discussed at the March 9, 1995 meeting, please be apprised that the City and County Department of Transportation Services (DTS) is currently reviewing the roadway construction plans for the convention center project. Upon review, DTS will determine the appropriate

Ms. Patricia Card
July 17, 1995
Page 2

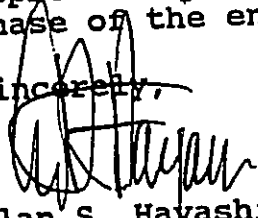
traffic operational measures which may be required in the vicinity of the Atkinson Plaza driveway.

3. The convention center EIS addresses the noise impacts resulting from the Center's construction and operation, as well as air quality impacts. Specifically, separate noise and air quality studies were conducted for the EIS which address the respective potential impacts resulting from the convention center and identify specific mitigation measures to reduce or minimize these impacts.

We would like to note that the EIS addresses the impacts of the convention center on the adjacent Ala Wai Canal residents. Your opinion that the project contributes significantly to the existing strained environmental situation near your building, and that the convention center is ill-placed, ill-planned, and ill-advised is acknowledged. However, the project is the result of many years of planning work, and although it will never please everyone, we are confident that this site is the best one available for this facility.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

**Identical Response Letter
Sent to**

Janet Leister

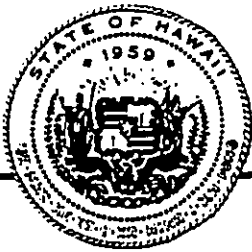
Convention Center Authority

COPY

I HAVE BE LIVING IN HAWAII FOR OVER 20 YEARS
I CAME FROM A BIG CITY, HOULI KOUHI TO BE EXACT.
YOU SHOULD CUT AN THIS RED TAPE AND GO
AHEAD WITH THIS PROJECT. SO MANY BIG PROJECT
GOT DELAYED BECAUSE OF ALL THIS SPECIAL INTEREST
GROUP. IT WILL GET BUILT SOON OR LATER ANY
WAY, IT WILL COST LESS IF WE DO IT NOW
AND WE MIGHT MAKE SOME MONEY NOW.
THIS ISLAND IS A LOT COST TO KEEP IT THE
WAY A LOT OF YOU WANT IT TO BE. ALL
THIS, NOISE, SAND, TRAFFIC WILL BE
THERE, WITH OR WITHOUT IT, THERE WERE
NEVER PROOF ON ALL THIS PROBLEMS, YOU
NEVER GOING TO KNOW UNTILL IT IS BUILT.
BUILD IT SOFT AND WITH GO FOR SIGHT, IT
WILL WORK.

DAVID CHAN, CONTRACTOR, RESTAURANT OWNER
AND SURFER

DAVID CHAN



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. David Chan
1120 Maunakea Street
Honolulu, Hawaii 96817

Dear Mr. Chan:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to to your letter commenting on the subject Draft EIS. We acknowledge your supportive comments encouraging development of the convention center.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Connie Conrad
1600 Ala Moana Blvd.
Penthouse 3900, Yacht Harbor Towers
Honolulu, HI 96814
Telephone 949-3280

RECEIVED
MAR 28 1995

March 24, 1995

WILSON OKAMOTO & ASSOC., INC

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Earle Matsukawa
WILSON OKAMOTO & ASSOC., INC.
1907 S. Beretania St.
Honolulu, HI 96826

Dear Mr. Matsukawa:

Enclosed are my views and concerns regarding the Hawaii Convention Center which I have addressed to Governor Ben Cayetano (letter attached) hoping they make a worthwhile and meaningful contribution.

I will appreciate your giving the attached your close scrutiny and your response to my concerns will be appreciated. Mahalo.

Sincerely,


Connie Conrad

P.S. -- Being a 60 year resident of Hawaii and Waikiki and in my earlier years a partner in the Hawaii architectural firm of Dahl and Conrad and having designed 200 projects (homes, apartments, and commercial work), later I became one of Hawaii's largest retail jewelers, Security Diamond at Ala Moana Center.

Connie Conrad
1600 Ala Moana Blvd.
Penthouse 3900, Yacht Harbor Towers
Honolulu, HI 96814
Telephone 949-3280

March 24, 1995

The Honorable Benjamin Cayetano
Governor
State of Hawaii
Capital Office Building
Honolulu, HI 96813

SUBJECT: State Budget Crisis and Convention Center Traffic Crisis

Dear Governor:

Unquestionably, you and your team have put in long countless hours in dealing with the financial crises and dilemma you recently inherited. Since necessity is the mother of invention, changes will always take place. As the French say, "change is the most permanent thing in the world".

Accordingly, you could choose to immediately reduce the State's \$250 million dollar budget crisis by \$136 million dollars, a 50% reduction of the fiscal crisis the State is plagued by, and here is how.

You could simply use the same excellent prize-winning design of the architects for our Hawaii Convention Center, but locate it on magnificent ocean-front land that our State now owns at Fort Armstrong. There is over 30 acres at this location instead of only 9-1/2 acres at the present site which allows for no expansion and growth as well as inadequate parking and super congestion.

We then can reduce the \$350 million dollar cost of this huge project to only 200 million dollars without disturbing the splendid design of the Hawaii Convention Center. This is a huge savings of 75% of the cost of the convention center building itself, which will be the largest and most costly building ever built by our State.

Only 13 months after the State paid 136 million dollars for the purchase of the Aloha Motors site for a convention center, we now find ourself faced with a 250 million dollar or more financial deficit. In your words, "*..No Governor, no Legislature since statehood has faced a financial crisis of the magnitude and severity that we face today.*"

Accordingly, locate the convention center at land now owned by the State at Fort Armstrong which opens to Honolulu's glorious harbor and no cash outlay would be

required nor materially impact the progress achieved to date by the architects, as the same design could be used, only more magnificently. No other convention center site can offer nor compete with the overall advantages and natural beauty the Fort Armstrong-Honolulu Harbor site possesses ... It will be a Hawaii landmark recognized around the world as word of the Hawaii Convention Center spreads. It will become a prestigious and most sought-after site for national and international gatherings.

By contrast, the present site that has not passed its Environmental Impact Statement yet, will be plagued by ever-growing vehicular traffic congestion, gridlock, noise, and annually 35,000 hauling trucks surrounded by a forest of 30-story condominium towers and no Hawaiian sense of place the Hawaii Convention Center Authority claimed it would feature.

To make this all more vivid and understandable, what follows is an eye opener. I saw a preview in real life of traffic congestion and gridlock the Hawaii Convention Center will generate when I attended the last 4th of July celebration on a Sunday evening at Ala Moana Center that closed early at 5 p.m. for this event. By 7:30 p.m., 6,000 people gathered at the upper makai parking area for this show. After it ended, the spectacular fireworks event at Magic Island commenced where approximately 14,000 people had gathered.

When this half-hour event ended, a total of approximately 20,000 people left these two areas and auto traffic at Ala Moana Boulevard and Atkinson became gridlocked. When the traffic signal at this intersection turned green (go), 34 cars in Ala Moana Boulevard traffic going ewa crossed the wide Atkinson intersection, but 12 cars remained in the Atkinson intersection as traffic beyond was stalled. This also prevented the heavy traffic leaving the park road and the Atkinson traffic from moving forward (makai) when the "go" signal appeared, and no traffic could turn left or right. Three police officers just struggled.

Then on Atkinson vehicles were leaving Ala Moana Center making left and right turns, slowing traffic substantially. This center and its hotel parks 8,300 cars. It took 1-1/3 hours for traffic to normalize, as a total of 16,000 people or more tried to return home at 10 p.m. to after 11 p.m. Had such traffic occurred in the morning or early evening rush hours when 16,000 or more conventioners were arriving or departing to or from their Waikiki hotels, it would put collectively 32,000 people into bad peak hour traffic. Also this 4th of July traffic gridlock did not have to deal with trucking activity to or from the convention center such as the 50 to 75 large container trucks 60 feet long would be making and the 100 smaller trucks needed. In one year this adds over 30,000 trucking trips into our boulevard traffic.

How do we deal with another critical situation? If a convention of only 7,000 people is taking place and simultaneously 9,000 island residents and tourists are attending a special entertainment event there also, 16,000 people. However, island residents need parking for their 3,000 cars, and there will be no such parking. While this center parks 800 cars, it will be consumed by the conventioners and 325 employees.

A quick review of auto parking in this area follows: the Ala Moana Center plus the 40 story Ala Moana Hotel with 1,200 rooms together park 8,400 vehicles. Then

condominiums, hotels, office buildings, and Ala Moana Park have in total parking for 7,000 vehicles. This is parking in total for 15,400 vehicles.

Obviously this is only part of the parking needed. As time passes, it becomes increasingly worse as more buildings are built in this area. Also this 350 million dollar Hawaii Convention Center must serve us for 50 years or more yet mind-boggling traffic in this area will be self-defeating to the Hawaii Convention Center because of increased congestion, to tourism and to our life style.

Only two weeks ago the 10 p.m. TV news announced two major department stores (Nordstroms and Saks) as being key department stores for the planned new shopping center located one block from Ala Moana Center at Kapiolani Boulevard and Keeaumoku, occupying a huge city block now empty, but parking for 2,500 cars will be needed.

All of the foregoing should make us stop and think more clearly about this 350 million dollar convention center bringing 20,000 people into this commercial area and the "traffic hell" that will result, killing any Hawaiian sense of place that was the theme song of this planned Hawaii Convention Center. Worse yet, all this growing congestion (gridlock) will spread directly to Waikiki's fine hotels, impacting tourism severely and detrimentally. The outer islands will like this because it will drive conventions and visitors away from Waikiki to the excellent tropical resorts of our outer islands, and they are growing.

In addition, the agreement made with the sellers of the Aloha Motors site provides for a more than fair buyback option on their part, as reported in the 12/4/93 edition of the *Honolulu Advertiser*. Exercising this option or selling the property on the open market affords the State the opportunity to move ahead with greater competency and fiscal responsibility.

Finally, and most importantly, your action would curtail a severe cut in the jobs and public services so critical to the welfare of our community that you would otherwise be forced to make.

In light of the current Legislature's concern as to whether funds will even be available to market the convention center, it is preposterous to have spent the artificially inflated price of 136 million dollars on the purchase of the Aloha Motors site. If you can't market it, then why build it.

More so, it was entirely irresponsible for the State under the leadership of our past Governor to commit to building a convention center for 350 million dollars when it can be done more effectively and with substantially less traffic impact for around \$200 million dollars. This is a savings of \$150 million when we need it the most.

In addition to the overwhelming financial burden the purchase of the Aloha Motors site places upon us, the site offers no satisfactory opportunity to expand the convention center. We are painting ourselves into a corner which will have deeply negative financial repercussions when expansion becomes necessary.

With so many larger and more sophisticated convention facilities coming on line on the mainland and throughout Asia and the Orient, Hawaii's plan for the Aloha Motors site

is probably already obsolete because the site has dictated planning for the minimum rather than for growth. In private business this would be considered gross negligence. In a State so dependent upon its travel industry for operating revenues, it's even worse.

Hundreds of new hotels and resorts are now under construction in Mexico. This, combined with the devaluation of the peso, is going to make Mexico a vicious competitor. Expansion of convention centers is commonplace on the mainland. San Diego is now doubling the size of its prestigious waterfront facility. Overseas, Hong Kong is investing hundreds of millions of dollars to expand its facility into its harbor. MGM Grand is spending two-thirds of a billion dollars to develop a resort, convention and gambling mecca in Hainan, a tropical island off the south coast of China, and Singapore is outdoing everyone, spending over a billion dollars. This competition could seriously reduce the number of Japanese and oriental visitors Hawaii may be counting upon.

This kind of heated competition makes it mandatory for us to be efficient in our use of the revenues we raise from the hotel room tax. An extended downturn in our tourist industry or a sustained lack of growth would substantially reduce hotel room tax revenues. A prudent prioritization for the spending of these revenues would be on the facility itself and then its expansion. To put money into the purchase of land that almost costs as much as the facility itself and doesn't even allow for expansion is irresponsible and dangerous in light of our current financial crisis and the potential of a shortfall in tourist tax revenues.

Above all, however, the Aloha Motors site is located near one of Honolulu's most densely populated high rise residential areas and concrete forests - an unlikely site to create a Hawaiian sense of place. It is also adjacent to one of the largest shopping malls in the country. Ala Moana shopping center authorities say over 50,000 cars move through their facility daily. The area is already a traffic nightmare growing worse by the day, and it doesn't take a rocket scientist to understand the traffic congestion to be unleashed by having the convention center next door. For 20,000 people arriving and departing, that's a total of 40,000 people, but what about 6 years later and possibly six new hotel towers?

To contemplate the amount of bus traffic boggles the imagination. An event of 10,000 people, which should be commonplace when the center reaches operational capacity, could generate 1,000 more bus trips in the Waikiki area daily with movement from early in the morning to late in the evening. Buses only hold an average of 50 people. Therefore, they must make several round trips between their holding yards outside of Waikiki, the hotels in Waikiki and the convention center at the Aloha Motors site. It must also be remembered that each bus will be empty during one leg of every round trip into and out of Waikiki and during every trip between the hotels and the convention center.

Just imagine what would it be like with two events of 10,000 conventioners each going on simultaneously. The convention center has been deliberately designed to handle multiple events reaching a total capacity of 20,000 attendees or more every day, but Waikiki's traffic carrying capacity never was designed for this and never can be. Accordingly, a convention of 8,000 attendees could be occurring plus a local event, a show, a musical, or a business conference, etc. could be taking place at the same time. With 8,000 people attending, this would mean 16,000 people are jointly using the

convention center.

The 800 parking spaces could be filled by both the staff of 350 people and the mainland conventioners. The 8,000 local attendees for their event may have arrived in 2,500 or more autos with no place to park. Also, this means more city busses and 500 taxis may be added, all contributing to the huge traffic congestion this creates. Obviously, this example clearly brings to mind more seriously the auto parking limitations that impact this project.

Our traffic experts with their four hundred thousand dollars to spend on studies (half of which the State can't pay, so the City is picking up) must be blind if they don't already see this by now. In addition, there might be thousands of family members accompanying conventioners to each event, thereby adding to this traffic burden. Traffic congestion will permanently choke the marketability of the convention center in this location making the project the costliest white elephant in the history of our State.

You may try to deceive yourself about this problem by thinking that large numbers of conventioners will walk to the convention center. That is wishful thinking. And, anyway, the larger the number of pedestrians in the area, the slower traffic will move through all intersections. No matter how you look at it, it spells gridlock.

Finally, we must factor into this two more significant traffic realities: (1) Normal traffic around the Aloha Motors site will be much worse as the impact of 15,000 more vehicles on Oahu each year takes its toll. That's about 60,000 more vehicles by the time the convention center opens. Then in four more years, the total increase is 120,000 vehicles. (2) In addition to the overwhelming amount of convention bus traffic, there will also be hundreds of trucks carrying 40 ft. long containers, vans, taxis and automobiles serving the convention center and its tenants day and night. It is imperative that we do not impose this congestion on Waikiki.

To do otherwise will plague this most costly project very adversely causing conventions to go elsewhere as well as negatively impacting the convention business we have established over the years.

The chairman of the Hawaii Convention Center Authority stated on the Olelo TV Sunday evening program (February 2, 1995) "if 14,000 people attend the convention center facility, the ewa bound traffic on Kapiolani Boulevard that makes a left turn into Atkinson Boulevard will increase traffic by seven (7) percent at this intersection by 1998. In terms of vehicles, this is an added many thousands of autos including service vehicles arriving and departing. Yet we heard nothing about traffic going ewa on Kapiolani Boulevard and then turning left going makai into Atkinson Boulevard. This left turn is presently prohibited at certain peak traffic hours. How will this be dealt with?

Also, it was explained conventions will only occur 197 days of an entire year, leaving 168 days or evenings for a variety of public events, musicals, plays, shows and other special gatherings for both island residents and tourists. This means the Hawaii convention center may be used 70% of the year for conventions and 30% of the time for entertainment and special events other than conventions.

The Hawaii convention center is designed for a fourth floor addition to be built above and over the beautiful upper open garden terrace area. This later addition will increase total capacity to 20,000 people. Also the cost of the center will be much greater, if I understand this correctly.

Prior to this, I stated many of the advantages of the larger Fort Armstrong site at little or no land cost to the taxpayers for it. At this point I wish to emphasize how this larger site protects the present and ultimate design of the convention center.

Here is how with a larger land area like Fort Armstrong the fourth floor later addition can be eliminated and instead be later located at ground level in a beautiful garden setting yet linked to the main exhibition hall providing easy pedestrian entry as well for heavy exhibition materials.

While this ground level pavillion and its tropical garden patio adds its special charm, it also preserves the beautiful convention center design of the architects by eliminating the need for a later fourth floor addition that would destroy the charm of the architect's beautiful open roof garden with its colorful tropical landscaping.

I am fully aware of the tremendous effort, skill and ability that has been put forth into this project by all concerned, particularly the Convention Center Authority, but we must realize this noble project must endure and fulfill our needs and be "successful over the next half a century", and the taxpayers of our State are getting the finest convention center in the best location for the best price.

I honestly can't say the taxpayers are getting this. How can they when this project is inland from our magnificent ocean shore line. Our former administration chose to not locate this great landmark of distinction upon our ocean shore line. Fortunately we can regain this as a magnificent jewel on our colorful shoreline free of hundreds of concrete towers. Then direct and easy access by off shore catamarans carrying 150 or even 400 passenger makes this a pleasurable and memorable experience. Only four feet of water draft is needed, thus not disturbing our coral reefs.

Most exciting, the Hawaii Convention Center site at Fort Armstrong opening to Honolulu Harbor is then linked to Waikiki and in turn our important financial and business center next to our state and city government buildings as well as Iolani Palace.

Importantly, there is the new Aloha Tower Shopping Center, a hundred million dollar development on the Honolulu waterfront with its 200 stores and 10 restaurants. Yet there is more ...

Ultimately as the years pass, the Hawaiian Electric plant that occupies two large blocks of this treasured area may choose to relocate, then this site could become a magnificent hotel tower in a park setting open to our harbor and ocean views, in all directions, amid magnificent landscaping, looking out to beautiful luxury liners visiting our shoreline in port.

Most importantly the corner stone to an important change can be laid today. We can have at Fort Armstrong on our ocean shore line a magnificent Hawaii Convention Center

linked to four water ports in Waikiki and to the Honolulu airport at Keehi Lagoon. Of course this can extend to the new city of Kapolei waterport with bus service to Mililani. The return trip could extend to Hawaii Kai.

Linking Waikiki to the Fort Armstrong/Honolulu Harbor Hawaii Convention Center site at Fort Armstrong would require only four water ports in Waikiki and we have two already.

Waterport #1: The Ala Wai Yacht Harbor, on the shoreline area that parallels the park road just Diamond Head of the park's open 500 car parking lot. This will require one or two piers, then four ships could dock simultaneously bringing people to and from Honolulu Airport, Ala Moana Center, Hawaii Kai, other ports in Waikiki, Honolulu Harbor, Pearl Harbor (the military to Fort DeRussy), and to the new city of Kapolei, as well as servicing Mililani by bus to Kapolei's water port, all being important to the Hawaii Convention Center opening to Honolulu Harbor.

Waterport #2: The Hilton Hawaiian Village Hotel. Its excellent water port serves this hotel's 2,650 room and its planned addition will raise this to 3,000 rooms for 6,000 guest. This could be over 7,000 including visitors from other hotels, etc. This will be linked directly to the convention center by off shore catamarans.

Waterport #3: Serving all the Hotels of central Waikiki. Ideally located on the Diamond Head side of the Fort DeRussy Military Museum, it may be possible to utilize the present pier about 300 feet in length. This would have to be evaluated. However, a new shorter widened pier directly aligned with Kalia Road may prove more desirable, leading to a lanai promenade with "a moving sidewalk", flanked on each side by colorful tropical foliage leading to Kalia Road and Saratoga Boulevard. Shuttle busses would transport those arriving to their hotels, and those departing would arrive by shuttle bus at this waterport. Obviously this offshore ferry system would be ideal for military personnel from Pearl Harbor and beyond desiring to have a delightful cruise to their Fort DeRussy resort, and this DeRussy park of 70 acres should be magnificently landscaped as a featured tropical garden entrance to Waikiki.

Waterport #4: "Port Diamond Head". The Natatorium on the shore line of Kapiolani Park is now in total disuse, as it is sinking into the ocean. Yet this facility in the hands of a talented architect can be effectively transformed together with the skills of an excellent landscape architect to a lovely park-like water port. In total we will have a most colorful and impressive water port with the very face of Diamond Head greeting those visitors or kamaainas arriving or departing. You will have the flavor of Hawaiian leis and island music as you step upon a shuttle bus to be taken to your hotel in the Diamond Head section of Waikiki's hotels in ten minutes, missing peak auto traffic of a one hour bus trip from the airport.

To be both responsive and a visionary, put the convention center where it can be served by a commuter water transportation system. It is inevitable that Hawaii will have to turn to the use of water transportation to solve its traffic explosion in the near future, and this is as it should be in an island community. Officials of the City and County of Honolulu already know this and are exploring the possibilities. The State must now become a part of the solution. A water transportation system can generate revenue, serve the convention center, reduce local traffic

congestion and be a marvelous addition to our State's tourism infrastructure and visitor experience.

Governor Cayetano, I was a partner in the Hawaii architectural firm of Dahl and Conrad before I became one of Hawaii's largest and most successful retailers of fine jewelry employing over 150 people. Although I am 84 years old and retired, I still care about making our community better. I feel my experience and knowledge point to action your administration can take now to solve both our financial and transportation ills. I urgently request that you sincerely and immediately explore the ideas I have put forth in this letter. God bless you. Thank you so very much.

Respectfully yours,

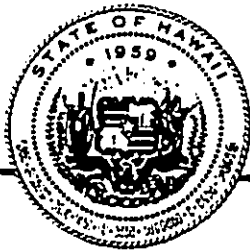


Connie Conrad
(A 60-year resident of Hawaii in Waikiki)

A copy is being forwarded to all member of the Senate and House of Representatives, the Mayor of Honolulu Jeremy Harris and his executive staff, as well as to all the members of the Honolulu City Council.

A copy was also forwarded to the following:

Alan Hayashi, Executive Director, Hawaii Convention Center Authority
Earl Matsukawa of Wilson Okamoto & Assoc. Inc.
Gary Gill, Director, Office of Environmental Quality Control



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Connie Conrad
1600 Ala Moana Boulevard
Penthouse 3900, Yacht Harbor Towers
Honolulu, Hawaii 96814

Dear Mr. Conrad:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 to Governor Benjamin Cayetano, with a cover letter to Mr. Earl Matsukawa of Wilson Okamoto & Associates, Inc., commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Regarding your comments on reducing the State's budget crisis and the cost of the convention center project, we note that the Draft EIS states that the convention center is being funded entirely by transient accommodation tax, more commonly referred to as the "hotel room tax" paid by visitors. The \$350 million established by H.B. No. S7-93, which provided a mechanism for selecting a site and financing the development of the convention center facility, approved raising the five percent hotel room tax to six percent to generate additional funds in order to retire the bonds used to finance the convention center.

Your comments regarding the consideration of an alternative site for the convention center revisits issues which were discussed in several studies which were cited in the Draft EIS. The Fort Armstrong/Kakaako waterfront area offers some advantages, but its distance from Waikiki hotels was cited as a major disadvantage. Given the distance of the Fort Armstrong/Kakaako waterfront area to Waikiki, location of a convention center in that area would have required development of hotels in the vicinity. In turn, this would have raised complex issues with respect to land uses in the Kakaako area.

You indicate that the 9.65-acre convention center site allows for no expansion and growth, inadequately accommodates parking, and would promote traffic congestion. The Draft EIS, however, discusses future expansion plans for the convention

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center facility, including 50,000 square feet of meeting rooms plus supporting facilities and 100,000 square feet of exhibit space. To accommodate this expansion, structural requirements for supporting the expansion have been incorporated in the current design. Regarding your comment about inadequate parking, we note that the number of on-site parking spaces (800) was established on the basis that the Center's primary market is intended to be off-shore national and international conventions, trade shows, exhibitions, and meetings where most of the delegates would be transported to the site by shuttle buses. In regard to traffic, a convention center at the Fort Armstrong/Kakaako waterfront area would generate greater traffic than the Aloha Motors site due to its distance from Waikiki hotel rooms. In a written response to a suggestion by the Neighbors of the Ala Wai that the convention center be located at the Kakaako waterfront area, Mr. Kazu Hayashida, Director of the State Department of Transportation, indicated that the following traffic conditions would likely occur: 1) more shuttle bus trips would be needed because practically no tourists would walk to conventions; 2) shuttle buses from Waikiki would travel westbound on Ala Moana Boulevard and turn left to the Kakaako waterfront area; and 3) traffic congestion would result unless westbound Ala Moana Boulevard were widened and provided with adequate left-turn storage lanes.

We acknowledge your opinion that the convention center site will be plagued by ever growing vehicular traffic congestion, gridlock, noise, and 35,000 hauling trucks annually, and would not convey a Hawaiian sense of place; however, this is not supported by the Draft EIS. The EIS traffic study demonstrates that the convention center will mitigate its traffic impacts to conditions comparable to that of a no-project scenario. Without the convention center, the proposed lane widenings along Kalakaua Avenue, Kapiolani Boulevard, Atkinson Drive, and Kahakai Drive would not be provided. As such, with the increase in background traffic, the levels-of-service in the study area intersections would deteriorate. The lane widenings with the convention center offsets the increase in traffic associated with the convention center. We recognize, however, that the convention center is impacting an area that has significant volumes of existing traffic and that, even if the Center were not built, traffic will continue to increase. The City Department of Transportation Services is examining this traffic situation in a more comprehensive manner through its Waikiki Regional Traffic Impact Plan. While this study is not intended to assess the impacts of the

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convention center, it takes into account convention center traffic, based on the EIS traffic study.

The EIS noise study addresses the potential noise impacts resulting from the operation, as well as construction, of the convention center and identifies specific mitigation measures to reduce or minimize these impacts. According to the noise study, because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

Regarding the 35,000-annual hauling trucks you indicate, it is expected that about 4,500 truck trips (large container trucks) to and from the convention center will be generated annually. While the total number of truck trips (large container trucks and smaller vendor trucks) to and from the convention center may reach about 30,000 per year, this represents a small percentage of the total annual truck traffic that is presently on the streets in the vicinity of the project site. For example, according to State Department of Transportation data, the segment of Ala Moana Boulevard near the Ala Wai Canal bridge presently carries about one million trucks per year.

You cite the traffic congestion which resulted from the Fourth of July celebration near Ala Moana Center last year. It

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should be noted, however, that such occasional event-related traffic congestion is inevitable, wither or not the convention center is built. With respect to the traffic study, there are two considerations regarding such special events. First, local special events (such as the Fourth of July activities) are generally scheduled for weekends and holidays, whereas convention events would generally occur during weekdays. Secondly, we emphasize that the EIS traffic study analyzes the traffic and transportation impacts of a range of scenarios which could reasonably occur at the convention center. It is not feasible or possible to address every conceivable situation or scenario at the EIS level of analysis. The intent of the traffic study is to analyze potential traffic impacts of events at the convention center during peak traffic periods, and to determine whether or not mitigation measures such as lane widenings, traffic coning and on-street parking restrictions can mitigate such impacts to the degree that conditions are comparable to that of the no-project scenario. When it becomes operational, the convention center's transportation coordinator would be responsible for preparing a transportation management plan in coordination with the City Department of Transportation Services (DTS), as deemed necessary, for various events. Many of the suggested mitigation measures will need to be coordinated with DTS, which may require additional or alternative mitigation measures for various events. The transportation management plans could include contingencies to address unique conditions such as parades and events at nearby venues like Ala Moana Park or Ala Moana Center, and respond to future changes in traffic management.

Also, your assumption that all 16,000 conventioners will be travelling to and from the convention center during the peak traffic hours is unlikely. By contrast, the EIS traffic study analyzes potential traffic impacts based on the number of attendees assumed to arrive or depart the convention center during the AM and PM peak hour, respectively, on a peak convention day. For example, for the 14,000-person convention event, the EIS traffic study assumes that 80 percent of the registered conventioners (11,200 persons) would attend events at the convention center. Of the daily attendees, 80 percent (8,960 persons) would arrive during the AM peak hour.

We would also like to clarify your comment that the Fourth of July traffic did not have to deal with trucking activity to/from the convention center, such as the 50 to 75 large

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container trucks and the 100 smaller trucks needed. The EIS traffic study indicates that about 50 container truckloads of freight may be needed to set up a major trade show/convention that uses the entire exhibition hall floor. Such truck activity will occur during one or two set-up days before a convention or trade show event, and one or two move-out days following the event. For set-up, most trucks will likely arrive and depart in the morning; for move-out, trucks may arrive and leave throughout the day and possibly during the early evening hours. Trucks are not anticipated to arrive or depart from the convention center during the morning and afternoon peak traffic periods. Also, a variety of smaller delivery and service vehicles will be travelling to and from the convention center site throughout the day, both during move-in/move-out days and during convention events. As indicated in the EIS traffic study, the volumes of smaller delivery and service vehicles will be on the order of 5 to 10 vehicles per hour, which should not affect traffic conditions.

Regarding your comment on parking needs, for most convention events, the 800 on-site parking stalls would likely be allocated for Oahu visitor attendees, local resident attendees, exhibitors, and full-time employees of the convention center. The allocation of stalls among the attendees, exhibitors and employees would be dependent on the nature of the event. For your information, the EIS traffic study assessed the convention center parking needs based on a 10,000-person national convention using the travel forecast assumptions developed in the study. Assuming that the peak parking demand would occur during the mid-morning period, the parking requirements for convention center employees, Oahu visitor attendees, and local resident attendees are estimated at 390 stalls. The remaining 410 unused stalls would be available to accommodate functions that may have a greater demand than assumed, such as those involving a higher proportion of Oahu resident attendees who may drive to the site. In general, the assessment demonstrates that the 800 on-site parking stalls appear sufficient to accommodate most national and international events at the convention center, assuming that market rates are charged for parking.

To the extent that additional parking may be required for certain events, the EIS traffic study identifies a number of parking alternatives which could become part of an overall transportation management plan by the convention center's transportation coordinator. It is acknowledged that there may

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be events that would have a higher proportion of local residents driving to the convention center, or would require additional temporary and part-time employees, or trade show exhibitors who may require special parking needs. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include use of existing outlying parking facilities that may be available during the event; arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking; and, issuance of public bus passes to convention center employees.

Your review of the number of parking spaces for the Ala Moana Center, Ala Moana Hotel, Ala Moana Park, and the various condominiums, hotels, and office buildings in the area is acknowledged.

Regarding your comment that parking needs will become increasingly worse as more buildings and shopping centers are developed in the area, it is noted that the developer for each project is responsible for providing the required parking for his/her development.

We reiterate our previous responses to your comments about growing traffic congestion and its resulting potential impacts on the convention center, as well as Waikiki hotels and tourism. As indicated earlier, the City's Waikiki Regional Traffic Impact Plan is analyzing traffic impacts of existing and future conditions in the region, including the convention center project, and recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). As discussed in meetings with the State Convention Center Authority (CCA) and the City, it was agreed that the City would incorporate the traffic data from the convention center traffic study into its regional study. Also, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

Regarding your suggestion that the State consider exercising the buyback option or selling the Aloha Motors site on the open market so as to afford the opportunity to move ahead with greater competency and fiscal responsibility, please be apprised that the State executed a binding agreement to purchase the site for the convention center in December 1993.

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As previously indicated, the Aloha Motors site was determined to be the most favorable of all the sites previously studied for a convention center given its proximity to the high inventory of Waikiki hotels.

Your opinion that the State's purchase of the Aloha Motors site for the convention center project would entail a severe cut in the jobs and public services critical to the welfare of the community is unfounded. The economic and fiscal impact study conducted for the EIS clearly shows the benefits of the convention center in increasing tax revenues from income taxes, as a result of jobs created in the visitor industry, as well as from transient accommodation tax, as a result of increased visitor counts.

We are uncertain as to the source of your presumption that the current State Legislature is concerned as to whether funds will even be available to market the convention center. Funding in the amount of \$2 million has been committed by the State Legislature and the State Department of Business, Economic Development & Tourism for fiscal years 1995 and 1996 for marketing of the convention center.

We disagree with your opinion that it was irresponsible for the State, under the leadership of the past Governor, to commit to building a convention center for \$350 million, when it could be done more effectively and with substantially less traffic impact for about \$200 million. We reiterate our previous responses regarding potential traffic impacts and complex land use issues with respect to your suggestion on alternatively locating the convention center at the Fort Armstrong/Kakaako waterfront area.

As the Hawai'i Convention Center develops its market, future expansion of the facility may become economically feasible and desirable. As previously indicated, future expansion plans for the convention center facility include 50,000 square feet of meeting rooms plus supporting facilities and 100,000 square feet of exhibit space. The future meeting room complex will occupy the area presently proposed for the Rooftop Garden. The structural design of the proposed project assumes that the expansion will be similar in layout to the meeting room complex beneath it. The exhibit hall expansion will lie over the meeting room expansion.

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In addition to better accommodating the infrequent larger conventions and providing more space to better serve the mid-size conventions, it is estimated that if implemented, the future expansion would result in a 20 percent increase in the size of the typical large convention, or combination of simultaneous small conventions, using the Center. As the time frame for future expansion of the convention center remains undetermined, a supplemental EIS would need to be prepared when the decision is made to expand the Center.

While the Hawai'i Convention Center faces stiff competition from other convention centers, the reputation of Hawaii as a major visitor attraction and its central location enabling access to east-bound and west-bound markets, provide significant advantages.

Again, we reiterate our previous traffic impact-related responses to your comments concerning potential traffic congestion in the area of the convention center. Also, regarding your comment that the 20,000 people arriving and departing the convention center does not total 40,000 people, we note that the 20,000 people arriving at the facility would be the same 20,000 people departing the facility. You also question traffic conditions six years hence, and indicate the possibility of six new hotel towers. Based on comments received on the Draft EIS, a projection of traffic conditions to the year 2005 (when the Center reaches full stabilized operating capacity) will be included in the Final EIS document. The analysis considers the growth in traffic associated with development of known projects in the area (those of which specific development have been determined), plus uses a growth factor of 0.7 percent per year (growth that is not directly attributable to or associated with the convention center) derived in consultation with the City Department of Transportation Services and pursuant to the City's Waikiki Regional Traffic Impact Plan. Although we are uncertain as to where the six new hotel towers you indicated would be located, the 2005 traffic study considers the proposed or planned projects within the study area which may be developed within that time frame, in addition to the 0.7 percent per year traffic growth factor.

We are uncertain as to the basis for your assumption that a 10,000-person event at the convention center could generate 1,000 daily bus trips in the Waikiki area from early morning to late in the evening. Based on the travel mode split

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assumptions used in the EIS traffic study for a 10,000-person convention, 45 percent of visitor attendees are assumed to ride shuttle buses to the convention center during the AM peak hour (2,730 persons at 45 passengers per bus). This will result in approximately 122 bus trips during the AM peak hour. During the AM peak hour, it is assumed that each shuttle bus would make approximately two trips between the convention center and Waikiki hotels. During the PM peak hour, a total of approximately 850 visitor attendees (or 44.7 percent of conventioners) leaving the convention center for Waikiki hotels are assumed to ride shuttle buses. The shuttle bus operation during the PM peak period is oriented more toward service than efficiency as visitor attendees are expected to leave the convention center throughout the afternoon. Based on a passenger load of 35 passengers per bus, a total of 58 shuttle bus trips are anticipated to leave the convention center during the PM peak hour. During the remainder of the day, shuttle buses would provide continuous service between the convention center and Waikiki hotels. Also, unless there is an evening function hosted by a national convention at the Center, there would not be any shuttle buses operating from the convention center after the PM peak hour (between 4:00 and 5:00 PM).

According to the CCA, it would be rare for the convention center to host conventions much larger than 14,000 delegates, considering the size of the exhibition hall and the number of hotel rooms in Waikiki. For example, the 200,000-square foot exhibit hall could accommodate a maximum of about 20,000 persons, provided the entire exhibit hall is used and there are no exhibits. However, it is extremely rare that conventions would not have exhibits. Furthermore, for the very large conventions (i.e., 30,000 persons), provisions are never made to accommodate the total number of registered delegates at the convention center on any one day due to facility constraints. Rather, various concurrent programs are provided, such as conferences, exhibits, and tours of the town, such that attendees would rotate among the activities over the duration of the convention.

As previously indicated, parking within the convention center is designed to accommodate overseas convention events where most of the delegates would be transported to the site by buses. The Blaisdell Center will remain the primary venue for local events. On-going improvements to the Blaisdell Center were funded in the amount of \$13 million by the State

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specifically to better accommodate local trade-shows and other large local events. Moreover, it is not the intent of the convention center to take business away from hotels with ballroom facilities accommodating smaller conventions, and local events such as wedding receptions. Thus, local events at the convention center are anticipated to be infrequent. To the extent that the convention center parking garage cannot accommodate local parking, event organizers will be required to provide off-site parking. This could include event organizers arranging to use existing outlying parking facilities that may be available during the event. The attendees would be required to park at the off-site facility and be transported by shuttle buses to and from the convention center. Given the limited number of on-site parking spaces, the event organizer would be required to come up with a parking management plan to ensure that additional parking is provided, as needed. Therefore, this would not require the use of more City buses or taxis as you indicate.

We wish to clarify that the \$400,000 traffic study is the City's Waikiki Regional Traffic Impact Plan previously mentioned. Regarding your comment that there may be thousands of family members accompanying conventioners to each event, thereby adding to traffic, it is noted that Oahu visitors already staying at Waikiki hotels generate traffic which currently impacts such non-convention center destinations. Given the number of hotel rooms presently available in Waikiki, conventioners would essentially "replace" the non-convention visitors who would otherwise be staying in Waikiki. Likewise, conventioners visiting non-convention destinations would essentially replace the Oahu visitors (non-conventioners) who would otherwise have visited these areas. Therefore, the vehicular and pedestrian trips generated by conventioners would not significantly differ from non-convention visitor trips to these destinations.

You also indicate that traffic congestion will permanently "choke" the marketability of the convention center in this location. We reiterate that the convention center operator will have a transportation coordinator on its staff to assist event organizers develop and implement an appropriate transportation management plan for their events. It is in the economic interest of the convention center operator and convention planners to assure that inconvenience and delays to conventioners is minimized in any transportation plan; otherwise, they risk a tarnished reputation for the Center.

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Given Hawaii's favorable climate conditions, along with the proximity of hotels within various walking distances from the convention center, it is assumed that a sizeable portion of conventioners staying within convenient walking distance of the Center would likely walk. The walk mode split would have some relationship to the size of the event, but is based on the acceptable walking time and the number of hotel rooms located within that walking distance. According to discussions with managers of various Mainland convention centers and Waikiki hotels, in general, conventioners would most likely walk to destinations located within a 10-minute range. Hotels within the 10-minute walking distance from the convention center are the Ala Moana Hotel, Hawaii Prince, Outrigger Hobron, and Inn on the Park. In the EIS traffic study, the cumulative percentage of walk trips for the 10,000-person convention (35 percent) was reduced for the 14,000-person convention (10 percent) to provide a more conservative basis for assessing a "worst-case" traffic situation. Also, the intersection analyses in the EIS traffic study considers the high volume of pedestrians crossing at the affected intersections.

Regarding your comment about two more significant traffic realities including the estimated increase in number of vehicles, reiterate that the potential convention center traffic-related impacts and proposed mitigation measures are included in the EIS traffic study and the forthcoming 2005 traffic study which will be included in the Final EIS document. Also, the City's Waikiki Regional Traffic Impact Plan, which considers the convention center, is being prepared to analyze regional traffic conditions. These traffic studies are discussed in our previous responses. In response to your comment about the possibility that traffic problems will plague this project and negatively impact convention business, we previously responded that it is in the economic interest of the convention center operator and convention planners to assure that inconvenience and delays to conventioners is minimized in any transportation plan; otherwise, they risk a tarnished reputation for the Center.

You question how the ewabound traffic on Kapiolani Boulevard turning left onto makaibound Atkinson Drive would be handled, since this left-turn is presently prohibited at certain peak traffic hours. This existing left-turn restriction during the PM peak traffic period contra-flow coning operation will remain unchanged with the convention center project. Due to

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this left-turn restriction, motorists travelling to the convention center from Waikiki during the PM peak traffic period will be directed to approach the Center via westbound Ala Moana Boulevard, and right-turn onto Atkinson Drive.

We wish to clarify that conventions are anticipated to occur at the Center a total of about 172 days of the year. The remaining 193 days would be the "dark days", which are the respective one or two set-up/take-down days before and after a convention event.

As previously indicated, the future 50,000 square-foot meeting room expansion will be located in the area presently proposed as the Rooftop Garden on the fourth level. This meeting room expansion, along with the 100,000 square-foot exhibit space expansion, would result in a 20 percent increase in the size of the typical large convention, or combination of simultaneous small conventions, using the Center. For example, the expansion would allow for an increase in the size of a 14,000-person convention to 16,700 persons. To accommodate this expansion, structural requirements for supporting the expansion have been incorporated in the current design. The cost for constructing the expansion, however, is not included in the \$200 million allocated to design and construct the convention center facility. As indicated previously, the time frame for future expansion of the convention center remains undetermined. Furthermore, a supplemental EIS would need to be prepared when the decision is made to expand the Center.

Although your suggestions for siting the current convention center design at the Fort Armstrong site are well-taken, we reiterate our earlier response that although this site offers some advantages, its distance from Waikiki hotels was cited as a major disadvantage in earlier studies for a convention center site.

You express disagreement that the people of the State are getting the finest convention center in the best location for the best price. We note, however, that the Request for Proposals (RFP) for development of a convention center set forth specific design criteria for achieving a world-class facility, including future facility expansion.

You also indicate that a convention center at the Fort Armstrong site would be linked to Waikiki, the financial and

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business center, and Iolani Palace, as well as in proximity to the Aloha Tower Marketplace. You also suggest that the Hawaiian Electric power plant near the Aloha Tower Marketplace could eventually be redeveloped with hotels. However, we again reiterate that the proximity of the convention center to an inventory of existing hotels was a primary consideration for selecting the Aloha Motors site.

While your concept of waterborne transportation from Waikiki to Keehi Lagoon near the Honolulu International Airport (with a possible extension to a Kapolei City waterport with bus service to Mililani, and to Hawaii Kai) sounds feasible and appears attractive on the surface, working out the details of such a system at the level of detail required for an EIS would probably reveal more considerations than would be apparent on the surface. For example, there is the need to build ferry terminals, including any required dredging for channels through reefs; conflicts with swimmers, surfers and canoers; and, shuttle bus staging and parking areas at ferry terminals and associated traffic considerations.

In addition, because of the varying size of convention events, the passenger capacity of ferry or catamaran vessels and the size of the required fleet would be important considerations. One of the factors working in favor of the shuttle bus service is that there are sufficient tour buses on Oahu to meet the type of demand that would be created by the convention center. The size of the tour bus fleet is related to the number of hotel rooms on Oahu. Thus, when most of the rooms are occupied by conventioners, the buses would transport its occupants to the convention center. When the rooms are occupied mostly by vacationers, they would transport its occupants to visitor attractions.

It is difficult to imagine a comparable ferry fleet that could economically transport participants for widely varying sizes of conventions unless they become part of a large visitor industry transportation system like the tour bus fleet. A ferry vessel holding 300 persons would require 20 trips to transport 6,000 conventioners within the peak hour, which is envisioned as the number that would be transported by bus during the peak traffic hour for a 14,000-person convention event. An additional 1,400 pedestrian conventioners assumed to walk to the proposed convention center would have to be added to the ferry count, bringing the total number of ferry trips to 25 in the peak hour. The remainder is assumed to go

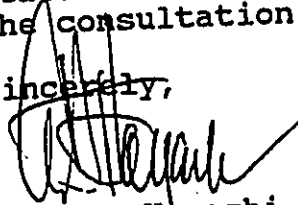
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July 17, 1995
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by other mode of land transit, go before or after the peak hour, or not attend at all. Assuming that each ferry could make a round trip in as little as 30 minutes, which is unlikely, this would mean that at least 13 vessels would be required for an event that is projected to occur once in three years. Maintaining such a fleet of ferries would imply that they would be involved in other economically viable transportation activities when they are not transporting conventioners. We have difficulty imagining a private interest investing in such a venture.

With regard to a waterborne public transit system, it should be noted that the State Department of Transportation attempted to initiate such a system in the late 1980's, but it was not viable. Using such a system to transport conventioners would be analogous to relying on the City bus system to get conventioners to the convention center. Ferries would need to be diverted from their normal commuter routes to supplement the Waikiki to Fort Armstrong run during the commuter rush hour. Such interruption of service would not be conducive to establishing a successful waterborne commuter transit system.

We appreciate the care you express with respect to bettering our community. Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

RECEIVED
MAR 28 1995

WILSON OKAMOTO & ASSOC., INC.

469 Ewa Pl, Apt 2207
Honolulu, HI 96815
March 24, 1995

Wilson Okamoto & Associates, Inc
1907 S. Beretania, 4th floor
Honolulu, Hawaii 96826

To those concerned:

Enclosed are my responses to selected portions of the DEIS. Socio-Economic Environmental Impacts (Section 4) was completely covered, including the KPMG Pest Management LIP assessment.

In Section 5, Education and Child Care, Recreational Facilities, and Health Care Facilities received brief responses.

Long-term Considerations/Unresolved Issues were considered, followed by my summary of my findings.

Thank you for all your courtesies.

Sincerely,
Francis Delany, Ph.D.

SOCIO-ECONOMIC ENVIRONMENTAL/IMPACTS
Frances Delany, Ph.D.

DEIS
March 4, 1995

SOCIAL IMPACT

Section 4 of the DEIS is well-organized and presents a true-to-life picture of social impacts. Because the convention center is visitor-oriented, changes will occur not agreeable to the largely residential neighborhoods. Five fundamental issues were explored: conflicting attitudes towards tourism, tourism and urbanization, tourism wages and working conditions, tourism and cultural effects. An emerging approach to tourism emphasizes not "growth is good" but "sustainable development", which "includes an economy which is indigenous and self-reliant, and is based on maximum citizen participation."

Traffic remains the biggest community issue. Doubts persist that it can be managed effectively.

Although the issues of an integrated approach toward project impacts is stressed, its effects appear to be related to land use and economic results rather than to social aspects and infrastructure. When greed wins, the balance between economic benefits and social costs is lost.

Neighborhoods will suffer a loss of ambience if urban qualities are intensified and if land use policies are modified to allow resort facilities. There is no mention of the high-rise condominiums in the Hobron-Ena area which comprise the highest residential area in the state. This represents a serious omission. Another missing datum concerns the Waikiki Neighborhood Board. The Board twice supported a motion which stated: "No convention center in or near Waikiki". This represents more than nimby. The Neighborhood Board is keenly aware of the problems within Waikiki, more so since the discussions about the Waikiki Master Plan. This finding should have been explored.

The KPMG Peat Marwick LLP assessment concerns the economic and fiscal impacts of the convention center. ("All monetary projections are stated in constant 1994 dollars.) Some questions arise. The report states Honolulu's existing hotel inventory is about 28,600 rooms. This underestimates current City Council numbers. Further as a result of the convention center KPMG asserts that 7,700 new daily room nights will be demanded. The statement that "property values can be expected to

2 -SOCIAL IMPACT

increase within the immediate area alarms the residents who live in the immediate area. Operating expenses (supplied by the state) for the CCA are \$500,000 per year. This figure ought to be broken down. The assumption that daily expenditures per person at \$652 per day as reported by HVB should mention the exact date and basis for this assumption. The two sentences now quoted appeared unreal: "...This indirect and induced spending adds to the economy another \$0.77 per direct dollar spent by convention center visitors, or a total of \$2.3 billion by 2003, and about \$2.8 billion at HCC's stabilization. All together, total direct, indirect and induced spending attributable to HCC is projected to contribute \$6.4 billion to the State's economy."

Employment

In construction employment, "HCC will generate short-term employment during construction of the facility, and long-term employment in the operation and support of the convention center". Combining all construction employment, the study projects 690 full time equivalent positions for a 3 year construction period.

Direct operational employment will involve approximately 120 full time equivalent positions in administration, sales and marketing, house-keeping, maintenance, food service, conversion crews, security, and parking. However, some additional data ought to be provided in order to compare these positions with budget requests to the legislature by HVB, DBEDT in combination with CCA requests. Projections for year 2008 (year of HCC "stabilization")⁸⁴⁻⁹ call for 2900 new in-migrant positions. Many of the interviewees stated that "visitor industry jobs pay low wages and many work under less than desirable conditions".

Francis Delaney

SECTION 5 SERVICES/IMPACTS

Frances Delany, Ph.D.

DEIS

March 4, 1995

Education and Child Care

The Child Care section refers to the 1989 study by Peat Marwick Company which reported that the projected additional demand for child-care was inadequate to justify an on-site day care facility. This paragraph appears outdated and incomplete. With the increased "in-migrant" population, the topic requires further study. Many workers will have children and yet because of the limited affordable housing in or near Waikiki, or because some workers may already have adequate housing at a distance from the site, it well may be that their children can be more appropriately placed in nearby schools or child care centers conveniently located near the parent's workplace. Such placements would reduce a worker-parent's stress about handling the child's daily location.

Recreational Facilities

This section includes parks and beaches, the Ala Wai Canal and the Ala Wai Promenade. No mitigation is planned for the several beach areas although there exists a potential for crowding in the beach areas. Why not ask hotels housing conventioners to advise their guests about beach facilities? In this way problems and prospects can be discussed in a pleasing hospitable atmosphere.

The Ala Wai Canal may be used as a method of transportation for conventioners. Certainly the convention center planners or the traffic management planners must coordinate existing uses with canal users, the appropriate state and city agencies. The Ala Wai Promenade, as planned, anticipates pedestrian access to the convention center. This walkway necessitates detailed attention so that any modification can be discussed with both city and state in order to accommodate overall development plans.

2 -Section 5

Health Care Facilities

Personal communication with Kenneth Yoshida (State Department of Health) reads "...the project can be adequately served by existing facilities". However no plan is offered whereby ambulances can be offered immediate access. Immediate access is the sine qua non to treat effectively medical emergencies. An additional safety valve should be to arrange to employ a nurse on the site in a room containing first-aid or para-medical supplies.

James Delany

LONG-TERM CONSIDERATIONS/UNRESOLVED ISSUES

DEIS

Frances Delany, Ph.D.

March 4, 1995

Probable Adverse Environmental Effects Which Cannot Be Avoided

Short term effects during construction include noise, vibration, and traffic frustrations. Noise from construction will be lessened by using muffled equipment. Vibration monitoring ought to be measured frequently in and by adjacent structures. A designated person should be named to perform this service and to maintain accurate records.

The construction management should employ a traffic manager to give equal attention to the project needs and neighborhood needs. As was pointed out in the public hearing of February 22, 1995, Summer Palace requires modification by the design-builder in order to achieve an orderly ingress and egress.

The long-term effects include air quality, noise, traffic, view planes and social effects. How noise emanating from the Roof Garden will be mitigated is not spelled out. In addition, potential redevelopment will further burden immediate neighborhoods and businesses. Mitigations to all these effects need to be made public by the design-builder with proposed mitigations. Otherwise there will be a public outcry and protest.

Social impacts include changes in assessed property values, displacement and changes in demographics, and a discernible change in neighborhoods.

Summary of Unresolved Issues

Water quality and archaeological findings remain "unsolved". The rate of dewatering effluent may or may not have sufficient land in which it can be retained.

The State Historical Preservation Division determines whether the survey is sufficient in its findings of historic sites and resources.

Frances Delany, Ph.D.

March 4, 1995

Summary of Report

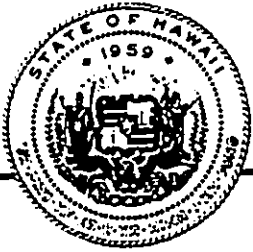
Many problems remain unsolved in connection with the convention center. Many fiscal and economic benefits appear unduly optimistic.

How can the city be expected to remain solvent when only negligible income accrues before 2008 (when net revenue ^{still} remains negative)? The city is responsible for many services, some of which will require further manpower; this peculiarity must be challenged and mitigated. Although few convention centers make expenses, the projected outlook for HCC states that tax benefits will reach \$216 million by 2008.

Traffic is not resolved. Neighborhoods already have recognized their diminished quality of life inherent in the location. Yes, there have been public meetings, but as recently as February 22, 1995 it was clearly articulated that the Summer Palace ingress and egress had not been thoroughly mitigated. In other words, people are permitted to speak openly, but they do not receive adequate explanations. Also there appeared to be a paucity of knowledge about the adjacent lot consolidations and current zoning. Surely more density and construction will exponentially affect convention center access and egress.

Many mitigations have an "if" quality. This is not reassuring for the project's integrity or success.

Frances Delany



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Frances Delany, Ph.D.
469 Ena Road, #2207
Honolulu, Hawaii 96815

Dear Dr. Delany:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawai'i
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Social Impact

We are pleased that you found the social impact assessment (SIA) to be well-organized and true-to-life. We acknowledge your support of the emerging suggestion from environmental interests that Hawaii's economy should be one that is "indigenous and self-reliant, and is based on maximum citizen participation." The SIA identified this suggestion as a counter-point to the conventional "growth-is-good" mentality which some may suggest drives the convention center project. The EIS is not intended to serve as a forum for debating the merits of either view but to disclose that these views are held by the community. With respect to citizen participation, the EIS process as well as the efforts of the CCA to augment legal requirements for public participation have clearly demonstrated our intent of facilitating citizen input.

We concur with your comment that doubts persist about the efficacy of our proposed traffic impact mitigation measures. Nevertheless, we are confident that the EIS traffic studies are appropriate and that their findings are correct. The problem resides in the public perception that the traffic problems are insolvable and our inability to educate the doubting public. Because traffic acceptability is based on individual emotional standards it is a difficult subject to discuss. However, the CCA will continue to dialogue with the public to attempt edification.

We do not clearly understand your comment about the "integrated approach." By nature, the various technical studies would rely on different approaches and methodologies.

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Page 2

To a large extent, the social impact assessment addresses the community perception of the various issues addressed by the technical studies but the studies themselves are independent analyses. We note that the Draft EIS specifically addresses infrastructure impacts. Other comments received on the Draft EIS have indicated that some of the projections in the economic and fiscal impacts assessment, including new hotel room construction and in-migration, could be more clearly assessed in the social impact assessment. Toward addressing such comments, both the economic and fiscal assessment of the social impact assessment have been revised to better integrate their findings.

Your comment regarding the impacts of land use policies allowing resort uses is acknowledged. The social impact assessment in the Final EIS addresses the consequences of such uses particularly in the immediate vicinity of the project site and discusses potential mitigation, including revision of land use policies to disallow resort development.

Your observation that "high-rise condominiums" were not mentioned in page 49 of the Social Impact Assessment is correct. Although specific residential structures were named previously on page 12, the reference to those structures as high rise condominiums was inadvertently omitted. This error will be corrected in the Final EIS.

Also inadvertently omitted was information about the Waikiki Neighborhood Board's position on the convention center. The research of the Board's minutes between January 1993 and January 1995, however, did not indicate that they supported a motion for "no convention center in or near Waikiki." On August 3, 1992, the Board voted to oppose a convention center at the Hobron Lane area, and voted to support a convention center at the Ala Wai Golf Course site. The latter site is near Waikiki and would be supported by visitor facilities across the Canal. This information will be included in the Final EIS.

Based on comments received on the Draft EIS, the economic and fiscal impact assessment was revised for inclusion in the Final EIS. According to the revised assessment, Oahu's reported 1994 hotel inventory is about 28,414 rooms, excluding condominiums, condominium-hotels, apartment, bed and breakfasts, hostels and other non-hotel accommodations) The count in the Draft EIS was based on the 1993 Hawaii Visitor

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Page 3

Bureau Plant Inventory, the most recently available data at the time the research was conducted.

The statement that property values in the vicinity of the convention center are expected to increase could also be favorably viewed by landowners. This impact is discussed as a cumulative effect in the neighboring area of the convention center in the social impact assessment of the Final EIS.

The \$500,000 per year estimate for State costs to operate the convention center authority was provided by the CCA. It is an annual estimate and is not broken down. However, CCA annual reports are available since 1989 at the Legislative Reference Bureau or from the CCA. The State has approved funding for the CCA through 1997, at which point the legislature must again approve funding for the continued operation of this office. For the purposes of the economic and fiscal impact assessment, it was assumed that the State will continue funding the CCA or some other State entity to continue its marketing and business development functions for the convention center.

The key source of data for the daily expenditure rate is from the HVB. Based on comments received on the Draft EIS, additional research was conducted to determine if expenditure rates for other convention centers corroborated HVB'S figures. Two scenarios were formulated, corresponding to a high and low spending rate, respectively. The following discusses the formulation of the spending rates in the two scenarios.

Convention visitors are associated with significantly more spending than the average visitor to Hawaii, since costs of the convention, entertainment and promotional items are added to their daily personal expenditures. In estimating a range of expenditures per person, reviewed were Hawaii Visitors Bureau (HVB) surveys on the meeting and convention markets as reported in its Visitor Expenditure Reports for 1991, 1992, and 1993, which are the most recently available. The HVB data shows that in 1993, westbound meeting and convention visitors spent \$617 per person per day while eastbound meeting and convention travelers spent \$720.

To those familiar with typical spending patterns for other visitors to Hawaii, these figures may seem high. That is because, in addition to the money spent by each delegate or

exhibitor, the sponsoring groups typically spend an even greater amount in the State (noted as "supplemental" spending by the HVB). In the economic assessment, these supplemental business expenditures, which occur in Hawaii and may be spent by the event organizer or other sponsors, are averaged over all delegates and exhibitors and their entire length of stay in the State. According to the HVB, these supplemental expenditures include the following:

- Hospitality activities (suite, food, beverage, service, tips, etc.)
- Business entertainment/business meals;
- Cost of exhibit space;
- Local drayage/storage;
- Local audio/visual materials and equipment;
- Ancillary services (telefaxing, duplicating, printing, secretarial, etc.)
- Union labor for exhibit set-up;
- Promotional or give-away items purchased locally;

For 1993, the HVB reported the following expenditure data on meeting and convention visitors to the State:

	<u>Personal</u>	<u>Suppl.</u>	<u>Total</u>	<u>% Mix</u>
<u>Westbound Travelers:</u>				
Convention Delegates	\$ 152	\$ 406	\$ 558	76%
Corporate Mtg. Delegates	<u>202</u>	<u>602</u>	<u>804</u>	<u>24%</u>
Weighted Average	\$ 164	\$ 453	\$ 617	100%
<u>Eastbound Travelers:</u>				
Convention Delegates	\$ 236	\$ 406	\$ 642	72%
Corporate Mtg. Delegates	<u>320</u>	<u>602</u>	<u>922</u>	<u>28%</u>
Weighted Average	\$ 260	\$ 461	\$ 720	100%

Source: Hawaii Visitors Bureau, Visitor Expenditure Report, 1993

For the future, westbound visitors were estimated to represent 85% of delegates for exhibitors, and eastbound visitors 15%. This results in the weighted average expenditure per day for all delegates or exhibitors of \$632 in 1993 dollars or an estimated \$652 in 1994 dollars.

In the future, average spending per capita could be lower than historically, since the State is anticipated to attract larger events. Also, after reviewing data on supplementary

expenditures per capita at New Orleans and Orlando convention centers, the \$650 benchmark was adjusted downward as follows:

	Personal	Supplemental	Total
Benchmark*	\$182	\$468	\$650
Scenario I: Adjustment from benchmark Projected Spending	<u>100%</u> \$182	<u>(40%)</u> \$238	\$465
Scenario II: Adjustment from benchmark Projected spending	<u>100%</u> \$182	<u>(20%)</u> \$373	\$555
* Based on 1993 data on Hawaii meeting and convention visitor spending, inflated to 1994 dollars at 2.8% and assuming a mix of 15% eastbound visitors and 85% westbound visitors.			

Thus, the economic impact assessment assumes that supplementary expenditures are about 20% to 40% less than observed historically in Hawaii, while personal expenditures for delegates/exhibitors and attendees remain the same at \$182 per day. This results in an average total per delegate/exhibitor expenditure of \$465 to \$555 per day, in 1994 dollars. This range is used as a basis for the assessing of the low (Scenario I) and high range (Scenario II) economic impact, respectively.

As a result of the adjustment in expenditure rates, the total effect of direct, indirect and induced spending have been revised in the economic and fiscal impact assessment for the Final EIS. The following describes how this total is derived:

As the convention center reaches stabilized levels of operations, bookings are expected to amount to about 60 events per year, averaging from 6,200 to 7,500 delegates and exhibitors at each event, as projected by the CCA.

Direct spending by visitors attracted by events at the convention center are projected to impact the State as follows:

- Spending by or on behalf of convention delegates and exhibitors was discussed previously, and is projected to

average between \$465 and \$555 per delegate per day in 1994 dollars, for Scenario I and II.

- Based on an average length of stay of about 8.14 days, direct annual visitor spending due to Center attendance is projected to amount to nearly \$1.3 to \$1.8 billion by the 2008, for Scenario I and II, respectively.
- Indirect and induced spending adds another \$0.77 to the economy per direct dollar spent by convention center visitors. (Indirect spending represents expenditures in the State by businesses that benefit directly from direct expenditures. For instance, the hotel operator that gains occupancy may purchase more proteas than previously from a farmer on Maui. Induced spending represents the re-spending of earned income throughout the State's economy by employees or proprietors of businesses that benefit from direct or indirect expenditures. For instance, a hotel worker may use her income to purchase groceries near her home in Mililani.)
- The total effect of direct, indirect, and induced spending attributable to the Center is projected to range as follows in the year 2008:

Projected Annual Visitor Expenditures Attributable to the Convention Center: Statewide, 2008 (1994 dollars, in millions)		
	Scenario I	Scenario II
Direct expenditures *	\$1,648	\$2,331
Indirect and induced	\$1,269	\$1,795
Total (rounded)	\$2,918	\$4,125
* Net of lost spending by potential displacement of visitors out-of-State and the existing Oahu meeting capacity.		

Employment

In both the earlier and revised economic and fiscal impact assessment, direct operational employment at the convention center was estimated at 350 full-time equivalent (FTE) jobs,

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as provided by the consulting firm of Group 2+ International of Bellevue, Washington. Group 2+ International is the operations and food service consultant to the CCA, and was engaged by the CCA to provide such consultation. This total is broken into approximately 120 FTE positions in areas such as administration, management, sales and marketing, housekeeping, maintenance, food services, conversion crews, security and parking. In addition, there is likely to be an on-call food service staff of approximately 230 FTE positions, for a combined total staff of about 350 FTE employees. It is likely that the State will contract a private management team to operate the facility, and that food services will also be subcontracted.

While many consider visitor industry jobs to offer low pay and to provide less than desirable conditions, data indicate that persons continue to move to the islands to take such jobs. Perhaps many are attracted by the relatively low levels of training required of such jobs, and for others, in comparison to opportunities in their place of origin, our visitor industry jobs are attractive.

Education and Child Care

It should be clarified that the projected 2,900 new in-migrant jobs would be created throughout the visitor industry, including on the Neighbor Islands as a result of vacationers from Waikiki displaced by convention delegates, or by pre- and post-convention vacationing by delegates. If child care facilities were to be provided for such workers, they would need to be considered on a Statewide and industry-wide basis, as opposed to the role that the convention center could play.

The 1989 study was provided as a comparison between the employment created at the State's presently proposed "stand alone" convention center and the private convention center complex proposed in 1989. The previous proposal included an 800 room hotel as well as an office building, retail center and 800 condominium units, all of which would have created significantly greater employment and residential opportunities on-site and raised the question of whether or not a child care center within the complex would have been necessary. The employment projection on-site for the previous proposal 1,910 jobs by 1997. By comparison, the current proposal projects 350 full-time equivalent jobs. Moreover, the current proposal

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has no associated residential uses for which child care needs were also considered in the 1989 study.

The CCA's operator will be directed to investigate the delegates requirements as to partial child care during attendance at the convention. If the program can be expanded to incorporate employees child care economically the CCA may agree to do so in the future.

Recreational Facilities

Your suggestion for hotels advising convention delegates of beaches they could use may be an appropriate solution if overcrowding becomes a concern. Hotels could do this as a service for their guests.

The present design of the convention center would not preclude waterborne transit for convention delegates. In addition to working out potential conflicts with other users of the canal, the canal itself would need to be dredged to allow freer movement of vessels, and the impact of the facilities on the historic character of the Canal would need to be considered. With respect to improvements on the Ala Wai Promenade to accommodate pedestrian use, the design/builder continues to be involved in discussions with both the State Historic Preservation Division, the City Department of Parks and Recreation, the City's Exceptional Tree Committee and the Outdoor Circle.

Health Care

Emergency health care for persons at the convention center is not discussed as an impact of the convention center; however, as discussed in the Project Description, there is a first aid room and provision for emergency vehicle access near the security command center which has direct elevator access to all levels of the convention center.

Probable Adverse Environmental Effects Which Cannot Be Avoided

To minimize risks of potential damage due to vibration from pile driving, a program to detect potential damage to neighboring buildings will be implemented. This will involve extensive documentation of existing building conditions using still photography and video recordings. All visible damage such as cracks in walls and slabs will be documented as a

Frances Delany, Ph.D.
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basis for identifying any new damage that may be associated with vibrations from pile driving. In addition, electronic surveying equipment capable detecting minute shifts in reference points to be established on the buildings will be utilized to determine if building foundations are being affected. A monitoring program for these electronic surveys will be established to provide early detection of any impacts such that pile-driving activities can be halted and modified, as necessary. The design/builder will be responsible for any damages to neighboring buildings that are attributable to pile driving or other construction activities.

The design/builder will have full-time traffic control for all deliveries to the site.

Noise from rooftop activities will need to comply with Department of Health noise standards. To comply with these standards, the Draft EIS recommends against gatherings in excess of 10,000-persons and use of sound amplifying equipment unless sound attenuating measures are employed.

The social impact assessment identifies and discusses potential impacts and concerns related to redevelopment that may be accelerated or induced by the convention center. Additional discussion of potential mitigation measures will be included in the Final EIS, although implementation of such measures may be beyond the authority of the CCA.

The social impacts you identify have been discussed in the social impact assessment.

Summary of Unresolved Issues

Water quality issues related to construction dewatering are technically unresolved since the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activity Dewatering has yet to be approved. The permit application, which has been filed with the Department of Health (DOH) offers a BMP plan that eliminates the need to discharge dewatering effluent except, possibly, during heavy or prolonged storm events. Hence, the permit is requested only for emergency discharges during such storm events. To avoid discharging the effluent, retention basins, which may include excavations needed for construction, will hold the effluent until it can percolate back into the ground. In the event of a large or prolonged storm, the retention basins will

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serve as detention basins, holding the effluent long enough to allow sediments to settle out before it is discharged. Other required sediment reduction methods include lining excavations with filter fabrics to reduce the amount of sediment entering the effluent and using filters on intake lines.

Pending incorporation of laboratory analyses findings for core samples, the completed archaeological inventory survey will be submitted to the State Historic Preservation Division, probably in July, 1995.

The Final EIS will include discussions of additional unresolved issues that have been identified in the public review phase of the Draft EIS.

Summary of Report

We acknowledge that there are several concerns that remain unresolved, some of which need to be formally addressed by agencies issuing permits or approvals required for the project. Most of these issues have been identified in the Draft EIS and further clarification will be provided in the Final EIS.

The economic and fiscal impact assessment in the Final EIS has been revised based on comments received on the Draft EIS and follow-up discussions with various agencies, as well as information that was not previously available, and additional research. It has also been revised to provide a range of estimates, including one based on a more conservative consideration of assumptions leading to the projection of economic impacts.

One of the revisions in the assessment is the distribution of the Transient Accommodations Tax (TAT), which since July, 1994 allocates 34.9% to Honolulu County. The prior assessment in the Draft EIS neglected to consider this distribution requirement. As a result, the County's revised share of the statewide TAT collection could range from \$7.0 to \$8.9 million in the revised 2008 projection. The County's net new revenue projection is also positive, ranging from \$3.6 to \$5.4 million per year in 2008.

The intent of the traffic studies in the Draft EIS is to identify the impacts of traffic generated by the convention center on significantly affected intersections, recommend

Frances Delany, Ph.D.
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Page 11

potential mitigation measures and assess their effectiveness. The CCA has endeavored to explain the findings of these studies at various public informational forums, however, our observation is that they have been met with skepticism. In response to various comments received on the Draft EIS, supplemental analyses of traffic have been prepared which additionally support the findings of the earlier traffic studies. These include an analysis of additional intersections to demonstrate that the significantly affected intersections have been addressed in the earlier studies, as well as a year 2005 analysis to identify considerations in the growth of background traffic that could affect traffic in the vicinity in the future.

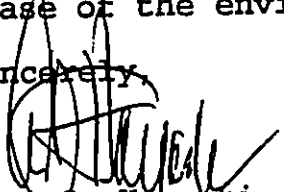
The "paucity of knowledge" about the development of property in the vicinity of the convention center you refer to is an acknowledgement in the Draft EIS that future decisions by both private developers and the City Council in granting entitlements for development, cannot be predicted with any certainty. Hence, the social impact assessment in the Draft EIS identified "areas susceptible to development" and assessed the impacts of potential redevelopment scenarios, without considering when they might be developed, if at all. Traffic associated with potential future development is addressed in the new year 2005 traffic assessment. This assessment considers the growth in traffic associated with overall development in the region. It uses a growth factor derived in consultation with the City Department of Transportation Services which is preparing the Waikiki Regional Traffic Impact Study. For longer term traffic projections, such as to the year 2005, using the growth factor is a more appropriate than speculating if any particular parcel of land would be then be developed with a particular type of land use.

The EIS process requires the discussion of potential mitigation measures as well as the identification of those which will be implemented. Implementation of some of these measures is beyond the authority and responsibility of the CCA and the design/builder. It should be realized that the EIS is intended to disclose information about the impacts of the project, not necessarily to assure that all potential impacts will be mitigated.

Frances Delany, Ph.D.
July 17, 1995
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Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

MAR 23 1995

250 Ohua Avenue, 10E
Honolulu, HI 96815
22 March 1995

Mr. Alan S. Hayashi
Executive Director
Convention Center Authority
1833 Kalakaua Avenue, Suite 800
Honolulu, HI 96815

Dear Mr. Hayashi:

Early this month area residents and their two representatives and two senators met at the Waikiki Community to discuss their problems and concerns. The overriding concern proved to be the traffic congestion engendered by construction and then use of the convention center.

Critiques I have seen of the transportation impact analyses included in the DEIS for the Center paint a disturbing picture: lack of substantiated data; arbitrary assumptions; optimistically misleading projections; oversight of assessing pedestrian movement (notably at Kalkap), and so on.

If this is the case, a new study/plan by better consultants would seem an imperative. Certainly Kapahulu should be included, since it will be used increasingly as a means of access to H1 and downtown once other arteries are more clogged.

Meanwhile, three other elements should be given present attention. The synchronizing of traffic lights on Kuhio and Kapahulu would encourage greater freedom of movement in and out of Waikiki. This would also apply to Ala Moana Boulevard.

Secondly, many buslines use Kuhio. At the Ohua intersection they clog traffic when two #2's come by in tandem and three #8's, one a twin, compete for lanes. Their origination point is scarcely a half-mile. Improving control of their schedule would serve other vehicles as well as passengers.

Finally, police policy, as reported in the evening paper, is that its forces not be deployed to direct traffic in the approaches to construction sites. My experience largely confirms this. Police are present at the eternally ongoing work at McCully as well as repairs on the Ala Wai and Kalakaua. They are there seemingly to bond with workers or fellow officers. I feel that reconsideration of the policy in order to activate these officers toward moving traffic might well improve the image of the department.

Thank you for your consideration.

Sincerely yours,

John Diercks
John Diercks

cc: Carol Fukunaga, Senator



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. John Diercks
250 Ohua Avenue, 10E
Honolulu, Hawaii 96815

Dear Mr. Diercks:

Subject: Hawaii's Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter of March 23, 1995 commenting on the subject Draft EIS.

We acknowledge that the overriding concern about the convention center as expressed at the March meeting at the Waikiki Community Center was traffic congestion during its construction and operation.

We offer the following responses to your specific stated concerns regarding the traffic impact analyses conducted for the convention center:

Lack of substantiated data:

The traffic count data derived from the *Hawaii Convention Center Transportation Impact Assessment* prepared by Wilbur Smith Associates (WSA/TIA) for the morning and afternoon peak traffic periods was further validated for the *Transportation Impact Analysis Report* prepared for the environmental impact statement (EIS TIAR). The traffic data in the WSA/TIA was verified by manual traffic count surveys taken in 1994 by The Traffic Management Consultant (traffic consultant to the EIS TIAR) and the most recent available data from the City and County of Honolulu Department of Transportation Services (DTS) and the State of Hawaii Department of Transportation (DOT). Furthermore, manual counts were conducted by The Traffic Management Consultant at specific intersections to verify critical turning volumes in the study area. Also, the traffic count data for the mid-day (weekday) peak and Friday evening post-commuter peak period analyses were obtained by manual traffic count surveys conducted for the EIS TIAR.

Mr. John Diercks
July 17, 1995
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Arbitrary assumptions:

The travel forecast assumptions and modal shares used in both the WSA/TIAR and EIS TIAR were developed pursuant to discussions with persons with extensive experience in convention center operations across the nation and those associated with major Waikiki hotels which host convention events. Specifically, information was obtained through discussions held with managers and others associated with the Los Angeles, San Diego, Miami, Portland, and Sacramento convention centers, and the Moscone Center in San Francisco. In addition, the information obtained was further supplemented and verified in consultation with the State Convention Center Authority's (CCA) technical evaluation board member on convention center operations and with the CCA's Marketing Director.

Optimistically misleading projections:

All of the projections described in the Draft EIS were based on the best information available and were not intended to be either optimistic or pessimistic. Those that have been questioned by others are being reviewed as part of the finalization process and will be supported by additional documentation in the Final EIS.

Oversight of assessing pedestrian movement (notably at Kalakaua/Kapiolani):

The intersection analyses conducted for the EIS TIAR include the high volume of pedestrians crossing at all of the affected intersections in the project's study area.

In response to your suggestion that the traffic study include Kapahulu, the WSA/TIA clearly demonstrates that this area is located well beyond the convention center's study area. The study area for the EIS TIAR which was established based upon the intersections anticipated to be most significantly impacted by convention center traffic. As demonstrated in the WSA/TIA, the intersections beyond our defined study area, such as the Kapiolani Boulevard/McCully Street and Ala Moana Boulevard/Kalia Road intersections, were not significantly impacted by convention center traffic. Further, any future increase of traffic on Kapahulu Avenue would be more appropriately addressed through the City's Waikiki Regional Traffic Impact Plan which is currently being prepared and

Mr. John Diercks
July 17, 1995
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anticipated for completion by August 1995. The study area limits for the City's regional study are the H-1 Freeway, Pensacola Street, Ala Moana Boulevard/Kalakaua Avenue, and Kapahulu Avenue. This study is intended to examine the regional traffic impacts and future roadway requirements of the area, including reevaluating the change in traffic circulation and patterns of the major streets in the area.

Similar to our previous response, your comment regarding synchronization of the traffic signals on Kuhio Avenue and Kapahulu Avenue, as well as Ala Moana Boulevard, would be more appropriately addressed through the City's Waikiki Regional Traffic Impact Plan.

Although your concerns regarding TheBus operations on Kuhio Avenue are well taken, please be advised that these concerns are not within the purview of the convention center EIS. Your concerns would be more appropriately directed to Oahu Transit Services, Inc., the private company contracted by the City and County of Honolulu to operate TheBus.

Likewise, your comments concerning police policy would be more appropriately directed to the City and County of Honolulu Police Department as the stated concerns are not within the purview of the convention center EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

I

Geoffrey Douglas
411 Hobron Lane, #2502
Honolulu, HI 96815
(808) 941-1228 (H)/541-2977 (B)

22 FEBRUARY
1995

To: THE CONVENTION CENTER AUTHORITY
841 BISHOP STREET ROOM 2000
HONOLULU, HAWAII, 96813.

THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE STATE'S CONVENTION CENTER WHICH IS TO BE BUILT ON THE OLD ALOHA MOTORS SITE ON THE FRINGE OF WAIKIKI INDICATES CLEARLY THERE WILL BE A SEVERE DETERIORATION IN THE RESIDENTIAL AMENITIES OF HIGH RISE HOMES IN THE AREA.

1. A FULL AND DETAILED REPORT ON THE PAST SEEPAGE OF OIL FROM THE MOTOR'S SITE INTO THE GROUND AND ITS CONTAMINATING EFFECT ON UNDERGROUND WATER SUPPLIES NEEDS TO BE PUBLISHED IN DETAIL AND BE OPEN TO QUESTIONS.

2. THE QUALITY OF AIR FOR LOCAL RESIDENTS IS BOUND TO SUFFER FROM INCREASED ROAD TRAFFIC IN THE AREA AND WILL BE A NEGATIVE AMENITY LONG AFTER THE CENTER IS BUILT UNLESS CONTROLS ON EXHAUST FUME POLLUTION ARE INSTITUTED.

3. LIKEWISE NOISE POLLUTION FROM TRAFFIC WILL BE A LONG TERM PROBLEM FOR THOSE WHO HAVE BOUGHT THEIR LONG TERM HOMES IN THE AREA.

4. PROPERTY TAX ASSESSMENTS WILL NEED TO BE ADJUSTED TO REFLECT THE LOWERING OF AMENITY STANDARDS.

5. ALL LOCAL RESIDENTS SHOULD RECEIVE FULL REPORTS ON THESE MATTERS AND THEIR CONCERNS SHOULD BE FULLY ADDRESSED.

ONE WOULD NOT WISH TO PLACE BARRIERS IN THE PATH OF PROGRESS NOR IN MUFU HANNEMANN'S VISION OF

Geoffrey Douglas
411 Hobron Lane, #2502
Honolulu, HI 96815
(808) 941-1228 (H)/541-2977 (B)

II

HAWAII AS AN INTERNATIONAL TRADE CENTER FOR THE PACIFIC, BUT THE LIFE STYLE OF LOCAL RESIDENTS HAS TO BE PRESERVED WHILST THE ALMOST IMPOSSIBLE WORK OF DEVELOPING MODERN INTERNATIONAL TRADE SUPPORT SERVICES FOR VISITING BUSINESS PEOPLE IS BEING CONSIDERED.

Geoffrey Douglas
(GEOFFREY N. DOUGLAS)

Convention Center Authority
Received

Number 432 Date 2/28/95
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Other: copy to Mark Hartley / Paul Weisburger

File under: DEIS COMMENT - C

Other issues: CONSENS - OIL / AIR / NOISE / TAXES



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Geoffrey Douglas
411 Hobron Lane, #2502
Honolulu, Hawaii 96815

Dear Mr. Douglas:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawai'i
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 22, 1995 commenting on the subject Draft EIS.

We disagree with your opinion that the Draft EIS on the convention center indicates there will be a severe deterioration in the residential amenities of high-rise homes in the area. We offer the following responses in the respective order of your comments:

1. Published reports on hazardous waste materials on the convention center site are available for public review at the State Department of Health (DOH) Solid and Hazardous Waste Branch.

For your information, the previous property owners of the project site have studied and removed/disposed of known hazardous waste materials on the site. In March 1992, the San Francisco (Region IX) office of the Environmental Protection Agency (EPA) recommended that "no further remedial action" was necessary under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). In April 1993, the State DOH issued a letter stating that based on their review and evaluation, "no further actions are necessary for the contaminants found in the test areas of the site." Because the potential of encountering contaminated soils and/or groundwater during construction exists, however, the design/builder will prepare a hazardous materials contingency plan to assure that all State and Federal requirements for remediation are complied with in the event that any further contamination is discovered during construction.

2. In the past 20 years, traffic in Honolulu has increased greatly, yet measured carbon monoxide (CO) levels have declined sharply due to stringent motor vehicle emission

Mr. Geoffrey Douglas
July 17, 1995
Page 2

standards for new cars. These newer, less polluting cars have gradually replaced the older, more polluting cars. Since Congress has mandated even more stringent motor vehicle standards for new cars, we can expect the same trend to continue. The air quality modeling conducted for the convention center predicted little change in CO levels near the busiest intersection due to this emission control program.

3. Based on the findings of the noise study prepared for the EIS, noise pollution from traffic will not be a significantly greater long-term problem for those who have bought their homes in the area than it would be without the convention center. According to the noise study, neighboring residential condominiums along the south side of the Ala Wai Canal (i.e., 1717 Ala Wai, Marina Towers, etc.) are predicted to experience no significant traffic noise impacts from the project, and are predicted to decrease in some cases due to the noise shielding effects of the convention center building.

Although traffic volumes along Kahakai Drive are expected to increase, total noise levels on the sides of Atkinson Plaza and The Summer Palace condominium buildings which face the project are not expected to increase significantly, and are predicted to decrease at the lower elevations due to the noise shielding effects of the project's building on noise from other major streets in the area.

Traffic noise levels along Atkinson Drive (vicinity of Sunset Tower condominium) are expected to increase by approximately 1 Ldn due to increases in project and non-project traffic.

Also, no significant traffic noise impacts are expected in the McCully area north and east of the project site (residences along Lime and Hauoli Streets and those along Kapiolani Boulevard in the vicinity of Lime and Hauoli Streets, and residences behind (east) the Veterans of Foreign Wars site). This is due to the relatively small changes in traffic noise expected along the section of Kalakaua Avenue north of the project site and along the section of Kapiolani Boulevard east of the project site.

Mr. Geoffrey Douglas
July 17, 1995
Page 3

Because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The State Convention Center Authority (CCA) will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

4. Property tax assessments may be adjusted up or down to reflect changing land and building values in the area. In fact, the social impact assessment for the EIS indicates that the presence of a convention center may enhance property values in the area. Consequently, property tax would increase.
5. Please be apprised that copies of the Final EIS document, to which the technical studies are appended, will be available in public libraries. Further, all written comments received on the Draft EIS will be responded to in writing by the CCA. The comment and response letters will be reproduced in the Final EIS document.

Your comment indicating that the lifestyle of local residents has to be preserved, while considering the work of developing modern international trade support services for visiting business people is acknowledged.

Mr. Geoffrey Douglas
July 17, 1995
Page 4

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

FEB 24 1995

To: -

Feb 22 '95

Convention Center Authority

Dear Sir:-

This is to advise I have lived in the "Convention Area" for approx 20 years. First @ Ala Moana Plaza, approx 7 years, and @ 1277 Ala Moana, approx 6 years and now residing @ 411 Hobron Lane - Chateau Waikiki.

I drive to and from Ward Warehouse to my home almost every day, going to work via Ala Moana Blvd and returning approx 4:00 to 5:00 PM via Kapiolani Blvd. When going to work approx 9:00 AM via Ala Moana Blvd, it usually takes 10 to 15 mins to travel approx 2 miles. However coming home via Kapiolani it takes anywhere from 15 min to 1/2 hour and the traffic as you near the convention site is bumper to bumper!

The selection of this site was by far the worst of any sites offered not only is the traffic going to get worse but the site approx 9 acres is too small to build an effective convention center.

During my life on the East coast mainland, I serviced many sales conventions setting up displays etc @ convention centers from Cincinnati to Atlantic City and may I say many-many trailer trucks are involved to set-up exhibits and other materials.

I strongly suggest, before it is too late, we should consider moving this to another site, with more land space available, before we have grid-lock @ Atkinson & Kapiolani & Kalia Avenues.

Your comments would be appreciated.

Convention Center Authority
Respectfully

Sincerely

Number 407 Date 2-24-95

Name Route Initials Code

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Copy:

copy to Ward - dated
and send to [unclear]

File under:

DES - COMMENTS - C

Other notes:

Action (Please diff response)
Thanks
Eler

E. R. GELFO, SR.
411 Hobron Lane, #710
Honolulu, HI 96815



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. E.R. Gelfo, Sr.
411 Hobron Lane, #710
Honolulu, Hawaii 96815

Dear Mr. Gelfo:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawai'i
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 22, 1995 commenting on the subject Draft EIS.

Your comments regarding your traffic experiences to/from work and your stated opinion that the traffic is going to get worse with the convention center at the selected site are acknowledged.

The traffic study prepared for the convention center EIS addresses the potential traffic impacts resulting from the convention center and identifies specific mitigation measures to reduce or minimize these impacts. Among the most important mitigation measures is the provision of an additional lane of traffic along Kapiolani Boulevard and Kalakaua Avenue, an additional lane along Atkinson Drive, and two additional traffic lanes along Kahakai Drive. All of these road widenings will be on the convention center property and, in combination, are anticipated to offset the impacts of additional traffic generated by the convention center.

Regarding your opinion that the selection of this site was by far the worst of any sites offered, please be apprised that exhaustive studies which analyzed a number of potential sites for a convention center have been conducted over the years. In addition to its close proximity to a high inventory of hotel rooms and commercial/retail businesses, the approximately 10-acre former Aloha Motors site is deemed adequate to accommodate a world-class convention center facility.

We acknowledge that pursuant to your previous experience with sales conventions in the Mainland, many trailer trucks are involved with the set-up of exhibits and other materials. The EIS traffic study indicates that about 50 container truckloads of freight may be needed to set up a major trade

Mr. E.R. Gelfo, Sr.
July 17, 1995
Page 2

show/convention that uses the entire exhibition hall floor, with the actual amount depending on the type of conventions, number of exhibitors, and the bulkiness of the displays and equipment. This truck activity is anticipated to occur on the one or two set-up days prior to and one or two move-out days following the event. Trucks are not anticipated to arrive or depart from the convention center during the morning and afternoon peak traffic periods. Further, the convention center's loading dock is contained entirely within the site at ground level adjacent to the Ala Wai Promenade, with provisions for a turnaround area, thus minimizing potential queuing of service vehicles back onto the street. To adequately accommodate required servicing, approximately 12 docks will be distributed across the length of the exhibit hall for easy access to each hall. Trucks delivering exhibits can also drive directly onto the exhibit hall to unload/load and leave via the Kahakai Drive or Kalakaua Avenue exits.

Regarding your suggestion to consider moving the convention center to another site with more available land space and to avoid potential gridlock on the adjacent streets, we reiterate our earlier responses that the subject site is adequate to accommodate a world-class convention center facility and that the convention center will mitigate its own traffic impacts.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 23, 1995

Alan Hayashi, Exec. Dir
Convention Center Authority
The State of Hawaii
1833 Kalakaua Ave., Suite 800
Honolulu, HI 96815

Dear Mr. Hayashi,

Please allow me to introduce myself. My name is Jeff Haveman and I'm the resident manager of The Summer Palace condominium. I relocated here from the Los Angeles area and assumed this position February the 14th of this year. Because I'm new to the island, I don't know all the history to the development of the Convention Center. I did, however, arrive in time to attend the March 9th meeting with the Convention Center Authority at the Ala Moana Hotel. I also examined the Environmental Impact Study that was published.

I couldn't believe what I was hearing when I discovered what the CCA was planning on doing and how it would so drastically effect The Summer Palace. At the meeting, the term "Good Neighbor" was used in context with the Convention Center. I've lived many places in this world and had many neighbors, but I've never encountered one like this. If this is a good neighbor, I'd hate to see a bad one.


Being a reasonable man, I understand we can not always choose our neighbors. If that is the case with the CC then we will live with it. I know its unrealistic to believe I will have a multi-million dollar park built next to my building. My purpose of this letter is to appeal to your goodness to take into consideration the impacts the CC will have on my building.

If something is not done about traffic in and out of Kahakai Dr., the residents will suffer greatly. I'm thinking of peak convention times, as well as, setting up and tearing down days. A reversal of the current traffic flow combined with widening the street seems to be the best solution to date. Street parking is already a nightmare, but that may only be effected during daylight hours when most people are at work anyway.

The service truck entrance and loading docks are my biggest concerns. This area of the complex will be only feet from my pool deck. I really don't see how anyone could plan for trash removal and service truck docks to be so close to such a recreational living area. Can you image stretching out on a chase lounge next to the pool and have a Mac or Peterbuilt chug by in low gear. I don't think so! Something, I don't know what, but something must be done to protect our space on the pool deck. I really can't imagine the Honolulu city clerk issuing a building permit to anyone that would violate ones space as this.

I do know, The Summer Palace could do much worst for a neighbor and I'm hoping the CC will bring the status of the neighborhood up. I do believe the investments the owners of Summer Palace made, will in fact increase, when all is said and done. I only trust that you and the CCA will listen to what the residents of the area are saying and make the CC the "Best Neighbor" it can be.

Sincerely,


Jeffrey L. Haveman
Resident Manager, The Summer Palace



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Jeffrey L. Haveman
1848 Kahakai Drive
Honolulu, Hawaii 96814

Dear Mr. Haveman:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Regarding your concern about traffic into and out of Kahakai Drive, please be apprised that the proposed design of Kahakai Drive is intended to facilitate vehicular ingress/egress for motorists travelling to the convention center, as well as the adjacent residential areas. The segment of Kahakai Drive adjacent to the convention center will be widened by an additional two traffic lanes to provide a total of four lanes (two inbound and two outbound lanes) and a 10-foot wide landscaped median. The two inbound lanes will separate convention center traffic from the residential traffic on Kahakai Drive. The left inbound lane will provide access to the convention center's parking garage and truck dock access, and the right inbound lane will provide access to the residential area of Kahakai Drive. The two outbound lanes will provide separate left- and right-turn lanes onto Atkinson Drive.

Also, a traffic signal will be installed at the intersection of Atkinson Drive and Kahakai Drive as part of the convention center project to facilitate vehicular movement into and out of Kahakai Drive. An exclusive left-turn lane into Kahakai Drive from Atkinson Drive will be provided for Kahakai residents and convention center traffic.

With these planned roadway improvements, the traffic study prepared for the EIS demonstrates that traffic ingressing and egressing Kahakai Drive during the larger convention events (10,000- to 14,000-person events) would operate at acceptable levels. During convention set-up and take-down days, the varying levels of truck, delivery vehicle, and service vehicle

Mr. Jeffrey L. Haveman
July 17, 1995
Page 2

activity should not have any significant impact on area traffic conditions since this would occur primarily on days with no on-going conventions. The truck movements could occasionally affect traffic flow along Kahakai Drive as vehicles enter/exit this street, although such inconveniences would be of short duration. Further, trucks are not anticipated to arrive or depart from the convention center during the morning and afternoon peak traffic periods.

In response to your suggestion of reversing the current traffic flow on Kahakai Drive, we would like to point out that reversing the circulation of the internal loop street would likely result in the elimination of about two on-street parking spaces on the loop portion near Kahakai Drive to provide for adequate emergency vehicle access. Also, motorists traveling Waikiki-bound on Kahakai Drive who do not intend to access the convention center would be unable to turn around should they inadvertently bypass the loop street. They would be forced to enter the convention center or Summer Palace parking garage, unless a turnaround area was provided at the end of Kahakai Drive.

Regarding street parking on Kahakai Drive, parking on the makai side of Kahakai Drive (5 spaces) would be restricted during large convention events to provide for two inbound lanes.

Your concerns regarding the convention center's service truck entrance and loading dock area are understandable. However, the loading dock is fully enclosed and is contained entirely within the convention center site at ground level adjacent to the Ala Wai Promenade. All truck loading/unloading activities, as well as trash removal, will occur within the loading dock area which is designed with provisions for a turnaround area. Also, due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is

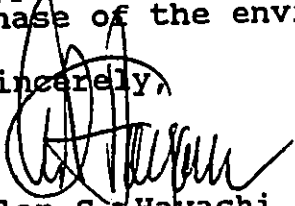
Mr. Jeffrey L. Haveman
July 17, 1995
Page 3

unresolved at this time and will be identified as such in the Final EIS.

Consistent with your concerns that the Convention Center Authority (CCA) listen to the area residents and be the best neighbor possible, we note that the CCA has participated in a number of public meetings on the Draft EIS which were intended to allow the public an opportunity to air their concerns. The CCA will continue to address concerns which may arise during development of the convention center. Furthermore, the project's design/builder, Nordic/PCL, will establish a hotline to respond to concerns raised during the convention center's construction phase.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Convention Center Authority
841 Bishop St.
Room 2222
Honolulu, Hi. 96813

COPY

Feb. 22 1995

Dear Sirs,

The headline in the Honolulu Advertiser on February 20, 1995 which states "CENTER WILL ADD MINUTE TO TRAFFIC" is a joke. There is no way that the present traffic problems won't be increased by the building of a Convention Center. We don't need a Convention Center to add to our woes. Please pack your bags and go away.

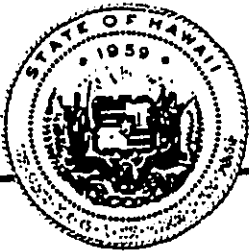
Sincerely,

C. Sumner Hayward
C. SUMNER HAYWARD
Frances E. Hayward
FRANCES E. HAYWARD
647 N. Kainalu Dr.
Kailua, Hi. 96734

Convention Center Authority
Received

Number 431 Date 2/28/95
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Other: *copy to Mark [unclear] Paul [unclear]*

DES COMMENTS - C
OBJECTIONS TO TRAFFIC



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. C. Sumner and Ms. Frances E. Hayward
647 North Kainalu Drive
Kailua, Hawaii 96734

Dear Mr. and Ms. Hayward:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 22, 1995
commenting on the subject Draft EIS.

Regarding your opinion, we would like to provide clarification
to the referenced Honolulu Advertiser's article headline
(February 20, 1995) that the convention center would add one
minute to traffic. This reference was made to the traffic
delays at the intersection of Kalakaua Avenue and Kapiolani
Boulevard. If the convention center were not built, the
average delay at the Kapiolani/Kalakaua intersection would be
53.9 seconds per vehicle. During a 14,000-person event at the
convention center, the intersection delay would increase to
62.9 seconds per vehicle under existing roadway conditions.
The traffic improvements proposed in the EIS traffic study
would reduce the average delay to 54.1 seconds per vehicle.
If we extend the comparison further, the delay on "dark days"
(convention set-up and take-down times with no events) would
be 44.7 seconds per vehicle, which is considerably better than
if the convention center were not built.

The traffic study prepared for the convention center EIS
addresses the potential traffic impacts resulting from the
convention center and identifies specific mitigation measures
(i.e., lane widenings on adjacent streets, traffic coning, and
on-street parking restrictions) to reduce or minimize these
impacts. The traffic mitigation measures proposed for the
convention center are intended to mitigate such impacts to the
degree that conditions are comparable to that of the no-
project scenario.

Mr. C. Sumner and Ms. Frances E. Hayward
July 17, 1995
Page 2

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Heuett

1720 Ala Moana Blvd
Honolulu 96815



Attn. Alan Hagiashi USA 19
Convention Center Authority
841 Bishop St Suite 2222
Honolulu HI 96813

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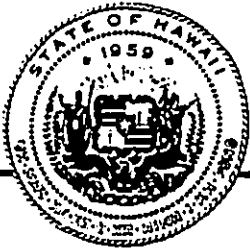
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Environmental Impact Statement input on Convention Center -

Traffic will be slowed more than 1 minute! The cars already make turning left to cross the canal towards Waikiki in the afternoon impossible - congested already!

Rent is being raised at Tradewinds Mauna -- probably because of proximity to Convention Center. With layoffs and high costs, rent on a studio from 620 to 660 becomes unaffordable! Keep Hobron Lane low to ground ^{residential} &

The neighborhood will not be improved - we need more greenspace (oxygen) not less! Why look like NY or Tokyo? People come here for palm trees & sunshine. Convention centers could go in existing hotels & spaces along beaches, Aloha Towers, etc. Jot Heuett



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Joy Hewett
1720 Ala Moana Boulevard, E301
Honolulu, Hawaii 96815

Dear Ms. Hewett:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter commenting on the subject Draft EIS.

We acknowledge your comment regarding the existing traffic conditions in the vicinity of the Ala Wai Canal. The traffic study prepared for the convention center EIS addresses the potential traffic impacts resulting from the convention center and identifies specific mitigation measures (i.e., lane widenings on adjacent streets, traffic coning, and on-street parking restrictions) to reduce or minimize these impacts.

We would like to provide clarification to your comment that traffic will be slowed more than one minute. We presume that your comment was based on the convention center article which appeared in the February 20, 1995 edition of the Honolulu Advertiser. This reference was made to the traffic delays at the intersection of Kalakaua Avenue and Kapiolani Boulevard. If the convention center were not built, the average delay at the Kapiolani/Kalakaua intersection would be 53.9 seconds per vehicle. During a 14,000-person event at the convention center, the intersection delay would increase to 62.9 seconds per vehicle under existing roadway conditions. The traffic improvements proposed in the EIS traffic study would reduce the average delay to 54.1 seconds per vehicle. If we extend the comparison further, the delay on "dark days" (convention set-up and take-down times with no events) would be 44.7 seconds per vehicle, which is considerably better than if the convention center were not built.

We further acknowledge your concerns regarding increased rents and your preference to keep the Hobron Lane area low to the ground and residential.

Ms. Joy Hewett
July 17, 1995
Page 2

Your opinion indicating that the neighborhood will not be improved and the need for more green space is acknowledged. Regarding your comment that conventions could go into existing hotels, we note that various hotels which do have meeting facilities can only accommodate the smaller conventions or conferences due to size constraints. On the other hand, the proposed convention center will provide sufficient exhibition space necessary to attract and accommodate the larger national and international conventions. Regarding your comment that the convention center could be located along the beach, please be apprised that exhaustive studies which analyzed a number of potential sites for a convention center have been conducted over the years. The cost of acquiring prime beach front property is prohibitive and the use of beach fronting public land would displace prime public recreational areas.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

POSTED
3/25/95

Gary Gill, Director
State of Hawaii
Of. Environmental Quality Control
220 So. King St., 4th Floor
Honolulu, Hawaii 96813.

RECEIVED

95 MAR 28 11:47

OFF. OF ENVIRONMENTAL
QUALITY CONTROL

March 23, 1995

Dear Mr. Gill

I am writing with my concern about the convention center project and its impacts on the surrounding area.

I am a resident of the Kahakai Drive residential community. I would like to know how the traffic ingress and egress problems will be resolved with respect to the convention center project. How will the access to our property be guaranteed to remain clear at all times both for us and for fire trucks and rescue paramedics.

I object to the sidewalks being removed from Kahakai Drive along the convention center. We must use that sidewalk on a daily basis.

I object to the noise and fumes that will accompany the truck road that is planned for the convention center property. We would like the roadway completely enclosed so that our quality of life will not be degraded.

How will the convention center parking deck be shielded from the pool and recreation deck of our building?

Is there enough budget allowed to take care of these problems that will seriously affect our lives?

Please send me your written response. Thank you.

Yours truly,

Gileen Lan



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Eileen Lau
1848 Kahakai Drive
Honolulu, Hawaii 96814

Dear Ms. Lau:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 to Mr. Gary Gill, Director of the State of Hawaii Office of Environmental Quality Control, commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

Regarding your identity as a resident of the Kahakai Drive residential community, we presume that you reside in The Summer Palace condominium (your address did not appear on the copy of the letter we received) and that you are concerned about impacts of the convention center on The Summer Palace.

The traffic study prepared for the convention center EIS addresses the potential traffic impacts resulting from the convention center and identifies specific mitigation measures to reduce or minimize these impacts.

Regarding your inquiry about how access to The Summer Palace condominium will be guaranteed to remain clear at all times for both condominium residents and emergency vehicles, please be apprised that the proposed design of Kahakai Drive is intended to facilitate vehicular ingress/egress for motorists travelling to the convention center, as well as the adjacent residential areas. The segment of Kahakai Drive adjacent to the convention center will be widened by an additional two traffic lanes to provide a total of four lanes (two inbound and two outbound lanes) and a 10-foot wide landscaped median. The two inbound lanes will separate convention center traffic from the residential traffic on Kahakai Drive. The left inbound lane will provide access to the convention center's parking garage and truck dock access, and the right inbound lane will provide access to the residential area of Kahakai Drive. The two outbound lanes will provide separate left- and right-turn lanes onto Atkinson Drive.

Ms. Eileen Lau
July 17, 1995
Page 2

Also, a traffic signal will be installed at the intersection of Atkinson Drive and Kahakai Drive as part of the convention center project to facilitate vehicular movement into and out of Kahakai Drive. An exclusive left-turn lane into Kahakai Drive from Atkinson Drive will be provided for Kahakai residents and convention center traffic.

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive, by the Atkinson Plaza condominium, and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

We presume that your reference to "the truck road that is planned for the convention center property" addresses the on-site truck access located along Kahakai Drive between the Center's entry parking ramp and the corner of the truck dock nearest The Summer Palace condominium. Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between

Ms. Eileen Lau
July 17, 1995
Page 3

the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

As part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace condominium.

Our previous responses indicate how the Convention Center Authority will solve or mitigate the concerns you identified. Please be apprised that these mitigation measures will be implemented pursuant to the \$350 million established by Legislative H.B. No. S7-93, which provided a mechanism for selecting a site and financing the development of a convention center facility. The bill approved raising the five percent hotel room tax to six percent to raise the \$350 million to enable the payment of the bond debt.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

1212 Nuuanu Ave., Apt. 1201
Honolulu, HI 96817

February 16, 1995

RECEIVED
FEB 21 1995

Alan S. Hayashi, Executive Director
Hawaii Convention Center Authority
841 Bishop Street, Room 2222
Honolulu, HI 96813

WILSON OKAMOTO

Dear Mr. Hayashi

Subj: Convention Center Draft EIS

The draft EIS says on page 5-42 that the proposed project will impact the Ala Wai Promenade by improving the portion nearest the convention center and concludes without much analysis that the impact will be positive.

The proposed improvements are described as a stairway extending 26 feet into the Promenade (page 2-11), some triangular raised planters, and a pond (figures 2-3 and 2-5). The stairway appears to be about 100 feet wide, there are 11 planters at about 200 square feet each, and the pond looks about 50 feet wide extending 26 feet into the Promenade. These proposed encroachments total about 6,000 square feet.

The charm of Ala Wai Promenade depends its casual character as a place for strolling and jogging. Intensive landscaping improvements for the portion next to the convention center will detract from the unified appearance of the Promenade from Kalakaua Avenue to Ala Moana Boulevard.

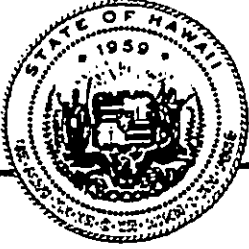
Possible mitigating measures are to delete the stairway, planters and pond from the proposed project, to reduce the size of the proposed stairway, and to landscape the full length of the Promenade. Another possibility would be to dedicate 6,000 square feet of improved park at another location for neighborhood residents.

Very truly yours,

Charles F. McClure

Charles F. McClure

cc: OEQC
✓ Wilson/Okamoto



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Charles F. McClure
1212 Nuuanu Avenue, Apt. 1201
Honolulu, Hawaii 96817

Dear Mr. McClure:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii...
Tax Map Key: 2-3-35: 01

This is in response to your letter dated February 16, 1995
commenting on the subject Draft EIS.

Based on comments received on the Draft EIS, as well as
discussions with the State Historic Preservation Division
(SHPD), the design of the Hawai'i Convention Center has been
revised to remove any encroachment of the stairway or any
portion of the convention center structure, including the
planters and pond, in the Ala Wai Promenade.

The SHPD will also be considering the visual impact of the
convention center structure, although it is not encroaching on
the Promenade, on the historic character of the Promenade,
pursuant to Section 106 of the National Historic Preservation
Act. Furthermore, the SHPD will be considering the impact of
paved walkways, lighting, landscaping, and street furniture
extending from the stairway onto the Promenade. In general,
it is our understanding that the SHPD considers pedestrian use
of the Promenade to be consistent with its historic character
but that improvements should be kept to a minimum. The
current discussion focuses on what the maximum width of
walkways should be and what other improvements would be
appropriate. The Final EIS will discuss the SHPD's Section
106 review of the various aspects of the convention center's
impact on the Ala Wai Promenade.

Mr. Charles F. McClure
July 17, 1995
Page 2

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

POSTED
3/29/95

RECEIVED

Gary Gill, Director
State of Hawaii
Of. Environmental Quality Control
220 So. King St., 4th Floor
Honolulu, Hawaii 96813.

'95 MAR 30 P1:33

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

March 23, 1995

Dear Mr. Gill

I am writing with my concern about the convention center project and its impacts on the surrounding area.

I am a resident of the Kahakai Drive residential community. I would like to know how the traffic ingress and egress problems will be resolved with respect to the convention center project. How will the access to our property be guaranteed to remain clear at all times both for us and for fire trucks and rescue paramedics.

I object to the sidewalks being removed from Kahakai Drive along the convention center. We must use that sidewalk on a daily basis.

I object to the noise and fumes that will accompany the truck road that is planned for the convention center property.

How will construction vehicles be managed while entering and exiting the site in the morning and evening?.

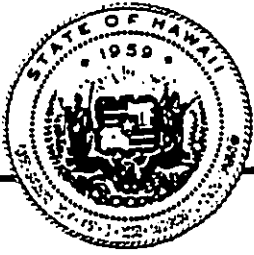
How will the convention center parking deck be shielded from the pool and recreation deck of our building?

Is there enough budget allowed to take care of these problems that will seriously affect our lives?

Please send me your written response. Thank you.

Yours truly,

Jojo Nakagawa
1848 Kahakai Dr., #2202
Honolulu, HI 96814



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Togo Nakagawa
1848 Kahakai Drive, #2202
Honolulu, Hawaii 96814

Dear Mr. Nakagawa:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 to Mr. Gary Gill, Director of the State of Hawaii Office of Environmental Quality Control, commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

The traffic study prepared for the convention center EIS addresses the potential traffic impacts resulting from the convention center and identifies specific mitigation measures to reduce or minimize these impacts.

Regarding your inquiry about how access to The Summer Palace condominium will be guaranteed to remain clear at all times for both condominium residents and emergency vehicles, please be apprised that the proposed design of Kahakai Drive is intended to facilitate vehicular ingress/egress for motorists travelling to the convention center, as well as the adjacent residential areas. The segment of Kahakai Drive adjacent to the convention center will be widened by an additional two traffic lanes to provide a total of four lanes (two inbound and two outbound lanes) and a 10-foot wide landscaped median. The two inbound lanes will separate convention center traffic from the residential traffic on Kahakai Drive. The left inbound lane will provide access to the convention center's parking garage and truck dock access, and the right inbound lane will provide access to the residential area of Kahakai Drive. The two outbound lanes will provide separate left- and right-turn lanes onto Atkinson Drive.

Also, a traffic signal will be installed at the intersection of Atkinson Drive and Kahakai Drive as part of the convention center project to facilitate vehicular movement into and out of Kahakai Drive. An exclusive left-turn lane into Kahakai

Mr. Togo Nakagawa
July 17, 1995
Page 2

Drive from Atkinson Drive will be provided for Kahakai residents and convention center traffic.

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive, by the Atkinson Plaza condominium, and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

We presume that your reference to "the truck road that is planned for the convention center property" addresses the on-site truck access located along Kahakai Drive between the Center's entry parking ramp and the corner of the truck dock nearest The Summer Palace condominium. Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be

Mr. Togo Nakagawa
July 17, 1995
Page 3

considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final BIS.

To avoid potential traffic congestion, movement of construction vehicles to and from the project site will be restricted during the morning and afternoon peak traffic periods. Flagmen or off-duty police officers will be employed to direct traffic during significant phases of construction to minimize traffic congestion.

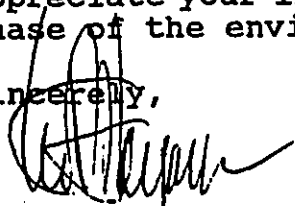
As part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may otherwise be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace condominium.

Our previous responses indicate how the Convention Center Authority will solve or mitigate the concerns you identified. Please be apprised that these mitigation measures will be implemented pursuant to the \$350 million established by Legislative H.B. No. S7-93, which provided a mechanism for selecting a site and financing the development of a convention center facility. The bill approved raising the five percent hotel room tax to six percent to raise the \$350 million to enable payment of the bond debt.

Mr. Togo Nakagawa
July 17, 1995
Page 4

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

Francis A. Nalbach
1429 Liholiho St.
Apt. 6
Honolulu, HI 96822



March 20, 1995

Convention Center Authority
841 Bishop St., Suite 2222
Honolulu, HI 96813

Attention: Mr. Alan Hayashi

Gentlemen:

Here are comments on the Draft EIS concerning the Convention Center at the Aloha Motors site. On March 14, 1995, I presented most of these comments in oral testimony at the hearing at the S.O.T.

I have operated a para-transit company for 23 years (taxi & tours) holding both city and state permits. I also served on the city Transportation Task Force as a member of the transit/para-transit committee and chair of the highway capacity committee. I consider my background and having driven the route to the center site for more years than I want to remember, to make me qualified to have my comments considered.

First, I feel that government should help its citizens attain the highest level of comfort possible. Here you have a government action that violates that very principle by impacting the many residents in the vicinity of the center and the ruination of the quality of life for the people living in the Atkinson-Kahakai corridor. Primary concerns are noise, safety and traffic.

Trucks will be used for the set up and take down of whatever the exhibitors need but you say the impact will be slight because they will do their work in off hours and off days. Buses will be used in transporting conventioners to and from the site. Have you ever heard a quiet truck or bus? And off hours might mean "no sleep".

Safety is a great concern. I have attended the meeting at Washington Intermediate as well as the S.O.T. and I have not heard from the fire department as to how they would handle an emergency at Kahakai during an event or even the set up or take down. I have yet to hear from the emergency medical services people as to how access for ambulances will be maintained for prompt response.

My prime concern is for the traffic impact. You certainly will try to get the large groups to come. This includes many that have come before so we know them and they know us. This includes the associations of the realtors, bar, dental, medical, bankers and social groups like the Elks and Lions. You say that you only expect one of these mega events each three years. This is not a reasonable expectation. Whoever markets the center will have to try to get as many as they can and as often as they will come. To expect any less is unreal. The reason for the center is to fill hotel rooms and help our visitor industry. We therefore, expect maximum promotion.

Nalbach to Conv Ctr page 2. - - - - -

I have looked at a 14,000 group convention. I assume that many will stay at the Ala Moana, Hawaii Prince, Ilikai, Hawaiian Village and other smaller hotels on Ala Moana such as Holiday Inn, Inn on the Park, Alana, etc. I will generously concede that maybe 4,000 will walk. That leaves 10,000 to use public transport. Based on facts from many years of association with SIDA taxi, who has moved as many as 8,000 conventioners, I offer a 60/40 split of taxi and bus users.

6,000 taxi riders, 4 to a cab will mean 1,500 trips per hour.
4,000 bus riders, 50 to a bus will mean 160 trips in that same hour. The cabs can make 3 trips per hour so 500 would be used but the three trips is the same as 1,500 in that hour period. The buses can make two trips in that hour so the 80 buses used would be equal to 160 on the road.

The big concern here is that these assumptions go out the window if only 1, 2, or 3 persons use a cab and that the buses are not filled to capacity. Anything less than optimum will mean ever more gridlock.

The route used from anywhere in Waikiki is via Ala Wai, Niu, Ala Moana, Atkinson to Kahakai. Can you just see how the existing roads can handle this additional traffic? The allocated 6 bus berths and what you assign taxis will be inadequate to handle it. You might just as well plan on a holding area in Ala Moana Park to stack the waiting buses.

You say that buses can be loaded and unloaded allowing 2 seconds per person. I have ridden a full bus to a luau and it takes almost 5 minutes to unload a full bus and that makes your calculations based on 100 seconds wishful thinking. You also allocate 3 minutes 45 seconds to the drive in, unload and leave cycle of a bus, saying that they will be arriving at 30 second intervals. With traffic the way it is and the way it will be, such assumptions are unrealistic at best. With present traffic plus 160 bus trips and 1,500 taxi trips, all on the same route, leads me to conclude that whoever came up with these numbers has not driven this route even now, without the impact of added vehicles. I challenge any member of your team to dispatch even taxis from various parts of Waikiki and get them to the site on 30 second headways. You say you can do that with 80 buses making 2 trips an hour. I say, "Prove it!"

I'm afraid you will have to live with the dark days without any smaller convention to take up the slack. For example, this year we have had several groups that come to mind. Hawaii Internet, 4,200 pax at the Sheraton Waikiki; Independent Bankers, 2,400 at the Hawaiian Village and General contractors, 4,200 at the Hawaiian Village. If they are staying at the hotel and the hotel can accommodate their meetings, why would they want to use the convention center and the inconvenience of leaving the comfort of the hotel property? Your estimates of 3 groups of 10,000 per year are seemingly soft and hopes for 150 days a year of 5,000 to 7,500 is highly questionable.

Nalbach to Conv Ctr page 3- - - - -

You propose certain traffic mitigation steps. Among them are road widening, traffic light signals and event related measures such as coning and parking restrictions. You further mention a one lane widening on Kahakai but we are living in pain with the other items mentioned and they do no good relieving the present mess so how can we expect improvement later on. I say, if you can improve traffic flow with tinkering with the lights and coning, do it now and prove it.

One last comment about traffic delays. The methodology used seems to be only related to getting through the intersection once you have arrived at it. It does not consider how long you are delayed getting to it. Your examples talk of seconds. Practically, we are really talking minutes. Whoever, made these statements has not properly explained what he means. If he drove the route today, he would find delays of many minutes for the whole trip, not just seconds getting through an intersection.

How anything relating to traffic can be considered without the regional report from the city is beyond me. At least, let's wait for that and see what they offer. If it's not any better than what your EIS reports, than let's go back to the drawing board and maybe suggest, if we need it at all, let's consider a different site. A neighbor island comes to mind as well as Fort Armstrong which the state already owns and that certainly would relieve part of the financial burden.

Sincerely,


Francis A. Nalbach

Copy to: ✓ Wilson Okamoto & Associates, Inc.
1907 South Beretania St.
Honolulu, HI 96826
Attn: Mr. Earl Matsukawa

Office of Environmental Control
220 South King St., 4th Floor
Honolulu, HI 96813
Attn: Mr. Gary Gill



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Francis A. Nalbach
1429 Liholiho Street, Apt. 6
Honolulu, Hawaii 96822

Dear Mr. Nalbach:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 20, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

We acknowledge your credentials as a former para-transit operator and member of the City's transit/para-transit committee and chair of the highway capacity committee.

Although we acknowledge that a facility such as a convention center will have an impact on residents in the vicinity, we disagree that this action violates the principle of government helping its citizens attain the highest level of comfort, and that it will ruin the quality of life for those living in the Atkinson/Kahakai corridor.

As indicated in the EIS noise study, because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that

Mr. Francis A. Nalbach
July 17, 1995
Page 2

the future convention center operator establish operating procedures for heavy trucks within the Center. Such procedures will be similar to those described for shuttle buses above.

Regarding your concerns about the Fire Department, please be apprised that the design/build team is closely coordinating the convention center plans with the Department. Also, the Fire Department has submitted written comments for both the environmental assessment and Draft EIS process for the convention center. In addition to complying with Article 10 of the Uniform Fire Code, construction plans of the convention center will be submitted to the Fire Department and City Building Department for review and approval prior to commencement of the project.

Regarding your concern about maintaining access for prompt response of emergency medical vehicles, please be apprised that among the most important project mitigation measures is the provision of an additional lane of traffic along Kalakaua Avenue and Kapiolani Boulevard, an additional lane along Atkinson Drive, and two (2) additional traffic lanes along Kahakai Drive to accommodate convention center traffic. All of these road widenings will be on the convention center property and, in combination, are anticipated to offset the impacts of traffic created by the convention center during peak traffic hours. Further, as required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic and emergency vehicles during convention events.

We acknowledge that your prime concern is with traffic impact. As indicated in the EIS traffic study, the State Convention Center Authority (CCA) intends that the primary users of the convention center will be national and international conventions, trade shows, exhibitions, and meetings. Such events are expected to attract from 2,000 to 14,000 attendees during the two- to four-day duration typical for such events.

According to the CCA, it would be rare for the convention center to host conventions much larger than 14,000 delegates, considering the size of the exhibition hall and the number of hotel rooms in Waikiki. For example, the 200,000-square foot exhibit hall could accommodate a maximum of about 20,000 persons, provided the entire exhibit hall is used and there

Mr. Francis A. Nalbach
July 17, 1995
Page 3

are no exhibits. However, it is extremely rare that conventions would not have exhibits. Further, for the very large conventions (i.e., 30,000 persons), provisions are never made to accommodate the total number of registered delegates at the convention center on any one day due to facility constraints. Rather, various concurrent programs are provided, such as conferences, exhibits, and tours of the town where attendees are scheduled to rotate among these various activities over the duration of the convention.

We concur that the primary benefit of the convention center is to increase and stabilize hotel occupancy in existing Waikiki hotels. In terms of trying to attract the larger conventions to the Hawai'i Convention Center as often as they will come, it should be noted that most associations or organizations tend to hold their conventions at various regional destinations throughout the nation or world on a rotational basis.

You present a scenario for a 14,000-person convention using travel mode split assumptions, with a very high percentage (60 percent) assumed to ride taxis based on your many years of experience with SIDA Taxi. However, we note that without the benefit of a large convention center facility, the "larger" conventions that in the past have been held in Waikiki likely required the use of several facilities located at various hotels. Therefore, given this situation, conventioners would be more likely to use taxis to travel between the various hotel facilities. However, with a world-class convention center facility, it would now be feasible to provide a cost-effective shuttle bus transportation system between the convention center and Waikiki hotels.

Also, your scenario assumes that all 14,000 conventioners will be travelling to the convention center at one time. On the other hand, the travel mode split assumptions used in the EIS traffic study are based on the number of attendees assumed to arrive during the AM peak hour on a peak convention day. It should be noted that the travel forecast assumptions and modal shares used in the EIS traffic study were developed pursuant to discussions with persons with extensive experience in convention center operations across the nation and those associated with major Waikiki hotels which host convention events.

Mr. Francis A. Nalbach
July 17, 1995
Page 4

While your scenario appears to assume that all 14,000 conventioners are Oahu visitor attendees, the analysis of the 14,000-person convention in the EIS traffic study assumes that local residents typically comprise 5 percent (700 persons) of attendees of national conventions held in Honolulu. The remaining 95 percent (13,300 persons) are Oahu visitor attendees. On a typical high-usage day, 80 percent of the registered conventioners (11,200 persons) are assumed to attend events at the convention center. Of the daily attendees, 80 percent (8,960 persons) would arrive during the AM peak hour. Of this, 5 percent (448 persons) are local resident attendees and 95 percent (8,512 persons) are Oahu visitor attendees.

Your scenario assumes that of the 14,000 Oahu visitor conventioners, 4,000 will walk, with 6,000 using the taxi and the remaining 4,000 riding the shuttle buses. In contrast, the EIS traffic study assumes that 10 percent of Oahu visitor attendees (851 persons) arriving during the AM peak hour would walk. The 10 percent walk mode split is based on the acceptable walking time (10 minutes) and the number of hotel rooms located within that walking distance. The EIS traffic study also assumes that 70 percent of Oahu visitor attendees (5,958 persons) arriving during the AM peak hour would ride shuttle buses (assuming maximum capacity of 49 passengers per bus). This percentage is similar to the ratio achieved by mainland convention centers without adjacent hotel complexes. Also, 5 percent of Oahu visitor attendees (426 persons) arriving during the AM peak hour are assumed to use taxis to travel to the convention center, with an average of 2.3 persons per vehicle. These would be conventioners who would likely be staying at outlying hotels within Waikiki which are not served by shuttle buses or are not located within close proximity to hotels that provide shuttle bus service, or those who would be carrying material or other items to the convention center. This percentage of Oahu visitor attendees assumed to use taxis is comparable with the results of a travel mode analysis conducted at the Honolulu International Airport wherein about 6 percent of Oahu visitors from domestic destinations use a taxi. The remaining Oahu visitor attendees are assumed to use private automobiles (5 percent or 426 persons) and public bus (10 percent or 851 persons).

Based on the above study assumptions, the EIS traffic study demonstrates that the convention center traffic will operate

Mr. Francis A. Nalbach
July 17, 1995
Page 5

at acceptable levels with the proposed roadway improvements and recommended operational traffic measures.

Regarding your question about the adequacy of existing roads to handle the additional convention center traffic from Waikiki, we reiterate our previous response that the EIS traffic study demonstrates how the convention center traffic will operate at acceptable levels with the proposed roadway improvements and recommended operational traffic measures. You indicate that the allocated six bus berths and assigned taxi space at the convention center will be inadequate to handle the anticipated traffic. According to the EIS traffic study, for a 14,000-person convention, the six bus berths provided at the main entry drive fronting the convention center lobby should be adequate to accommodate the projected number of shuttle bus trips (122) during the heavier AM peak hour under normal conditions. Also, the two additional on-street bus berths along the proposed widened portion of Atkinson Drive fronting the project site would be able to accommodate an additional 50 bus trips per peak hour. Furthermore, if necessary, up to 20 shuttle buses can be staged within the truck dock area located entirely within the convention center site. In addition to the six taxi/passenger vehicle drop-off/pick-up spaces in front of the lobby area, another passenger drop-off/pick-up area for taxis and private and rental vehicles will be provided within the parking garage of the convention center.

We would like to clarify that according to the EIS traffic study, traffic industry standards estimate an average of 2.0 seconds per alighting (disembarking) passenger and 3.0 seconds per boarding passenger. Also, we would like to further clarify that the 30-second headway is an "average" arrival rate. About your expressed doubts regarding the respective total passenger loading/unloading time, we would like to inform you that an actual shuttle bus passenger loading/unloading operation was videotaped to demonstrate actual dwell times. The operation involved passengers loading onto shuttle buses at a hotel in San Diego, California destined for a theater event, and the same passengers unloading from the buses at the hotel after the event. Many of the buses contained close to capacity number of passengers (49). The shuttle bus operation was directed by convention transportation planner S.E.A.T. Planners, Inc. of San Diego. The videotape demonstrated that it took an average dwell time

Mr. Francis A. Nalbach
July 17, 1995
Page 6

of 2 minutes 30 seconds to load a bus of 45 passengers, and 2 minutes 45 seconds to unload a bus of 48 passengers.

We would like to point out that the livelihood of convention transportation consultants such as S.E.A.T. Planners is wholly dependent on successfully transporting conventioners between host hotels and convention centers in a timely and efficient manner. Likewise, the reputation of any convention center is also dependent on ensuring convenient and efficient transportation service to conventioners.

We would like to clarify that the "dark days" are the respective one or two set-up/take-down days before and after a convention event. National and local convention events involving 5,000 or fewer participants are likely to continue using existing hotel convention facilities throughout the State. It should be noted that the Hawai'i Convention Center is not intended to compete with hotel facilities. Most of the conventions anticipated to use the new facility will be groups averaging between 6,200 and 7,500 persons.

We would like to clarify that the segment of Kahakai Drive adjacent to the convention center will be widened by an additional two traffic lanes and not one lane, as indicated in your letter. Also, we do not understand the basis for your comment that "we are living in pain with the other items mentioned" (proposed traffic mitigation) "and they do no good relieving the present mess so how can we expect improvement later on." You further go on to say "if you can improve traffic flow with tinkering with the lights and coning, do it now and prove it." First, the proposed roadway improvements (lane widening and traffic signals) will be constructed as part of the convention center project. The roadway improvements are intended to mitigate the convention center traffic impacts and not the present existing conditions. Secondly, the coning and parking restrictions are convention center event-related and are not applicable to existing traffic conditions.

According to the *Manual of Transportation Engineering Studies*, Institute of Transportation Engineers, the Highway Capacity Manual (HCM) methodology used in the EIS traffic study is a generally accepted and widely used technique for traffic impact analysis. In accordance with your comment regarding traffic delays, the HCM methodology is intended to calculate

Mr. Francis A. Nalbach
July 17, 1995
Page 7

intersection delay and not overall travel time delay. The purpose of the methodology in traffic impact analysis is to measure the project-related traffic impacts and the effectiveness of the proposed mitigation measures.

The purpose of the EIS traffic study is to identify potential traffic and transportation-related impacts resulting from the convention center and to identify appropriate mitigation measures. On the other hand, the Waikiki Regional Traffic Impact Plan is intended to analyze traffic impacts of existing and future conditions in the region, including the convention center project, and to recommend mitigation measures for overall traffic impacts in the area (including those which would be the responsibility of the State). The Waikiki Regional Traffic Impact Plan is anticipated to be completed by August 1995. The CCA has participated in a number of meetings with the City Department of Transportation Services regarding the two studies, wherein it was agreed that the City would incorporate the traffic data from the convention center's traffic study into its regional study. Further, the CCA will continue its active participation in the City's Waikiki Regional Traffic Impact Plan through its role as a task force member.

Regarding your suggestion of potentially going back to the drawing board and considering a different site for the convention center if the City's regional traffic study is not any better than the EIS traffic study, we note that the Aloha Motors site has long been regarded as a primary site for the Center. Unlike the Neighbor Islands, a primary consideration of the Aloha Motors site is its proximity to a high inventory of hotel rooms and commercial/retail businesses.


You also mention Fort Armstrong as a potential alternative site for the convention center. We note that exhaustive studies which analyzed a number of potential sites for a convention center, including the Fort Armstrong/Kakaako waterfront area, have been conducted over the years. However, the underlying criteria was that the convention center would need to be located in proximity to a high inventory of hotel rooms and, as such, a location near Waikiki was logically preferred. Given the distance of the Fort Armstrong/Kakaako waterfront area to Waikiki, location of a convention center in that area would have required development of hotels in the vicinity. In turn, this would have raised complex issues with respect to land uses in the Kakaako area. Also, a convention

Mr. Francis A. Nalbach
July 17, 1995
Page 8

center at the Fort Armstrong or Kakaako waterfront area would likewise create traffic problems, if not more so than at the Aloha Motors site. In a written response to a suggestion by the Neighbors of the Ala Wai that the convention center be located at the Kakaako waterfront area, Mr. Kazu Hayashida, Director of the State Department of Transportation, indicated that the following traffic conditions would likely occur: 1) more shuttle bus trips would be needed because practically no tourists would walk to conventions; 2) shuttle buses from Waikiki would travel westbound on Ala Moana Boulevard and turn left to the Kakaako waterfront area; and 3) traffic congestion would result unless westbound Ala Moana Boulevard were widened and provided with adequate left-turn storage lanes.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 22, 1995

Convention Center Authority
State of Hawaii
1833 Kalakaua Dr. Suite 800
Honolulu, Hi. 96815

RECEIVED
MAR 31 1995

WILSON OKAMOTO & ASSOC. INC.

Dear Mr. Hayashi,

As an owner of a condo in Summer Palace I asked several questions at the Feb. 22, 1995 meeting that I did not think were fully answered.

I was not asking just about damage to our building, but IRREPARABLE damage? Is that still the contractor's responsibility? And how do you recompense anyone for the total loss of their home?

Saying that the city will "probably" require the project to construct sidewalks on "your" side of Kahakai is not exactly reassuring, when your plans clearly show NO sidewalk!

Sincerely,

Muriel Poyner

Mrs. Muriel Poyner
1848 Kahakai Dr. #1801
Honolulu, Hawaii 96814

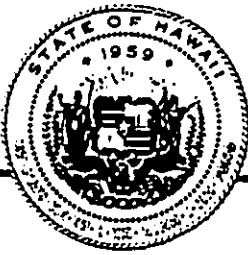
Convention Center Authority
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Other: *copy to Carl Wickert/Mark Hackett/Dan Bree/Thy Sutton/Carl Cordas*

File under: *DEIS COMMENTS*

Other use: *SUMMER PALACE*



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mrs. Muriel Poyner
1848 Kahakai Drive, #1801
Honolulu, Hawaii 96814

Dear Mrs. Poyner:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 22, 1995 commenting on the subject Draft EIS.

Regarding your comments, the question that was recorded at the February 22, 1995 public informational meeting was "Who is responsible if a neighboring building incurs damage resulting from the construction of the convention center?" As indicated at the meeting, the contractor for the project will be responsible for damages to adjacent buildings (i.e., the contractor is insured for such damages to adjacent buildings). Also, the design/builder will be hiring an independent company to establish a monitoring process for adjacent properties. This process will include a pictorial survey of adjacent buildings prior to start of construction, the setting of survey points on the buildings, and the monitoring of possible movement of the buildings on a regular basis throughout the duration of construction of the convention center.

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive, by the Atkinson Plaza condominium, and most residents in the Kahakai Drive area live on the ewa side of the road, it was

Mrs. Muriel Poyner
July 17, 1995
Page 2

assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

ROBERT RODMAN

1886 Kai'o Drive #G

Honolulu, Hawaii 96815-1054

Phone (808) 949-2497

March 17, 1995

Senator Carol Fukunaga
State Office Tower, Rm. #302
235 S. Beretania Street
Honolulu, Hawaii 96813

Re: Your request for my comments regarding the Convention Center Community Network
Technical Evaluation Team's review of the Draft EIS, dated March 9, 1995

Dear Senator Fukunaga:

Thank you for sending me the review of the Draft EIS. After reading the comments I feel that most of my concerns have been addressed by the review, particularly the comments of Dr. C.S. Papacostas, Dr. Panos Prevedouros, Scott Hamilton, and the June 1994 letters to the Planners from Neighborhood Boards No. 8 & 11.

I do find that my concerns about simultaneous conventions / programs / concerts at the Aloha Motors site and at the Hilton Hawaiian Village are not addressed in the Review. (for example: Prom night and a convention)

Presently, when the Hilton has a convention with many attendees arriving at the same time (say early evening for a concert or large program), the back up, gridlock, of cars on all roads leading to their parking structure lasts for hours. This involves cars on Kalakaua Avenue backed up to Makaloa Street; also cars backed up to King Street on McCully Street; also cars backed up on Ala Moana Blvd. past Piikoi Street; also cars backed up to Kalakaua Avenue on both Saratoga Road and Lewers Street (conflicting with traffic going into the parking structure at the Waikiki Sheraton); also cars backed up to Kaiakaua Avenue on Ena Road; also cars backed up to the Ala Wai Blvd. on Hobron Lane to both Ala Moana Blvd. and Ena Road.

Another concern is the issue of the many annual Waikiki parades and block parties which are scheduled frequently on Kalakaua Avenue. These 'happenings' / 'events' completely close traffic from Kalakaua Avenue for hours at a time. These 'events' would also include Halloween, which 'event' can cause an all-evening-long traffic jam which causes THE BUS to take 50 minutes to move from King Street to the International Market Place. During these "street events" traffic from (1) Kalakaua Avenue (2 lanes), (2) Ena Road (1 lane), (3) McCully Street (4 lanes), and (4) Ala Moana Blvd. (2 lanes) = (total of 9 lanes) thru Waikiki is funneled down thru two lanes on Kuhio Avenue.

Senator Carol Fukunaga
P.2 , March 17, 1995
Comments on 'Review' of EIS

Presently, there is very heavy traffic traveling towards Ala Moana Blvd. from Kalakaua Avenue on Ala Wai Blvd. (makai of Kalakaua Avenue), Lipeepee Street, and Hobron Lane (both to Ena Road and to Ala Moana Blvd.): At times the traffic back up on these streets is very severe. This route is a short cut from the Ala Wai / Kalakaua Avenue Bridge to Ala Moana Blvd.. Often the emergency vehicles under present conditions have a hard time getting thru.

The present problem of Ambulances and Fire Trucks getting over the Ala Wai Bridges on (1) Ala Moana Blvd., (2) Kalakaua Avenue, and (3) McCully Street is not addressed in your "Review". Under the conditions described above, at events in Waikiki, the ingress and egress of Emergency Vehicles now is almost impossible. The addition of enough vehicles needed to transport 8,000 to 15,000 people 'to' and 'from' events held at the old Aloha Motors Site to these already periodic gridlock conditions on the Eva end of Waikiki's present street system is truthfully called 'lunacy'.

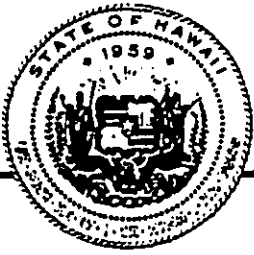
One or two conventions held with traffic gridlock resulting is all it will take to get the word out that Waikiki's Convention Center is not the place to book a serious convention.

If you have any questions about these comments, please feel free to contact me at 949-2497.

Mahalo,



Robert Rodman



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Robert Rodman
1886 Kaio'o Drive #G
Honolulu, Hawaii 96815

Dear Mr. Rodman:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 17, 1995 to Senator Carol Fukunaga commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

We acknowledge your traffic-related concerns with respect to events occurring simultaneously at the convention center and the Hilton Hawaiian Village Hotel. However, it is not anticipated that simultaneous events at these two facilities would significantly impact traffic in the vicinity. This is because the convention center will be utilized primarily by national and international organizations and attendance by local residences will be minimal. Attendees will therefore, be coming out of Waikiki to the center which is contra to the back-ups you identified. Local residents who do need to get to the convention center would not enter Waikiki, as most motorists would turn off at Kapiolani Boulevard (from east Honolulu or the H-1 Freeway) and Atkinson Drive (from Ala Moana and Kapiolani Boulevards), respectively. Therefore, there should be little conflict between traffic travelling to the convention center and the Hilton Hawaiian Village Hotel, except on upper Kalakaua by freeway users from West Honolulu.

Regarding your concern with traffic during Waikiki parades and block parties on Kalakaua Avenue, we emphasize that the EIS TIAR analyzes the traffic and transportation impacts of a range of scenarios which could reasonably occur at the convention center. It is not feasible or possible to address every conceivable situation or scenario at the EIS level of analysis. When the convention center becomes operational, its transportation coordinator would be responsible for preparing transportation management plans, as deemed necessary, for various events. These plans could include contingencies to address unique conditions such as parades and events at nearby

Mr. Robert Rodman
July 17, 1995
Page 2

venues such as Ala Moana Center or Ala Moana Park and will be coordinated with the City and County of Honolulu Department of Transportation Services.

Regarding emergency vehicle access on the roadways, please be apprised that the streets in the area of the convention center have sufficient road width for emergency vehicles to pass traffic pulled over to the curb side. Further, shuttle buses returning to Waikiki from the convention center will be directed to travel via Kalakaua Avenue to Ala Moana Boulevard, and not onto Ala Wai Boulevard makai of Kalakaua Avenue.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

MARCH 13, 1995

RECEIVED
MAR 13 1995

WILSON, OKAMOTO & ASSO.S, INC.
1907 SO. BERETANIA ST.
HONOLULU, HI. 96826

DEAR SIRs:

THANK YOU FOR YOUR LETTER TO MY HUSBAND FRANK P. SILVIA ON MARCH TENTH, 1995, RE: CONVENTION CENTER NEWS.

I WOULD LIKE TO MAKE A SUGGESTION AS TO THE FLOW OF TRAFFIC THAT WE AT ATKINSON PLAZA HAVE A PROBLEM WITH. THE PROBLEM IS THAT WE ONLY HAVE ONE EXIT FROM OUR PARKING GARAGE ON ATKINSON DR. WE HAVE MUCH DIFFICULTY GETTING OUT INTO THE TRAFFIC DAY AND NIGHT, WITH ~~PEAK~~ HOURS ALMOST AN IMPOSSIBILITY.

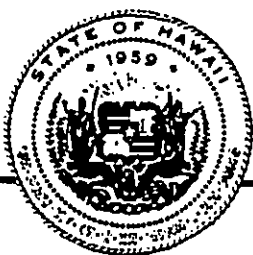
THE SUGGESTION IS TO PUT TWO SETS OF TRAFFIC SIGNALS IN TO WORK AT THE SAME TIME TO ALLOW THE EVEN FLOW FROM KAHAKI DR AND FROM FOLKS TRYING TO GET OUT OF ATKINSON PLAZA DRIVEWAY. THIS COULD BE DONE BY INSTALLING ONE SET AT THE CROSSWALK AREA NOW WHERE IT IS AND ALSO AT THE CORNER WHERE YOU PLAN ON PUTTING THE OTHER ONE. IT WOULD NOT ONLY HELP WHEN THERE WAS A GREAT DEAL OF ACTIVITY IN THE CONVENTION CENTER, BUT WOULD GREATLY HELP EVEN NOW. THANK YOU.

SINCERELY,

Dolores Silvia

DOLORES SILVIA

475 ATKINSON DR. #1106
HONOLULU, HI. 96814



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mrs. Dolores Silvia
475 Atkinson Dr. #1106
Honolulu, Hawaii 96814

Dear Mrs. Silvia:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 13, 1995 commenting on the subject Draft EIS.

In response to your suggestion, please be informed that the traffic volumes entering/exiting the Atkinson Plaza driveway do not warrant a traffic signal according to the *Manual on Uniform Traffic Control Devices for Streets and Highways*, Federal Highway Administration, U.S. Department of Transportation. Also, the existing pedestrian crosswalk on Atkinson Drive near Kona Street will be relocated to the mauka side of this intersection. Please be apprised that the City and County Department of Transportation Services (DTS) is currently reviewing the roadway construction plans for the convention center project. Upon review, DTS will determine the appropriate traffic operational measures which may be required in the vicinity of the Atkinson Plaza driveway.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 24, 1995

Governor, State of Hawaii
c/o Office of Environmental Quality Control
220 South King Street, Suite 400
Honolulu, Hawaii 96813

First of all, I would like to say that I find the Office of Environmental Quality Control (OEQC) bulletin to be well structured and very informative, and am hereby requesting that my name be retained on this office's mailing list.

Secondly, I would like to pass on a few comments that I would like this Office to consider and forward to the Proposing Agency regarding the request of the Convention Center Authority to have Nordic/PCL complete the design and construction of a "world class" convention center at the former Aloha Motors property at 1777 Kapiolani Boulevard.

This convention center facility as proposed would have:

- a. 200,000 square feet of exhibition space;
- b. 100,000 square feet for a meeting room;
- c. 35,000 square feet for a ballroom;
- d. 100,000 square feet of additional exhibition space;
- e. 50,000 square feet for another meeting room;
- f. 800 parking spaces on site.

The two meeting rooms (item b and item e) combined could theoretically accommodate 14,000 to 15,000 convention attendees per day. The two exhibition areas (item a and item d) could possibly accommodate 400-500 exhibition booths and displays with approximately 800-1,000 exhibitors per day. The ballroom (item c) could potentially accommodate 2,500-3,000 people. In addition to these attendees and exhibitors, there are also the business and administrative staff, food and beverage, maintenance and audio-video, security, custodial, and other site support personnel.

My main concern is the relatively small number of parking spaces designated for this project. Instead of only 800 parking spaces on site, I would like to propose that there be approximately 2,400 parking spaces on site.

To attract people to attend events at this "world class" facility, transportation and vehicular accommodations should be convenient, safe, and readily available.

While it may be possible for most attendees from out-of-state who assemble in the two meeting rooms to use chartered buses, there would still most likely be a significant percentage of local attendees who would use their personal cars to attend the meeting room events. If 10% of the maximum meeting room attendees were

local people, the site would attract 1,000 local people. The presence of meeting rooms, exhibition halls, and ballroom could mean that there could be three to five different functions going on at the convention center complex on the same day.

In addition to parking for convention attendees, there should be parking available for exhibitors who typically would need some form of transportation at times when the chartered buses would not be available, there should be parking available for local people attending a function in the ballroom, and also there should be parking for the convention center complex support people.

The existing Neil Blaisdell Center complex has an arena that accommodates approximately 7,200 people, a concert hall that accommodates approximately 2,800 people, and an exhibition area that is almost 200,000 square feet. This complex has approximately 1,600 parking spaces, and when only the arena and the concert hall are both nearly sold out on the same day, these 1,600 parking spaces are not enough to accommodate the people who attend those events in the arena and concert hall.

To designate parking spaces off-site across the street would be a hassle and inconvenient, and require additional traffic flow studies for the off-site parking facilities. Many times, convention attendees are given books, handouts, souvenirs, and other things to be carried around. Having parking spaces off site would also mean that the security staff would have to be much larger to patrol the meeting rooms, exhibition halls, ballrooms, on-site parking, and off-site parking. The State's scope of liability would also be spread to all of these sites.

To limit the on-site parking to only 800 parking spaces would only encourage attendees, exhibitors, and support personnel to park at nearby facilities like the Ala Moana Shopping Center.

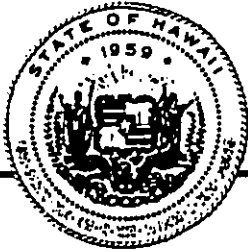
In closing, I would like the completed convention center complex design plan to include approximately 2,400 parking spaces at the 1777 Kapiolani Boulevard site.

Thank you for reading and responding to my comments.

Linda W.L. Starr

Linda W.L. Starr
P.O. Box 240310
Honolulu, HI 96824-0310

✓c: Alan Hayashi
Convention Center Authority



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Linda W.L. Starr
P.O. Box 240310
Honolulu, Hawaii 96824

Dear Ms. Starr:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 24, 1995 commenting on the subject Draft EIS. We offer the following responses to your comments:

First, we would like to clarify that the 100,000 square feet of additional exhibition space and 50,000 square feet of meeting room space as indicated in your letter represent the future expansion space of the convention center facility. The increase would better accommodate the infrequent larger conventions and provide more space to better serve the mid-size conventions. At this time, the time frame for future expansion of the Center remains undetermined.

Regarding your concern about the relatively small number of parking spaces designated for the convention center, please be apprised that the number of on-site parking spaces (800) was established on the basis that the Center's primary market is intended to be off-shore national and international conventions, trade shows, exhibitions, and meetings where most of the delegates would be transported to the site by shuttle buses. The approximately 2,400 on-site parking spaces you propose, in addition to being excessive for the proposed facility, is highly unfeasible given the site constraints and facility requirements for a world-class convention center.

We concur that provision of convenient, safe, and readily available transportation and vehicular accommodations are highly important in attracting conventions to the proposed facility.

Your assumption that there would likely be a significant percentage of local attendees who would use their personal cars to attend events at the convention center concurs with the travel mode split used in the EIS traffic study. The EIS

Ms. Linda W.L. Starr
July 17, 1995
Page 2

traffic study assumes that 90 percent of local residents attending a convention event are expected to use personal automobiles. However, contrary to your assumption of 10 percent local attendees, local residents typically comprise 5 percent or less of attendees at national conventions held in Honolulu. According to the manager of the Hyatt Regency Waikiki, 10 percent local resident attendance at a national convention is a very high percentage.

For most convention events, the 800 on-site parking stalls would likely be allocated for Oahu visitor attendees, local resident attendees, exhibitors, and full-time employees of the convention center. The basis for allocating a particular number of stalls among the attendees, exhibitors and employees would most likely be dependent on the nature of the event. For your information, the EIS traffic study assessed the convention center parking needs based on a 10,000-person national convention using the travel forecast assumptions developed in the study. On the assumption that the estimated peak parking demand would occur during the mid-morning period, the parking requirements for convention center employees, Oahu visitor attendees, and local resident attendees are estimated at 390 stalls. The remaining 410 unused stalls would be available to accommodate any functions when the actual levels of automobile use exceed the study assumptions. These available stalls could be used to accommodate events that have a higher proportion of Oahu resident attendees or a higher proportion of Oahu visitors driving to the site. In general, the assessment demonstrates that the 800 on-site parking stalls appear sufficient to accommodate most national and international events at the convention center, assuming that market rates are charged for parking.

Your observation of the inadequacy of the 1,600 parking spaces at the Blaisdell Center during capacity events at both the arena and concert hall is acknowledged. However, as the Blaisdell Center is a primary venue for local events, it is expected that most attendees would be local residents who typically drive to the event. On the other hand, as previously indicated, the primary market for the convention center is intended to be off-shore national and international conventions, trade shows, exhibitions, and meetings where most of the delegates would be transported to the site by shuttle buses.

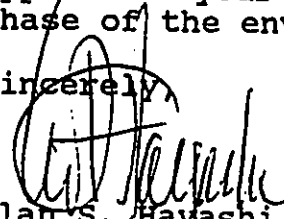
Ms. Linda W.L. Starr
July 17, 1995
Page 3

Currently, the convention center plans do not include designation of support parking areas across the street from the facility.

Regarding your concern that the 800 on-site parking stalls would only encourage convention center goers to park at nearby facilities such as Ala Moana Center, please be apprised that the EIS traffic study identifies a number of parking alternatives which could become part of an overall parking management plan by the transportation coordinator of the convention center operator. It is acknowledged that there may be events that would have a higher proportion of local resident attendees driving to the convention center, or would require additional temporary and part-time employees, or trade show exhibitors who may require special parking needs. The parking alternatives identified would increase the number of available stalls or provide alternatives to parking at the convention center. Some of the alternatives include use of existing outlying parking facilities that may be available during the event; arrangements for additional employee parking with nearby hotels, commercial offices, and residential condominiums; issuance of passes for on-site parking; and, issuance of public bus passes to convention center employees.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

COMMENTS ON HAWAII CONVENTION CENTER DEIS

I have three concerns that were not answered in the DEIS or need to be mitigated before construction.

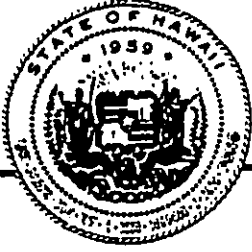
1-- The roof top garden noise level is projected to reach 90+ decibels. This sound level is 27 decibels over the legal limit. This sound seems to rise and is more noticeable to those above street level. A Kuhio Ave. nightclub manager told me he receives noise complaints whenever music volume exceeds the legal limit. Sometimes the music is from street musicians playing on Kalakaua Ave. This music travels up and is heard by condo owners on Kuhio Avenue. The Convention Center 90+ projected decibel level must be addressed now, so mitigation can be worked on before construction is started.

2-- When simultaneous smaller local convention center events begin around 5:00 P.M., all traffic (residential and convention center) will converge at the Kapiclanlani Blvd./Kalakaua Ave. choke point. Mitigation similar to that used by tourists leaving the Waikiki hotels either on a managed bus system or by walking is not an option. A collateral problem requires an ENFORCEABLE plan be designed to keep those convention center users, . . . that cannot or choose not to park in the available 800 CC parking stalls, from using up the scarce surrounding residential street parking which is simultaneously being "fought for" ^{by} residents returning from work.

3-- Surrounding areas "subject to change" will lose housing stock, especially in the Hobron area (described in the EA as the densest residential area in the State of Hawaii). Since Waikiki has already lost substantial housing units during the last five years, any further reduction will severely impact the affordability of housing issue on Oahu, since the displaced residents will now have to compete for the remaining housing stock on the island. This loss of housing supply, with a constant or increasing demand, will drive up rents and become an additional "tax" that must be paid. Since most affordable housing is occupied by low or moderate income persons, this new "tax" is very regressive in nature. This future development of "surrounding areas subject to change" has not addressed all the carrying capacity issues relevant to such development, i.e. infrastructure, sewers, vehicular movement, etc.

Mahalo,

Duke Sturgeon
Duke Sturgeon
444 Namahana street, # 2-C
Honolulu, HI 96815



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Duke Sturgeon
444 Namahana Street, #2-C
Honolulu, Hawaii 96815

Dear Mr. Sturgeon:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. The noise study prepared for the Draft EIS does not indicate that the noise level of the roof terrace assembly area is projected to reach 90+ decibels (dB). Rather, the study indicates that amplified music or voice levels of 80 to 90 dB will be required in order to insure the intelligibility of music vocal performances or voice announcements over the entire assembly area. However, the study also indicates that these noise levels could generate adverse impacts at the neighboring properties, and probably exceed the State Department of Health (DOH) daytime limit of 60 Db. For these reasons, the study indicates that use of the roof terrace area for large assemblies is not recommended unless special noise mitigation measures are employed, such as the use of portable enclosures to house large assemblies and/or small groups when amplified sound systems are required. The design of these enclosures should allow for a minimum of 30 dB of noise reduction or to limit noise emissions to levels below the applicable State DOH noise limits.
2. It is not anticipated that simultaneous smaller local events will be held at the convention center since the Center's primary market is intended to be off-shore national and international conventions, trade shows, exhibitions, and meetings. The convention center is not intended to be a primary venue for local events, nor to compete with the Blaisdell Center or hotels that host smaller conventions in their ballroom facilities. It should be noted that on-going improvements to the Blaisdell Center were funded in the amount of \$13 million

Mr. Duke Sturgeon
July 17, 1995
Page 2

by the State specifically to better accommodate local tradeshows and other large events. The convention center could, however, supplement the existing local venues.

Further, since convention events tend to run from the morning to the late afternoon, separate events beginning at 5:00 PM would most likely be precluded at the convention center. During this time, the facilities would likely be occupied with the take-down or set-up activities for the major national/international conventions.

3. We assume that your concern is not the overall decrease in the overall housing stock but, rather, a possible reduction in affordable housing units. It is noted that the housing supply would likely increase as landowners or developers opt to increase residential density to achieve economic viability and profit.

We further assume that you are referring to the elimination of the existing low-rise apartments, which are likely candidates for redevelopment, and presumably in low rent areas. This would not include existing high-rise condominiums, such as 1717 Ala Wai and the Marina Towers condominium.

Within this context, the Social Impact Assessment in the Draft EIS provides a thorough assessment of potential secondary impacts of the convention center on areas identified susceptible to redevelopment in the vicinity. It clearly states, however, that this impact on the neighborhood may vary, depending on the nature of existing uses and whether other landowners will want to redevelop their parcels. Hence, while the assessment identified parcels susceptible to change, it also noted that the convention center is not the sole cause of change of to the neighborhood, and the surrounding area will likely change even if the facility were not built.

The proposed convention center is inherently visitor-oriented, however, and this quality introduces another level of possible change to this residential neighborhood. While the convention center may not be the cause of change, it may serve as a catalyst for the redevelopment of neighboring parcels. A stand-alone convention center on a site located outside of the major

Mr. Duke Sturgeon
July 17, 1995
Page 3

resort district may create opportunities for redevelopment and financial gain. This is particularly so for parcels on which older buildings, earning negligible profit, can be replaced by higher yield uses. Thus, it is likely that redevelopment will eliminate many affordable units, but to what extent is unclear.

Based on comments received on the Draft EIS, the SIA was revised to include an expanded discussion of primary, secondary and cumulative impacts as well as the identification of mitigation measures for consideration. Mitigation measures offered for consideration include public policies to control redevelopment, control rents, control property values and provide assistance to displaced persons. It should be emphasized, however, that while the development of the convention center may have the cumulative impact of speeding-up redevelopment in the neighborhood, it is unlikely to be the only impetus. Hence, the responsibility of the State in implementing such measures is unresolved at this time and will be so noted in the Final EIS. The Social Impact Assessment (SIA) clearly states that the development of the convention center could result in redevelopment of existing residential areas.

Finally, regarding "carry capacity" of infrastructure, the Draft EIS characterizes the existing conditions of these systems, projects convention center impacts, and recommends mitigation. To determine the carrying capacity in the long-term future would require assumptions about several variables which are dependent on the discretion and ability of the respective developers of the adjacent developable lands. These variables include desired density, financing, the overall economic climate at the time of redevelopment, and the ability of the developer to secure necessary land use approvals and permits. Impacts arising from redevelopment efforts which are yet to be identified are tertiary at best, and it is difficult to project such impacts at a reasonable level.

Mr. Duke Sturgeon
July 17, 1995
Page 4

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

POSTED
3/25/95

RECEIVED

'95 MAR 28 AM 11:47

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

Gary Gill, Director
State of Hawaii
Off. Environmental Quality Control
220 So. King St., 4th Floor
Honolulu, Hawaii 96813.

March 23, 1995

Dear Mr. Gill

I am a resident of the Kahakai Drive residential community. I would like to know how the traffic ingress and egress problems will be resolved with respect to the convention center project. How will the access to our property be guaranteed to remain clear at all times both for us and for fire trucks and rescue paramedics.

I object to the sidewalks being removed from Kahakai Drive along the convention center. We must use that sidewalk on a daily basis.

I object to the noise and fumes that will accompany the truck road that is planned for the convention center property.

How will construction vehicles be managed while entering and exiting the site in the morning and evening?

How will the convention center parking deck be shielded from the pool and recreation deck of our building?

How will the Convention Center Authority solve these problems?

What will the operating hours of the convention center be?

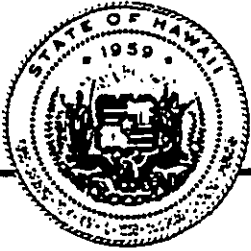
I await your written reply.

Yours truly,

Kay Tanaka

KAY TANAKA
1848 Kahakai Dr
APT 703

Honolulu, Hawaii
96814



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Kay Tanaka
1848 Kahakai Drive, #703
Honolulu, Hawaii 96814

Dear Ms. Tanaka:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 23, 1995 to Mr. Gary Gill, Director of the State of Hawaii Office of Environmental Quality Control, commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

The traffic study prepared for the convention center EIS addresses the potential traffic impacts resulting from the convention center and identifies specific mitigation measures to reduce or minimize these impacts.

Regarding your inquiry about how access to The Summer Palace condominium will be guaranteed to remain clear at all times for both condominium residents and emergency vehicles, please be apprised that the proposed design of Kahakai Drive is intended to facilitate vehicular ingress/egress for motorists travelling to the convention center, as well as the adjacent residential areas. The segment of Kahakai Drive adjacent to the convention center will be widened by an additional two traffic lanes to provide a total of four lanes (two inbound and two outbound lanes) and a 10-foot wide landscaped median. The two inbound lanes will separate convention center traffic from the residential traffic on Kahakai Drive. The left inbound lane will provide access to the convention center's parking garage and truck dock access, and the right inbound lane will provide access to the residential area of Kahakai Drive. The two outbound lanes will provide separate left- and right-turn lanes onto Atkinson Drive.

Also, a traffic signal will be installed at the intersection of Atkinson Drive and Kahakai Drive as part of the convention center project to facilitate vehicular movement into and out of Kahakai Drive. An exclusive left-turn lane into Kahakai Drive from Atkinson Drive will be provided for Kahakai residents and convention center traffic.

Ms. Kay Tanaka
July 17, 1995
Page 2

A continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock and the outbound parking ramp. Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive, by the Atkinson Plaza condominium, and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

We presume that your reference to "the truck road that is planned for the convention center property" addresses the on-site truck access located along Kahakai Drive between the Center's entry parking ramp and the corner of the truck dock nearest The Summer Palace condominium. Due to concerns about noise generated in the loading dock and from trucks on the on-site driveway leading to the loading dock, the CCA and the design/builder are considering enclosing the driveway between the Center's entry parking ramp and the corner of the loading dock nearest The Summer Palace condominium. The enclosure would attenuate noise at The Summer Palace condominium boundary. The driveway enclosure, however, would be considered a structure encroaching within the building setback area adjacent to The Summer Palace condominium boundary. The decision to enclose the driveway will be made in consultation

Ms. Kay Tanaka
July 17, 1995
Page 3

with the residents of The Summer Palace condominium. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

To avoid potential traffic congestion, movement of construction vehicles to and from the project site will be restricted during the morning and afternoon peak traffic periods. Flagmen or off-duty police officers will be employed to direct traffic during significant phases of construction to minimize traffic congestion.

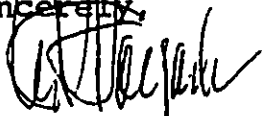
As part of the convention center design, a solid wall will be built along a portion of the Kahakai Drive side of the second level parking garage between the entrance ramp and the corner adjacent to The Summer Palace condominium. The wall is intended to shield noise from the parking garage (such as door slamming, etc.) which may be audible at nearby dwelling units along Kahakai Drive. The wall will also serve as a visual shield between the convention center's parking garage and the pool and recreation deck of The Summer Palace condominium.

Our previous responses indicate how the Convention Center Authority will solve the concerns you identified.

Convention centers typically do not have set hours of operation. Aside from the administration hours, operating hours would primarily be dependent on the number and types of events or functions held at the convention center.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

CONVENTION CENTER AUTHORITY
841 BISHOP STREET
ROOM 222
HONOLULU, HI 96813

FEBRUARY 22, 1995

Dear Sirs;

In respect to the environmental impact statement that was published in the Honolulu Advertiser, I have the following objections:

1. Noise levels around the proposed convention center area will be increased to an unacceptable level. I protest.
2. Pollution may exceed State standards. I protest.
3. Traffic will increase significantly. I protest.

The convention center authority has not developed a plan to properly address these environmental problems.

LARRY TRUESDELL
APT. 2804
1925 KALAKAUA AVE.
HONOLULU, HI 96815

Convention Center Authority
Received

Number 438 Date 2/28/95
Name ASCH Route SB
ASCH
SB
JYS
EU
LT
PI
Color: Copy to Mark Hirtel / Carl Waterhouse
File under: DES COMMENTS - C
Other issues: OBJECTIONS TO NOISE/POLLUTION/TRAFFIC



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Larry Truesdell
1925 Kalakaua Avenue, Apt. 2804
Honolulu, Hawaii 96815

Dear Mr. Truesdell:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter of February 22, 1995 commenting on the subject Draft EIS.

We acknowledge your stated objections to noise levels, pollution, and traffic increases with respect to the convention center. Also, we would like to clarify that the EIS for the convention center was not published in the Honolulu Advertiser. We presume that your comments were based on the convention center article which appeared in the February 20, 1995 edition of the Honolulu Advertiser. Contrary to your comment, the EIS prepared for the Convention Center Authority does address the noise, pollution, and traffic problems you identified. Specifically, separate noise, air quality, and traffic studies were conducted for the EIS which address the respective potential impacts resulting from the convention center and identify specific mitigation measures to reduce or minimize these impacts.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,


Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

MAR 16 1995

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MAR 24 1995

WILSON OKAMOTO & ASSO. INC

Convention Center Authority
841 Bishop Street - Room 2222
Honolulu HI 96813

It is impossible to judge the success
of the planned Convention Center
in the thousands of taxpayers
citizens who reside within a 10 square
mile area of its site — a square
the studies for which the State and
city have spent thousands of
dollars, if the Convention Center
will be just one more business
district in the current city
that this community has allowed
to take the place of Hahaione.

People who call the site area
home have been forgotten, ignored
and oppressed for the sake of



Allan Wallace 199-03-4755
425 Ena Road, Apt. 101B
Honolulu, HI 96815-1706
(808) 945-0137

Executive can solve the problem with
in short order. It is a challenge
to all concerned, equal to
exceeding the "white elephant"
status of Aloha Stadium.

There is no reason the current
logistical facilities in Hawaii
can not handle conversions of
almost any size. In a few
years ago an Ellis Convention
of over 40,000 happily endured
their days of meetings and
pools without disrupting
either their schedules or the
daily vacations of thousands of
tourists.

I trust someone some day will
revisit the Honolulu Advertiser
article in Section 4-B published
Monday Feb. 20, 1995 which
headlined an Environmental Study

estimate that the new center
would only add 1 minute to
traffic delays at the corner of
Kalakaua & Kapitolian.

What about the people who live
in the vicinity and on a daily
basis if conventions are to be so
plentiful, time to fight the
traffic to get to and from their
homes!?

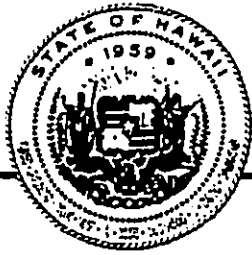
What about parking? Guess
it's a wild guess that in
spite of the expensive studies,
problems will arise to the
discomfort of many.

And the costs - whether bonds or
city cash, with the economic &
money much already strangling
the city, taxpayers will somehow
be responsible for partial or

Constitutional contributions to the
national total cost. May, with
all of these negatives to the
politicians of you, the Constitution
authority, think that will be a
"massive" - better attention to
current housing, traffic, homeless,
debt, drug, empty stores, rural
business destruction, environmental, crime
taxes, unemployment, education, etc.
problems would be more in the
interests of all the citizens?

Hawaii if men, women and money
available would be spent in
their direction - without
creating another "state deficit" -
but what will be small voice mean
against the economy? How little.
However you asked for good for thought.
How too - a complete digestion would
cost "gas pains" later on.

William Wallace



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Allan Wallace
425 Ena Road, Apt. 101B
Honolulu, Hawaii 96815

Dear Mr. Wallace:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter of March 16, 1995 commenting on the subject Draft EIS.

First, we would like to inform you that the copy of your letter which we received was very faint and unreadable in certain areas. As such, our responses are based on what we were able to decipher.

Your stated opinion disputing the need for a convention center is acknowledged. Regarding your comment that there is no reason that current facilities in Hawaii cannot handle conventions of any size, we would like to point out that convention organizers around the country have bypassed Hawaii for other destinations due to lack of an adequate convention facility. In comparison with the Elks convention that you mentioned was held in Hawaii years ago, we cite the example of the American Dental Association (ADA) convention in Waikiki a few years ago with an equally large contingent. Due to the lack of an adequate convention facility, the ADA sessions were held in every available meeting/convention facility located within various Waikiki hotels, resulting in less than efficient conditions. Although the ADA also admittedly enjoyed their Waikiki stay, they subsequently made a decision to not return to Hawaii until an adequate convention facility is built. The loss of such convention-related business has long-lasting and far-reaching impacts on the State's economy.

We acknowledge your stated opinions concerning traffic and parking. The traffic study prepared for the convention center EIS addresses the potential traffic and parking impacts resulting from the convention center and identifies specific mitigation measures to reduce or minimize these impacts. Regarding your comments, we would like to provide clarification to the referenced Honolulu Advertiser's article

Mr. Allan Wallace
July 17, 1995
Page 2

headline (February 20, 1995) that the convention center would add only one minute to traffic delays at the intersection of Kalakaua Avenue and Kapiolani Boulevard. If the convention center were not built, the average delay at the Kapiolani/Kalakaua intersection would be 53.9 seconds per vehicle. During a 14,000-person event at the convention center, the intersection delay would increase to 62.9 seconds per vehicle under existing roadway conditions. The traffic improvements proposed in the EIS traffic study would reduce the average delay to 54.1 seconds per vehicle. If we extend the comparison further, the delay on "dark days" (convention set-up and take-down times with no events) would be 44.7 seconds per vehicle, which is considerably better than if the convention center were not built.

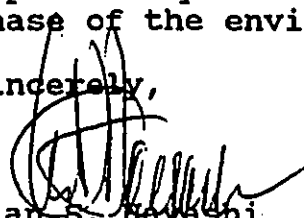
We would also like to clarify the point you made that taxpayers will somehow be responsible for partial or substantial contributions to the eventual total cost of the convention center. In a special session in 1993, the Legislature, in H.B. No. S7-93, provided a mechanism for selecting a site and financing the development of a convention center facility. The bill also established a capital and operations special fund for the convention center, and approved raising the transient accommodations tax (hotel room tax paid by visitors) from five percent to six percent in order to raise the \$350 million to buy the Aloha Motors site and construct a world-class convention center. The issuance of general obligation and revenue bonds was also allowed.

Your opinion which implies that money spent be directed to problem issues such as traffic, homeless, unemployment, education, etc. instead is acknowledged.

Mr. Allan Wallace
July 17, 1995
Page 3

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

NOISE 3-14-95

1. Except for the totally deaf, NOISE is THE salient feature of Waikiki. (Our relatives came to 1717 Ala Wai for two weeks in 1988, but left after three days--angry--because of the noise.) One can avoid seeing or thinking about the concrete, steel, and glass, but one can NOT shut out the noise--even with "sound-proofing" and air conditioners. Incidentally wood louvers (as at 1717 Ala Wai) warp and can NOT be shut tightly. Moreover no above-street-level unit facing the convention center site can be shielded from noise, as by other buildings. See Ebisu, p. 32, paragraph 4, and p. 36, paragraph 3, seeming to place PRIMARY RESPONSIBILITY on property owners.
2. The Ebisu study indicates possible DECREASES (p. 30) of noise at street level, but little attention is given apartment units above street level--where my mother lives (1717).
3. The study also tends to equate "normal," "typical," or "average" noise with "ACCEPTABLE" noise."
4. Street noise rises and is reflected into living units by the undersides of lanai, focusing and amplifying the noise. Compare the noise level of sirens at street level with the noise level in a unit 250 feet above the source. Even street level shouting is clearly audible high above. If sirens are not facing on vehicles, this further aggravates the problem. (Sirens ought to face forward.) Concerned noise monitors ought to spend some time at 1717 in the higher units, sampling the noise-quality of life--independent of monitoring instruments.
5. We already have totally UNacceptable noise from (in order of irritation level) (A) SIRENS (day and night, REGARDLESS of absence of other traffic), (B) all horns, (C) unmuffled vehicles (including mopeds and motorcycles--some deliberately loud), (D) back-up alarms, (E) boom-boxes in cars or otherwise, and (G) shouting or partying on the street. All of these are abrupt, unexpected, intrusions ABOVE the already-present ambient noise of traffic and motors.
6. ALL use of HORNS and BACK-UP ALARMS ought to be ABSOLUTELY BANNED. Sirens should be strictly PROHIBITED (as they are in other cities) except in extreme cases of daytime traffic blockage. Enforce bans on ALL loud vehicles, boom boxes, and other UNNECESSARY--ESPECIALLY ABRUPT--noise. Muffle pile drivers.
7. It seems likely that the convention center will exacerbate already-intolerable noise levels.

Richard Weimer
2452 Tusitala, #2010
Honolulu 96815
922-3454



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Richard Weimer
2452 Tusitala, #2010
Honolulu, Hawaii 96815

Dear Mr. Weimer:

Subject: Hawaii'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter of March 14, 1995 commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

1. Mitigation of existing or off-site traffic noise impacts are typically performed by individual property owners or by public agencies during roadway improvement projects. With adequate design and closure of windows and doors, high traffic noise levels can be reduced to acceptable levels. Wooden jalousie windows tend to have low sound attenuation values due to their light weight and sound leakage via see-through cracks.

We do not agree that the mitigation measures recommended in the noise study (page 32, paragraph 4, and page 36, paragraph 3) seem to place primary responsibility on property owners. The mitigation identified also include a number of measures which may be implemented by the project contractor during construction and the respective operators of the shuttle buses and trucks during operation of the facility.

2. As indicated in Table 6, page 30 of the noise study, a 2 Ldn decrease in traffic noise was also predicted at the 100 and 250 foot elevations of 1717 Ala Wai (mauka side).
3. In the noise study, we are unable to find reference made to the equation of "normal", "typical", or "average" noise with acceptable noise.
4. Traffic noise associated with the convention center project should follow the same laws of physics (i.e., noise reflecting off of walls, rising in the air) as non-project or existing traffic. Therefore, the degree of

Mr. Richard Weimer
July 17, 1995
Page 2

increase or decrease in future traffic noise levels at a high- or low-rise receptor should be predictable from the changes in traffic volumes, speeds, and mixes, plus any noise shielding and reflection effects. Contrary to your suggestion, sampling of noise without the use of sound level meters (monitoring instruments) is not recommended due to the variations and difficulties in quantifying subjective judgment of noise levels.

5. We concur that existing background noise levels are unacceptable by Federal standards in certain locations in the vicinity of the convention center project area.
6. Due to obvious safety reasons, we do not concur with your suggestion that audible safety devices such as horns and back-up alarms should be banned. Also, your suggestions on enforcing bans on audible safety devices (i.e. sirens) and loud vehicles and other unnecessary, abrupt noise would be more appropriately addressed through your local legislative or City Council representative. For your information, there is an existing City ordinance which enforces bans on boom boxes in vehicles.

The means of muffling pile drivers are described on pages 36 and 37 of the noise study. As indicated in the noise study, noise impacts during the construction period are unavoidable, but temporary. Likewise, it is indicated that noise levels, especially from pile driving activities, may be degraded to unacceptable levels during construction. Construction operations will adhere to the State Department of Health (DOH) noise standards which imposes construction curfew times. For example, the construction curfew restricts pile driving activities (i.e., greater than 95 decibels) to the period between 9:00 AM and 5:30 PM, except Saturdays, Sundays, and specified holidays. Within the project site, pre-drilling through the upper coral layer will be provided for piles to be set in the lower coral layer. This will reduce noise by reducing the number of blows which would otherwise be required to penetrate the upper coral layer. Construction barriers up to 16 feet high will also be erected along the Kahakai Drive project frontage to further reduce construction noise at residences.

7. We do not concur with your comment that the convention center will likely exacerbate already intolerable noise

Mr. Richard Weimer
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levels. According to the noise study (Table 5, page 27), minimal increases in traffic noise of 0.1 to 0.4 Ldn are predicted to occur along the sections of Kapiolani Boulevard, Atkinson Drive, and Kalakaua Avenue bordering the project site as a result of the convention center project. Smaller increases in traffic noise are expected to result from the project along Ala Wai Boulevard, the sections of Kapiolani Boulevard east and west of the project site, and the section of Kalakaua Avenue north of the project site. The largest increase in local traffic noise of 1.9 Ldn is expected to occur along Kahakai Drive, primarily due to the relatively low volume of existing traffic on this roadway. However, the noise levels associated with this roadway are expected to remain less than 65 Ldn. In addition, a net decrease in traffic noise levels at low and mid-rise receptor locations along Kahakai Drive is expected due to the future benefit of noise shielding from the project building, which will reduce the noise contributions from traffic on Kapiolani Boulevard and Kalakaua Avenue. This shielding could also reduce noise levels at 1717 Ala Wai.

Because of the large number of buses expected in the AM peak hour during a major convention event, reduction of bus-related noise is important for minimizing noise impacts on surrounding noise-sensitive neighbors. Discussions with major local bus operators indicate that they are upgrading their fleet in anticipation of convention center business. Modernization of the island's bus fleet will help to reduce noise impacts. The shuttle bus passenger loading/unloading area in front of the convention center has been designed to allow buses to operate without backing up and setting off their back-up alarms. The CCA will recommend that the future convention center operator work with bus companies to formulate bus operation procedures within the Center. Such procedures may include minimizing high speed idling, using lower engine RPM during acceleration, and avoiding maneuvers requiring backing up.

Heavy delivery trucks travelling along Kahakai Drive and Atkinson Drive should comply with State DOH vehicular noise limits and curfew periods. The CCA will also recommend that the future convention center operator establish operating procedures for heavy trucks within

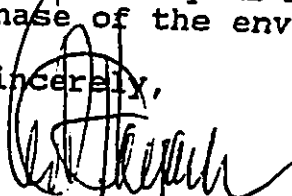
Mr. Richard Weimer
July 17, 1995
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the Center. Such procedures will be similar to those described for shuttle buses above.

The convention center's mechanical equipment will use sound treatment and appropriately insulated housing to comply with the DOH noise limits and minimize risks of noise impacts on neighboring properties. Within the parking garage, non-slick roadway surfaces and acoustic fire-proofing of the ceiling and structural members will attenuate parking garage noise levels.

Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.

March 20, 1995

Convention Center Authority
The State of Hawaii
1833 Kalakaua Suite 800
Honolulu, Hi. 96815

Dear Mr. Hayashi

Summer Palace was built over seventeen years ago. I have lived here since it was first built. Therefore I consider this my home. For seven or eight years now, I have attended many meetings regarding the proposed Convention Center at the old Aloha Motors site.

No doubt, you have received numerous letters from surrounding areas about the concerns with the future building of the Convention Center.

In Summer Palace, our feelings run very strong on this subject.

(IF), this goes through, many lives will be disrupted here and will effect the quality of life.

Just attempting to enter Kahakai Dr. from Atkinson Dr., is frustrating with traffic jams and periodic automobile accidents, etc. And now.....we have to look forward to experiencing an increase in Traffic, Noise impacts, eliminating our walk ways on our street and availability for parking will be lost.

Perhaps, (IF), this is approved, it will be made possible to allow Summer Palace tenants with a name tag, (I.D.), to enable them to park on a specific location allotted them during construction to relieve us of these concerns.

Many problems will arise, I'm sure, but just felt the desire to express some of my personal opinions to ad to the list of letters I assume you'll receive as time goes by.

Aloha Nui Loa for reading my letter. I feel so much better now.

Sincerely,

Lori E. Whiteway
1848 Kahakai Dr. #1604
Honolulu, Hi. 96814

cc: Governor Cayetano

Ms. 



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Ms. Lori E. Whiteway
1848 Kahakai Drive, #1604
Honolulu, Hawaii 96814

Dear Ms. Whiteway:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter of March 20, 1995 commenting on the subject Draft EIS.

We acknowledge your comment indicating that the feelings of those in the Summer Palace run very strong on the subject of the convention center.

We further acknowledge your stated opinion that if the convention center project goes through, many lives will be disrupted and will affect the quality of life.

We recognize the concerns expressed by adjacent residents with respect to traffic and noise impacts resulting from the convention center. The traffic and noise studies prepared for the convention center EIS address the respective potential impacts and identify specific mitigation measures to reduce or minimize these impacts. For example, regarding your concern on entering Kahakai Drive from Atkinson Drive, the convention center project will provide an exclusive left-turn lane on makaibound Atkinson Drive at Kahakai Drive. To further facilitate traffic at this intersection, a traffic signal will be installed at the intersection, which would also include signaling the left-turn movement from maukabound Atkinson Drive to Kona Street.

Also, a continuous sidewalk from The Summer Palace condominium to Atkinson Drive on the convention center side of Kahakai Drive was not included in the design presented in the Draft EIS. Instead, landscaping was proposed on the Kahakai Drive face of the two circular parking ramp structures to "soften" their appearance. There were safety concerns as well, since pedestrians on the convention center side of Kahakai Drive would have to cross the accessways to the inbound parking ramp, the truck dock, and the outbound parking ramp.

Ms. Lori E. Whiteway
July 17, 1995
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Moreover, the only pedestrians that would gain a shorter route would be those walking between The Summer Palace condominium and the Kapiolani Boulevard side of Atkinson Drive, in front of the convention center. Since the new crosswalk across Atkinson Drive will be located on the ewa corner of Kahakai Drive by the Atkinson Plaza condominium (not in front of the convention center lobby as you indicate), and most residents in the Kahakai Drive area live on the ewa side of the road, it was assumed that the sidewalk on the ewa side of Kahakai Drive would be the primary pedestrian route. There will also be a signalized crosswalk across Kahakai Drive at its intersection with Atkinson Drive for pedestrians heading toward Kapiolani Boulevard.

In response to comments by some residents in the Kahakai Drive area, particularly those in The Summer Palace condominium, the design/build team has prepared an alternate design that would replace the landscaping in front of the circular parking ramp structures with a sidewalk. The decision on which plan will be implemented will be made by the City Department of Transportation Services. Therefore, this issue is unresolved at this time and will be identified as such in the Final EIS.

Further, although five (5) on-street parking spaces on the ewa side of Atkinson Drive between Kapiolani Boulevard and Kona Street will be eliminated, this removal was required in order to provide for the roadway improvements necessary to facilitate traffic flow in association with the convention center.

In response to your concern about parking during construction, please be informed that under union rules, the contractor will be obligated to provide off-site parking for construction employees during the duration of the construction. An option may include a reserved location near the project site. This should alleviate the competition for on-street parking in the vicinity of the project site during the construction period.

Ms. Lori E. Whiteway
July 17, 1995
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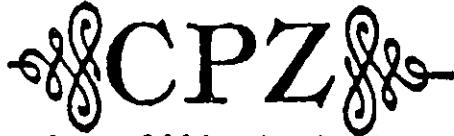
Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



Discovery Bay, Apt. 2901, 1778 Ala Moana Boulevard
Honolulu, Hawaii 96815. Tel: (808) 949-6331 (Res.)

17 March 1995

To: Senator Carol Fukunaga
From: Christ P. Zivalich, Jr
Re: Comments on Hawaii Convention Center Draft EIS

I am concerned about the Flood Insurance Coverage for the Convention Center. When the Flood Insurance Coverage for Our Condominium was increased ten fold so that we had to insure for 80% of the valuation of the building we sent a letter to Congressional Delegation requesting to see if a waiver of that rule could be established for Hawaii.

Senator Daniel Inouye's letter to us was not encouraging. Second Paragraph " This requirement was not part of the National Flood Insurance Reform Act of 1994, which was enacted into law under the Reigle Community Development and Regulatory Improvement Act of 1994 (Public Law 103-325). Rather, the requirement was done administratively by the Federal Insurance Administration (FIA). The change in policy coverage was prompted by FIA's review of policy and strong belief that all condominiums in flood-prone zones are grossly underinsured. Many condominium owners have stated that, in the worst case scenario, flood waters would only reach the third or fourth floors. The FIA believes that flood waters can cause damage to the foundation, thus affecting the structure of the building."

Since the Convention Center is in a Flood-Prone area that a guarantee should be given by the approval agencies, the developers, the planners and architects, the construction companies, and the financial institutions that the Convention Center's foundation will withstand flooding and that the foundation will not be damaged.

I have attended a number of conventions during the past 30 years and there has been one consistent aspect for all of them and that is the conventions run from about 9:00 a.m. to 4:00 p.m.. They never run past 6:00 p.m. except for the Political Conventions.

I have been involved with the Hawaii Career and College Fair which we have presented in Hawaii for the past 20 years. 1995 will be our 21st fair at the Neal blaisdell Center in november. Our hours are from 9:00 am to 4:00 pm. Exhibitors do not want to have the fair operate in the evening.

Pedestrian crossing at the intersections leading into the convention center should be designed in a manner that will expedite movement. Intersections such as Ala Moana/Hobron confuse pedestrians because it is a "U" shaped crossing.

There are questions about emergency vehicles being able to provide service to adjacent condominiums due to convention traffic and blocking of road lanes.

There is the question of noise abatement and air quality control and view plane blockage of adjacent condominiums.

Sincerely,



Encl: Senator Inouye's Ltr
2 pages

DANIEL K. INOUE
HAWAII

PRINCE KUHIO FEDERAL BUILDING
SUITE 7325, 300 ALA MOANA BOULEVARD
HONOLULU, HAWAII 96850
(808) 541-2542

United States Senate

ROOM 722, HART SENATE OFFICE BUILDING
WASHINGTON D. C.
(202) 224-3934

February 16, 1995

Mr. Christ P. Zivalich
Board Secretary
Discovery Bay
1778 Ala Moana Boulevard
Honolulu, Hawaii 96815

Dear Mr. Zivalich:

Thank you for your communication in opposition to the requirement that all condominiums in flood-prone zones have policies covering at least 80 percent of the replacement value of their building.

This requirement was not part of the National Flood Insurance Reform Act of 1994, which was enacted into law under the Riegle Community Development and Regulatory Improvement Act of 1994 (Public Law 103-325). Rather, the requirement was done administratively by the Federal Insurance Administration (FIA). The change in policy coverage was prompted by FIA's review of policy and strong belief that all condominiums in flood-prone zones are grossly underinsured. Many condominium owners have stated that, in the worst case scenario, flood waters would only reach the third or fourth floors. The FIA believes that flood waters can cause damage to the foundation, thus affecting the structure of the building.

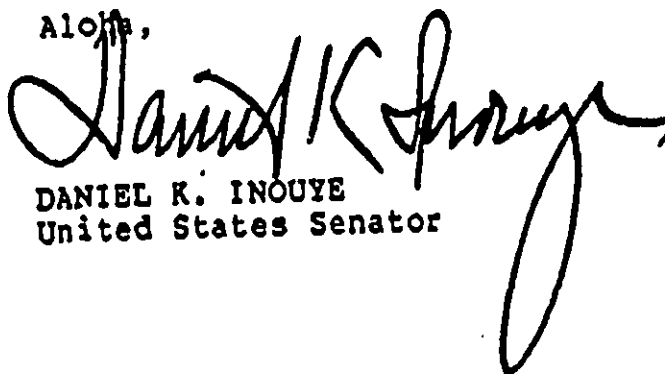
According to the FIA, the new requirement is not mandatory. However, if the condominium association wants a new master policy, it must cover at least 80 percent of the replacement value of the building. Also, if the condominium association chooses to underinsure, the cost of repairs in the event of a disaster will be borne by the association. The Board of Directors may also subject themselves to potential liability.

I regret that the new policy requirement places an added burden on Hawaii's condominium owners. However, it is highly unlikely that the Congress will consider any legislative relief. Such action would appear to go against the principles of the newly enacted reforms to improve insurance compliance and participation in the National Flood Insurance Program. For your perusal, I have enclosed a copy of the relevant pages of the National Flood Insurance Reform Act of 1994. I have also taken the liberty of sharing your comments with the FIA and will share any response I receive with you.

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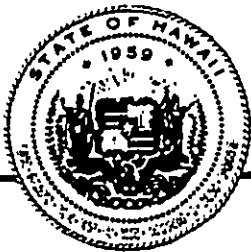
Thank you for sharing your views with me. I trust the information provided will be of assistance to you.

Aloha,



DANIEL R. INOUE
United States Senator

DKI/mcb
Enclosure



Convention Center Authority

1833 KALAKAUA AVENUE, SUITE 800 HONOLULU, HAWAII 96815
TELEPHONE: (808) 973-9790 FAX: (808) 973-9794

July 17, 1995

Mr. Christ P. Zivalich, Jr.
1778 Ala Moana Boulevard, Apt. 2901
Honolulu, Hawaii 96815

Dear Mr. Zivalich:

Subject: Hawai'i Convention Center
Draft Environmental Impact Statement (EIS)
Honolulu, Oahu, Hawaii
Tax Map Key: 2-3-35: 01

This is in response to your letter dated March 17, 1995 to Senator Carol Fukunaga commenting on the subject Draft EIS. We offer the following responses in the respective order of your comments:

The flood hazard affecting the convention center site is identified on the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM) as "Zone A", indicating special flood hazard areas inundated by the 100-year flood, with no base flood elevations determined. Based on its review of a flood elevation study conducted for the site, the City and County of Honolulu Department of Land Utilization (DLU) has since determined that the flood elevation is seven feet above mean sea level (msl). Since the existing elevation of the site is about five feet above msl, the lowest occupied floor of the convention center (the exhibition hall) will be raised two feet to stand at seven feet above msl, in accordance with the flood height determination by the City DLU.

Your comments regarding the hours of conventions are acknowledged.

In conjunction with the development of the convention center, traffic/pedestrian crossing signals will be provided at the intersection of Atkinson Drive and Kahakai Drive/Kona Street. The pedestrian signals will facilitate pedestrian movements between the convention center and the Ala Moana Hotel and Ala Moana Center. Specifically, the existing pedestrian crossing on Atkinson Drive near Kona Street will be relocated to the mauka side of this intersection to coincide with the proposed traffic/pedestrian signals. A crosswalk will also be provided across Kahakai Drive at the intersection with Atkinson Drive as part of the traffic signalization system.

Mr. Christ P. Zivalich, Jr.
July 17, 1995
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Regarding your concern about emergency vehicles being able to provide service to adjacent condominiums due to convention center traffic and blocking of road lanes, please be apprised that among the most important project mitigation measure is the provision of an additional lane of traffic along Kalakaua Avenue and Kapiolani Boulevard, an additional lane along Atkinson Drive, and two (2) additional traffic lanes along Kahakai Drive to accommodate convention center traffic. All of these road widenings will be on the convention center property and, in combination, are anticipated to offset the impacts of traffic created by the convention center during peak traffic hours. Further, as required, the convention center's transportation management plan could include the stationing of traffic control personnel at key access points to facilitate the movement of traffic and emergency vehicles during convention center events.

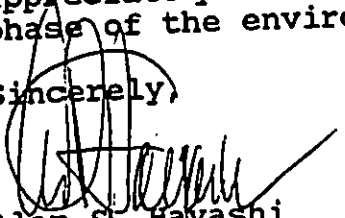
We acknowledge your concerns regarding noise abatement and air quality control with respect to the convention center. The noise and air quality studies prepared for the convention center EIS address the respective potential impacts and identify specific mitigation measures to reduce or minimize these impacts.

Regarding your concern on view plane blockage of adjacent condominiums, a visual impact analysis was conducted for the Draft EIS to depict the impacts of the proposed convention center on public views in the vicinity of the project site. The visual impact analysis includes "before and after" photo-montage comparisons of seven view planes using the model of the convention center design. The analysis shows that while the convention center structure will be clearly visible from the surrounding area, for the most part it will not block any significant public views. Views of the convention center project site from surrounding high rise structures have been mitigated by incorporating expansive site landscaping features, including the 2.5 acres of rooftop garden and 3.5 acres of site, lanai, and courtyard landscaping. Overall, the design of the convention center has attempted to minimize the overall height and bulk of the building. The peak of the roof has been limited to 138 feet above ground level. It should be noted that City and County zoning for this site would have allowed 350-foot high buildings which could have a greater impact on views in the area.

Mr. Christ P. Zivalich, Jr.
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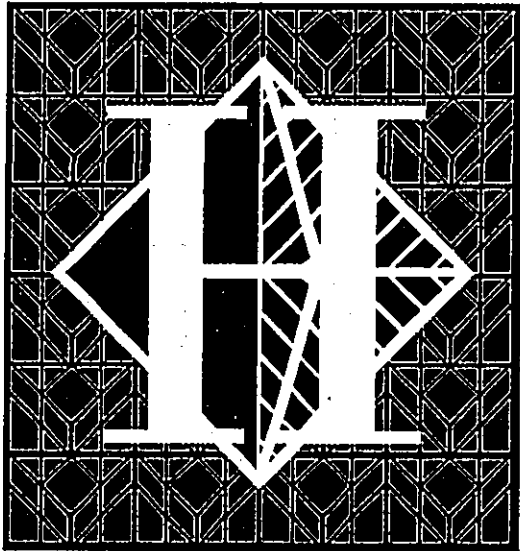
Your letter, along with this response, will be reproduced in the forthcoming Final Environmental Impact Statement. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Alan S. Hayashi
Executive Director

cc: Mr. Dennis Smith, Nordic/PCL
Mr. Eugene Watanabe, Wimberly Allison Tong & Goo
Mr. Earl Matsukawa, Wilson Okamoto & Associates, Inc.



Wilson Okamoto & Associates, Inc.

Planners • Engineers • Architects

Honolulu, Hawaii