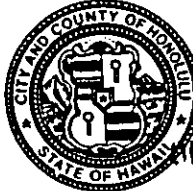


GTE Mobilnet Waikiki West Cell Site

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813 • (808) 523-4432

RECEIVED

JEREMY HARRIS
MAYOR



96 JUL 25 A8:36

PATRICK T. ONISHI
DIRECTOR

LORETTA K.C. CHEE
DEPUTY DIRECTOR

96/ED-002 (AC)
96-04312

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

July 19, 1996

The Honorable Gary Gill, Director
Office of Environmental Quality Control
220 South King Street, 4th Floor
State of Hawaii
Honolulu, Hawaii 96813

Dear Mr. Gill:

CHAPTER 343, HRS
Environmental Assessment/Determination
Finding of No Significant Impact

Recorded Owner : Barbara M. Poovey Trust c/o ANA Kalakaua Center
Applicant : GTE Mobilnet of Hawaii, Inc.
Agent : Arthur Y. Mori & Associates, Inc.
Location : 2155 Kalakaua Avenue, Waikiki, Oahu
Tax Map Keys : 2-6-03: 17, 18 and 20
Request : Zoning Variance within the Waikiki Special District
Proposal : Installation of an equipment enclosure and three (3) antennae atop the ANA Kalakaua Center

Attached and incorporated by reference is the Final Environmental Assessment (FEA) prepared by the applicant for the project. Based on the significance criteria outlined in Chapter 200, State Administrative Rules, we have determined that preparation of an Environmental Impact Statement is not required.

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the FEA. If you have any questions, please contact Art Challacombe of our staff at 523-4107.

Very truly yours,

Handwritten signature of Patrick T. Onishi in black ink.
PATRICK T. ONISHI
Director of Land Utilization

PTO:am
Enclosures
g:fea96ed2.adc

86

1996-08-08-0A-*FEA-GTE Mobilnet Waikiki West Cell site* - 8 1996
FILE COPY

Final Environmental Assessment (EA)
for
GTE Mobilnet Waikiki West Cell Site
at
ANA Kalakaua Center
Honolulu, Oahu, Hawaii
Tax Map Key: 2-6-03: 17, 18 & 20

RECEIVED
DEPT. OF LAND & NATURAL RESOURCES
HONOLULU, HAWAII
JUL 8 1996

Applicant

GTE Mobilnet of Hawaii, Inc.
733 Bishop Street, Suite 1900
Honolulu, Hawaii 96813
Telephone: (808) 536-4848

Agent

Jeffrey Mori
1314 South King Street - Suite 955
Honolulu, Hawaii 96814

July 1996

TABLE OF CONTENTS

I.	INTRODUCTION	1-2
A.	BASIC INFORMATION	1
1.	Owner	1
2.	Applicant	1
3.	Approving Agency	1
4.	Agency Consulted	1
5.	Agency Contacted	1-2
6.	Location	2
7.	Tax Map Key	2
8.	Lot Area	2
9.	Zoning	2
10.	Development Plan	3
II.	GENERAL DESCRIPTION OF THE PROPOSED ACTION	3-4
A.	TECHNICAL	3
B.	ECONOMIC	3
C.	SOCIAL	3
D.	ENVIRONMENTAL CHARACTERISTICS	4
III.	SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT	4-5
IV.	SUMMARY OF THE MAJOR IMPACTS	5

LIST OF APPENDICES

<u>Appendix</u>	<u>Description</u>
A	Antenna
B	Plot Plan

Draft Environmental Assessment (EA)
for
GTE Mobilnet Waikiki West Cell Site
at
ANA Kalakaua Center
Honolulu, Oahu, Hawaii
Tax Map Key: 2-6-03: 17, 18 & 20

I. INTRODUCTION

A. BASIC INFORMATION

1. Owner: Barbara M. Poovey Trust
c/o ANA Kalakaua Center
2155 Kalakaua Avenue
Honolulu, Hawaii 96815
2. Applicant: GTE Mobilnet of Hawaii, Inc.
733 Bishop Street
Suite 1900
Honolulu, Hawaii 96813
3. Approving Agency: City and County of Honolulu
Department of Land Utilization
650 South King Street
Honolulu, Hawaii 96813
4. Agency Consulted: City and County of Honolulu
Department of Land Utilization
650 South King Street
Honolulu, Hawaii 96813
5. Agency Contacted: Waikiki Improvement Assn.
Suite 703
2270 Kalakaua Avenue
Honolulu, Hawaii 96815

Waikiki Oahu Visitors Assn.
Suite 477
1001 Bishop Street
Honolulu, Hawaii 96813

Hawaii Visitors Bureau
Suite 801
2270 Kalakaua Avenue
Honolulu, Hawaii 96813

Hawaii Hotel Association
Suite 1103
2270 Kalakaua Avenue
Honolulu, Hawaii 96813

Honolulu Police Department
801 South Beretania Street
Honolulu, Hawaii 96813

American Red Cross
4155 Diamond Head Road
Honolulu, Hawaii 96816

Oahu Civil Defense Agency
650 South King Street
Honolulu, Hawaii 96813

State Civil Defense Agency
3949 Diamond Head Road
Honolulu, Hawaii 96816

F.E.M.A.
T112 Fort Shafter
Honolulu, Hawaii 96819

Honolulu Fire Department
3375 Koapaka Street
Honolulu, Hawaii 96819

6. Location:

The project site is located at 2155 Kalakaua Avenue. It is located at the intersection of Beachwalk and Kalakaua Avenue in Waikiki, Oahu.

7. Tax Map Key:

2-6-03: 17, 18 & 20

8. Lot Area:

40, 256 square feet

9. Zoning:

Waikiki Special District

10. Development Plan:

Land Use Map:

Resort Commercial Precinct

Public Facilities:

No improvements planned within the project site.

II GENERAL DESCRIPTION OF THE PROPOSED ACTION

A. TECHNICAL: The applicant proposes to install a prefabricated, free-standing, unmanned, equipment enclosure (approximately 11.5 feet wide by 15 feet in length) on the roof level of the ANA Kalakaua Center for electronic equipment and battery racks. The prefabricated, free-standing, unmanned, equipment enclosure will not be visible from the street level.

GTE Mobilnet proposes to install three (3) antennae (See Appendix A - Antenna). These three (3) antennae will be either pole-mounted or wall-mounted on three (3) separate locations on the rooftop (See Sheet A-2). The coaxial cables and rooftop antennae will be painted to blend in with the existing building.

B. ECONOMIC: The project cost will be approximately \$150,000.00.

C. SOCIAL: GTE Mobilnet serves the Island of Oahu with cellular telephone service. Cellular service is a critical element of the personal, public, and emergency communication network of Oahu.

The proposed installation of the three (3) antennae at this cell site is necessary in linking cellular services with the rest of Oahu, as presently a void exists in the Waikiki area. It is believed that this service will clearly benefit the Waikiki community.

D. ENVIRONMENTAL CHARACTERISTICS: GTE Mobilnet is sensitive to visual impact. To be visually pleasing and blend with the existing building, the coaxial cables which runs from the prefabricated, free-standing, unmanned equipment enclosure to antennae will be painted to blend in with the existing building.

III. SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT

The site is a 40,256 square foot parcel on which a 9-story structure stands. The project building is referred to as the ANA Kalakaua Center (formerly known as the Mitsukoshi Building). It is situated on the corner of Beachwalk and Kalakaua Avenue (See Appendix B-Plot Plan).

In terms of location, the site selected is suitable for the proposed use, due to its height, physical posture overlooking the area, its location in a commercial area, and the fact that the proposed improvements will barely affect the appearance of the rooftop.

The proposed rooftop antennae and telecommunication equipment enclosure will not impact public facilities, such as sewer and water and will have no impact on traffic, with preventive maintenance visits occurring approximately once a month. The roof access is restricted by a locked door.

The surrounding area is developed primarily for commercial and resort uses. There are a number of hotels and small commercial buildings surrounding the project. Other resort buildings nearby are the Bank of Hawaii Waikiki Building, Pleasant Holiday Isle, Edgewater Lanai, Waikiki Royal and the Hawaiiana Hotel, which would be the closest structures within view of the project site.

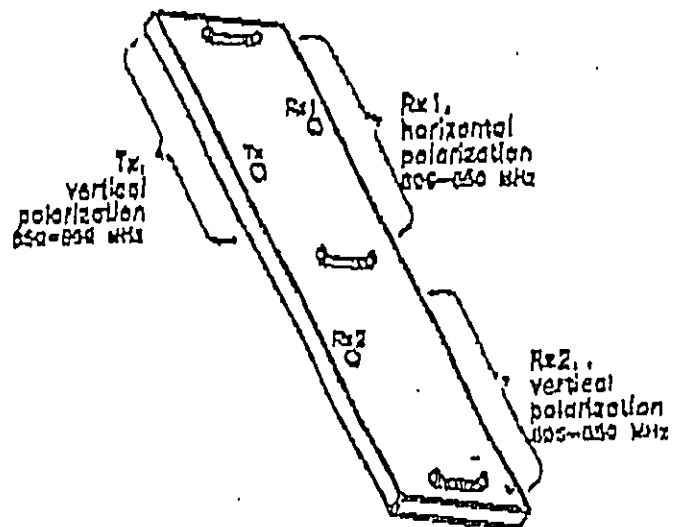
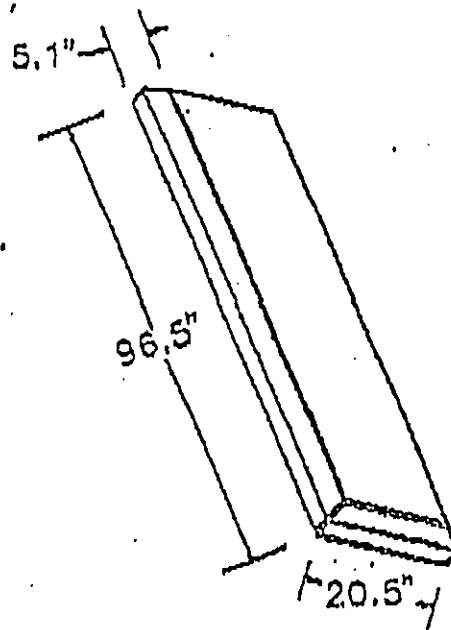
IV. SUMMARY OF THE MAJOR IMPACTS

The proposed project will not alter the character of nor will it impact the surrounding area, as the coaxial cables and rooftop antennae will be painted to blend in with the existing building.

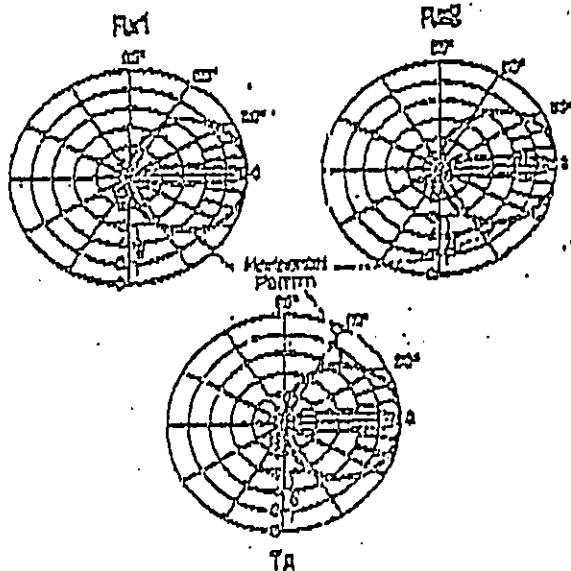
DB854HVH90D^E-SX

Three 11.5 dB, 806-896 MHz, 90° Panel Antennas in a Single Radome
(Polarization: Rx1: Horizontal, Rx2: Vertical, Tx: Vertical)

Model Number	DB854HVH90D ^E -SX
Impedance	50 ohms
Termination	"N" or 7-18 DIN ("E")
Frequency Range	Horizontal Pol, Rx1: 806-896 MHz Vertical Pol, Rx2: 806-896 MHz Vertical Pol, Tx: 850-896 MHz
Gain	11.5 dB ± 0.5, dach
VSWR	≤ 1.8:1
Beamwidth (2dB from max)	90° Horizontal (H & V) 15° Vertical (H & V)
Polarization	Vertical & Horizontal
Max. Input Power	500 Watts
Other Information	Single viple antenna for one cell sector.
Weight	41 lbs
Wind Area	1970 in ²
Wind Load	± 647 lbs (2920N) 280 kp (100 mph)
Max. Wind Speed	129 mph (200 km/h)
Material	Radiators: Silver-plated Brass Back Panel: Pass. Aluminum Radome: ABS Mounting Hdw: Galvanized Steel
Color, Radome	Light Gray
Mounting	Included for 3.5" mast
Mount Bracket (Optional)	DB5091-2
Packing Size	88" x 26" x 12"
Shipping Weight	60 lbs



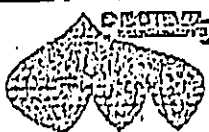
Radiation Patterns (Relative Field Strength) Bandwidth



Three 4 ft. panel antennas (2 vertically, 1 horizontally polarized) in a single 8 ft radome.

Each of the three antennas cover the same geography; 90° across the horizon and 15° in the vertical plane.

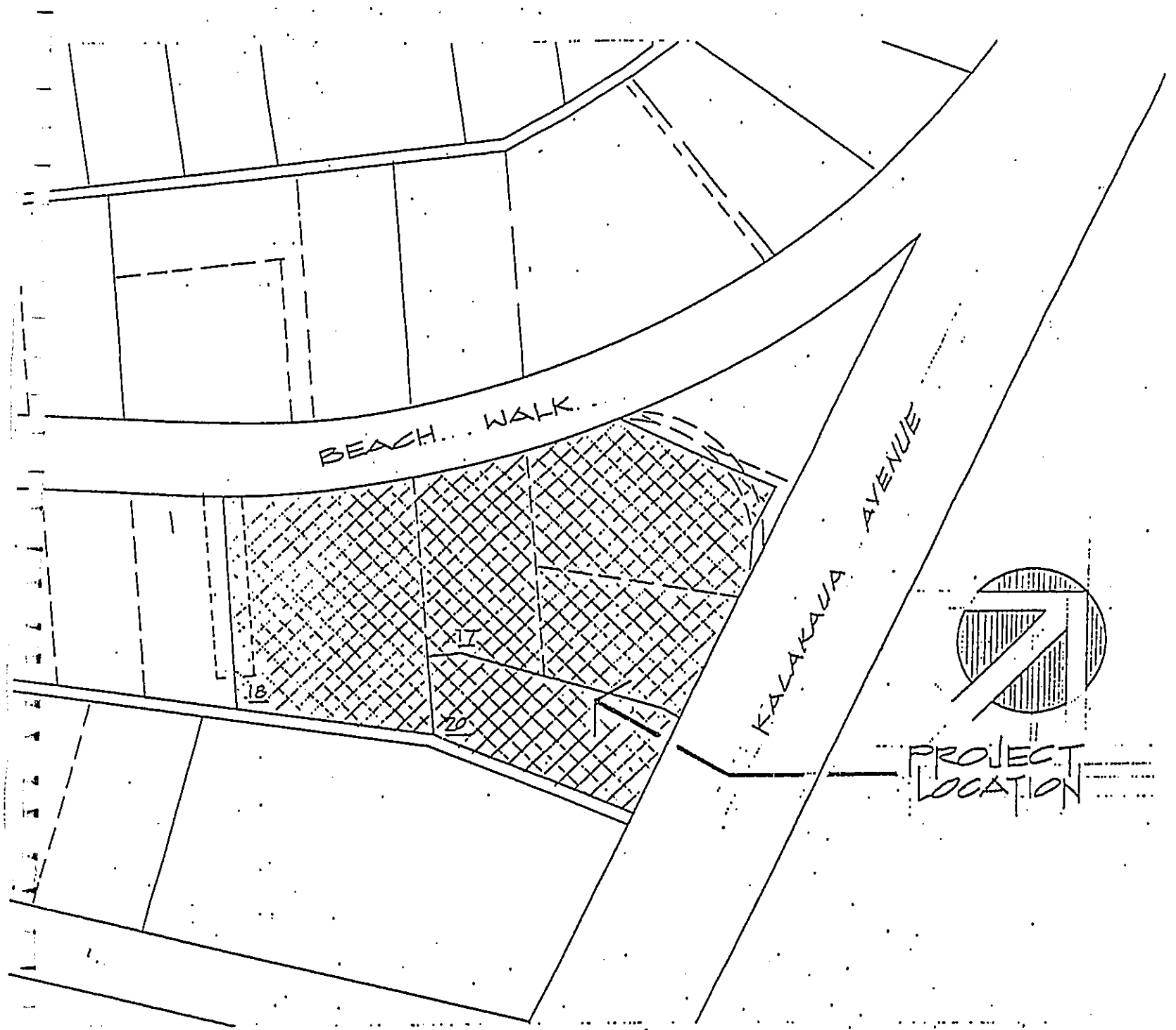
099096-000-B 8/95



DECIBEL PRODUCTS
A Division of the ALLEN TELECOM GROUP

8635 Stonington Freeway • P. O. Box 589610 • Dallas, Texas 75358-9610
214/631-0310 • Fax: 214/631-4708





P L O T P L A N

NOT TO SCALE

CERTIFICATE FOR TELECOMMUNICATIONS ANTENNA

This form is to be submitted along with building permit applications for telecommunication antennas. It shall be signed by the building permit applicant who shall be responsible for meeting the exclusion distance (setbacks) required by the Land Use Ordinance (LUO), and the veracity of information submitted herein.

Building permit plans shall include a delineation of the exclusion distance, and shall provide any additional information to demonstrate that fencing or other measures are being taken to restrict public access within this distance.

Please type or print legibly all required information.

Tax Map Key: 2-6-03:17, 18 & 20

Applicant: GTE Mobilnet of Hawaii, Inc.
(If company, list company name)


Brief Description of the Type of Antenna: 11.5 dB Gain
(E.g. land-mobile, paging service; mast antenna, dish. If antenna is an independent operational fixed-point microwave or receiving-only antenna, that does not qualify as an accessory use, please note this here; no other additional information is required for these antennas.)
Panel Antennas

Effective Radiated Power (ERP) of Antenna(s): 100 watts
(If more than one antenna is being proposed, or if an antenna is being added to a site where there are already other antennas, indicate combined ERP)

Computation of Exclusion Distance (ED) in feet:

$$\text{Exclusion Distance (in feet)} = .0325 \sqrt{796\text{ERP}}$$

Using the above formula, the Exclusion Distance is 9 feet

 3/12/96
Applicant Date
(If company, authorized signature)

CITY AND COUNTY OF HONOLULU
 DEPARTMENT OF LAND UTILIZATION
 650 South King Street, 7th Floor
 Honolulu, Hawaii 96813

DLU MASTER APPLICATION FORM

Additional data, drawing/plans, and fee requirements are listed on a separate sheet titled "Instructions for Filing."
 PLEASE ASK FOR THESE INSTRUCTIONS.

All specified materials and fees must accompany this form; incomplete applications could delay processing. You are encouraged to consult with department staff in completing the application. Please call the appropriate phone number given in the "Instructions for Filing" sheet.
 Please print legibly or type the required information.

PERMIT REQUESTED (Check one or more as appropriate):

- | | | | |
|---------------------------------|--|--|---|
| Clusters: | <input type="checkbox"/> Agricultural Cluster | <input type="checkbox"/> Park Dedication | <input checked="" type="checkbox"/> Special Management Area Permit/Assessment |
| | <input type="checkbox"/> Cluster Housing | <input type="checkbox"/> Plan Review Use | <input type="checkbox"/> State Special Use Permit |
| | <input type="checkbox"/> Country Cluster | <input type="checkbox"/> Planned Development-Housing | <input type="checkbox"/> Subdivision |
| | | <input type="checkbox"/> Shoreline Setback Variance | <input type="checkbox"/> Sunlight Reflection |
| | | <input type="checkbox"/> Site Plan Review | <input checked="" type="checkbox"/> Variance from LUO Sec.(s):
180-6 |
| Conditional Use Permits: | <input type="checkbox"/> Type 1 | <input type="checkbox"/> Type 2 | <input type="checkbox"/> Waiver (public uses/utilities) |
| | <input type="checkbox"/> Existing Use | <input checked="" type="checkbox"/> Special District:
Waikiki | <input type="checkbox"/> Zero Lot Line |
| | <input type="checkbox"/> Flood Hazard Variance | (Indicate District) | <input type="checkbox"/> Zone Change, From _____ to _____ |
| | | | <input type="checkbox"/> Zoning Adjustment, LUO Sec.(s): _____ |

TAX MAP KEY(S): 2-6-03: 17, 18 & 20
 LOT AREA: 40,256 Sq. Ft.
 ZONING DISTRICT: Resort/Commercial STATE LAND USE DISTRICT: Urban

STREET ADDRESS/LOCATION OF PROPERTY: _____

RECORDED FEE OWNER:
 Name: BARBARA M. POOVEY TRUST
 Mailing Address: c/o ANA Kalakaua Center Partners
2155 Kalakaua Ave. Ste. 502
(808) 924-2155
 Signature: GRAHAM MURATA RUSSELL
Its authorized agent P/M ANA
KALAKAUA PARTNERS

APPLICANT:
 Name: GTE MOBILNET OF HAWAII, INC.
 Mailing Address: 733 Bishop Street - Suite 1900
Honolulu, Hawaii 96813
 Phone Number: (808) 536-4940
 Signature: _____

PRESENT USE OF PROPERTY/BUILDING: _____

AUTHORIZED AGENT/CONTACT PERSON:
 Name: Jeffrey Y. Mori
 Mailing Address: 1314 South King Street - Ste. 955
Honolulu, Hawaii 96814
 Phone Number: (808) 596-2421
 Signature: _____

PROJECT NAME (if any): GTE Mobilnet Waikiki
West Cell Site

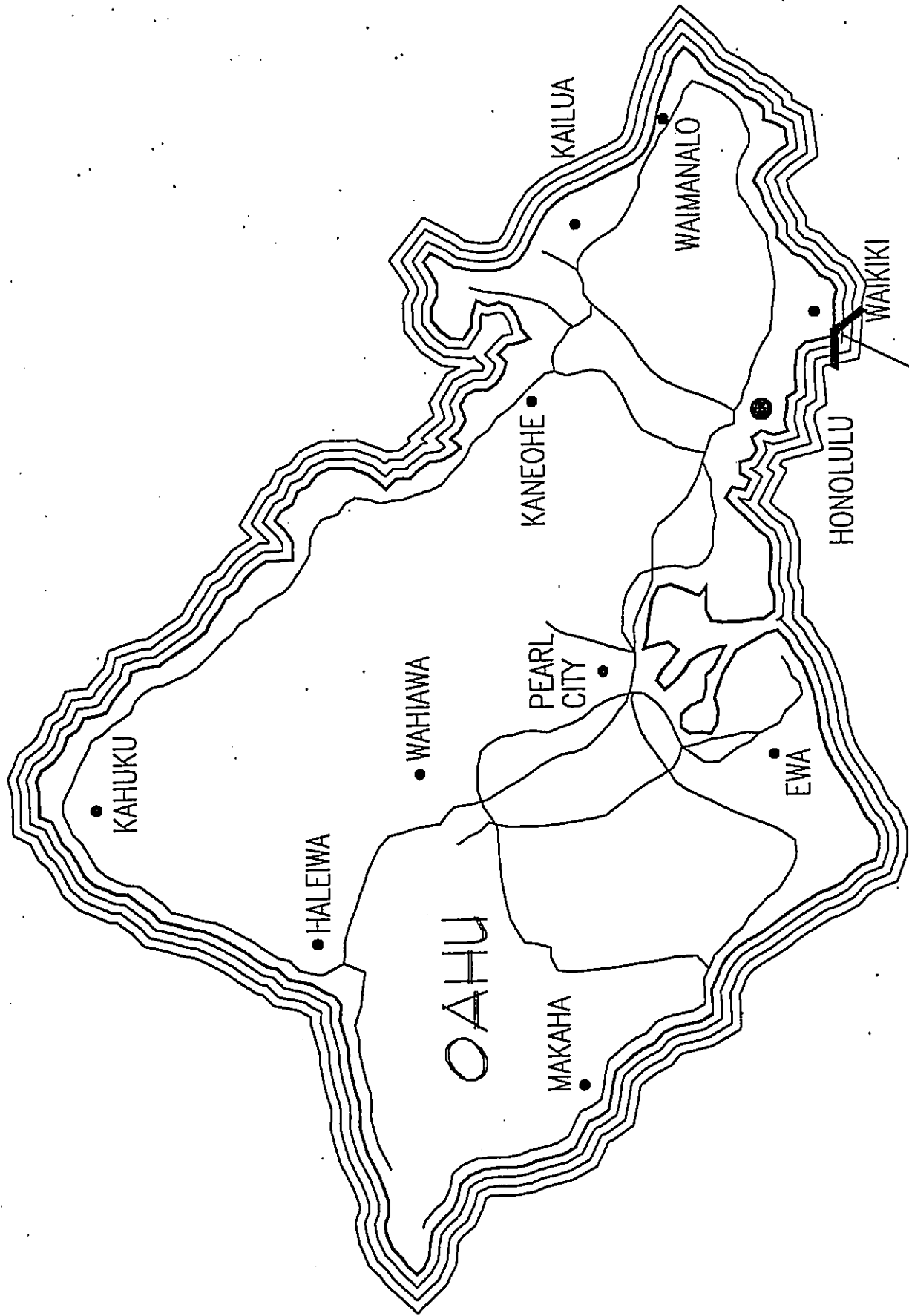
PROJECT PROPOSAL (Briefly describe the proposed activity or project): Installation of new GTE Mobilnet
telecommunication antenna facility.

FOR DEPARTMENT USE ONLY
 Submitted Fee Amount: \$ _____
 Date Application Accepted: _____ Accepted By: _____
 Date of Public Hearing: _____
 Approved
 Approved with conditions indicated below.
 Denied for reason(s) given below.
 Exempt project.
 FILE NO. _____

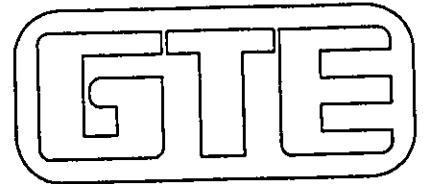
THIS COPY, WHEN SIGNED BELOW, IS NOTIFICATION OF THE ACTION TAKEN.

 Signature Title Date

The above approval does not constitute approval of any other required permits, such as building permits.



PROJECT LOCATION



GTE MOBILNET WAIKIKI WEST

ANA KALAKAUA CENTER

2155 Kalakaua Avenue

Honolulu, Hawaii

Tax Map Key: 2-6-3: 17, 18 &

LUO DATA

Tax Map Key: 2-6-3-17, 18 & 20
Address: 2155 Kalakaua Avenue
Honolulu, Hawaii 96815
Zoning: Waikiki Special District
Resort/Commercial Precinct
Principal Use: Office Building
Lot Area: 40,256 Square Feet
Building Hgt: 9 Stories @ 115'-0"

PARKING

No Change

LOADING

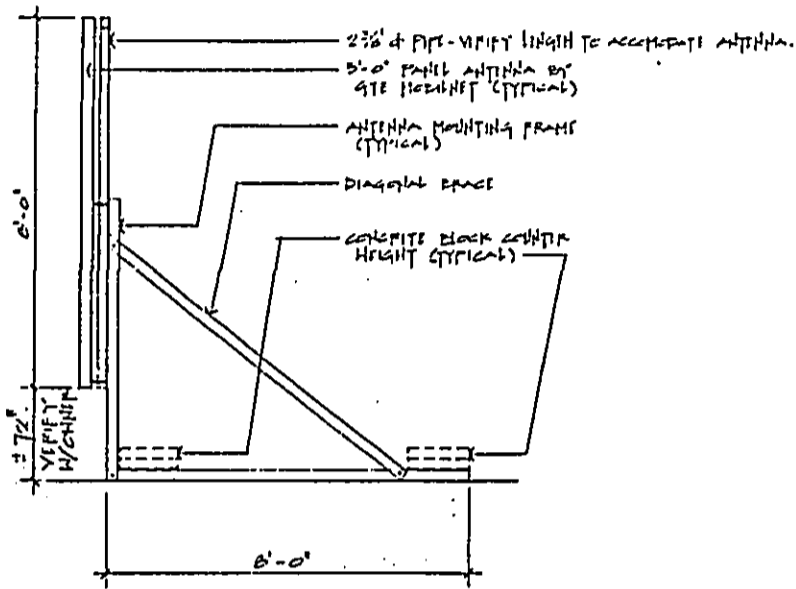
No Change

1. All work to conform to 1991 edition of UBC and all codes and ordinances.
2. All work is to be performed in accordance with these plans and project specifications.
3. All wood in contact with concrete or masonry shall be pressure-treated wood of any species or foundation grade cedar or redwood, all marked by an approved testing agency.
4. Contractor shall be responsible for verifying all existing conditions and dimensions in the field and coordinating all new work with existing conditions.
5. Contractor shall be responsible for repairing damage to existing work to remain. When existing work and items are removed, match existing adjacent materials and provide contiguous smooth transitions from existing to new finishes.
6. All applied surface materials and finishes shall conform to Building Department flame spread requirements.
7. Notify Architect of any conflicts or changes to these drawings or specifications.

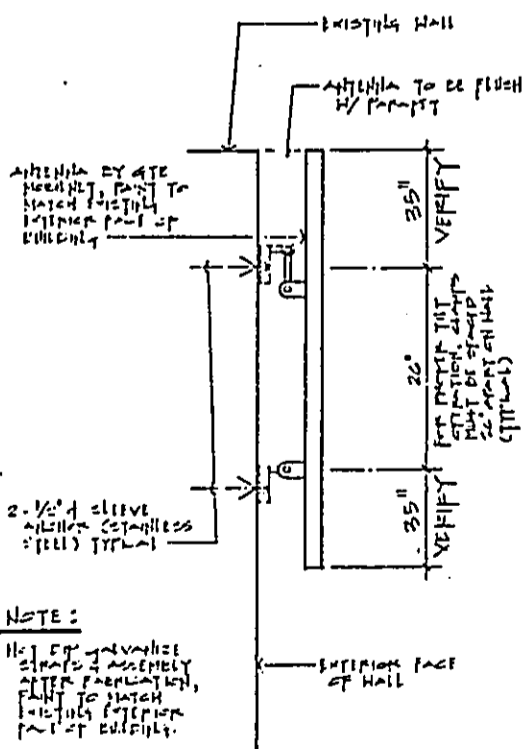
A BUILDING INFORMATION
A-1

B GENERAL NOTES
A-1

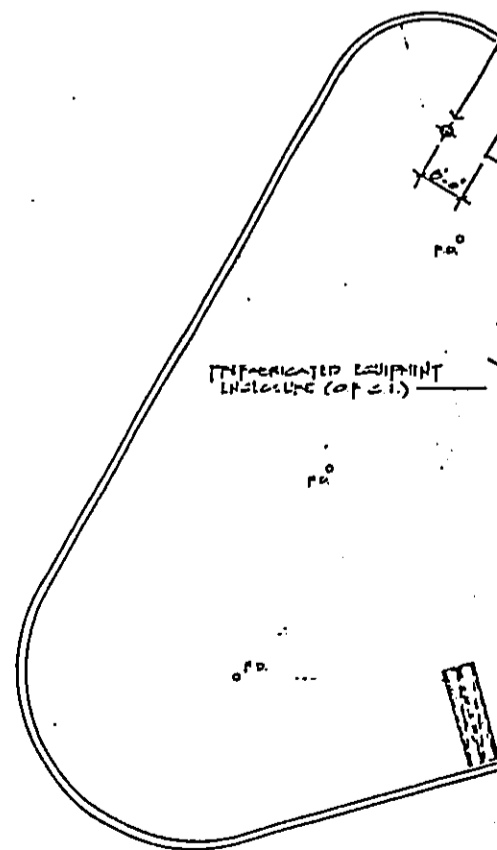
DOCUMENT CAPTURED AS RECEIVED



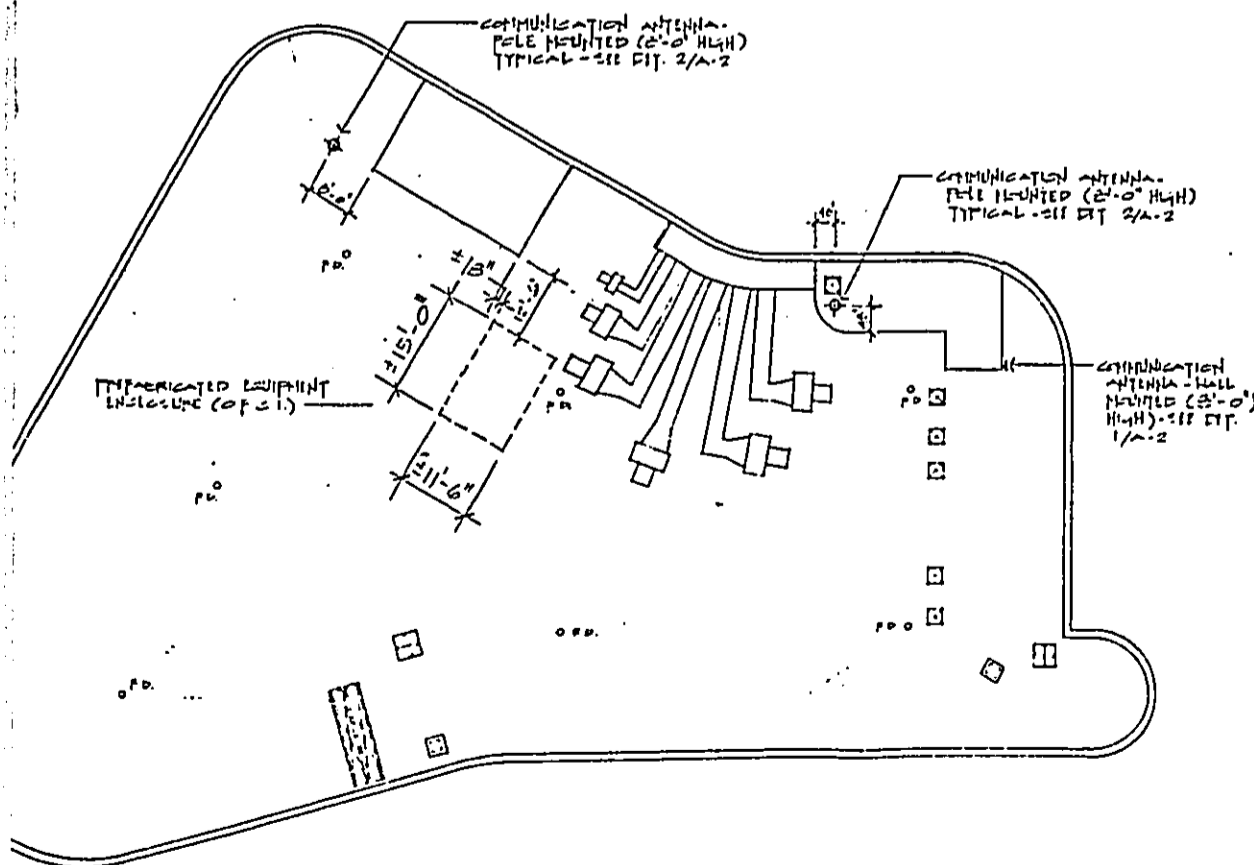
B ANTENNA MOUNTING DETAIL
 A-2 SCALE: 1/2" = 1'-0"



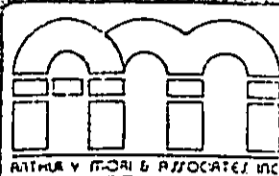
A ANTENNA MOUNTING DETAIL
 A-2 SCALE: 1" = 1'-0"



A ROOF
 A-2 SCALE: 1/2"



A ROOF LEVEL FLOOR PLAN
 A-2 SCALE: 1/8" = 1'-0"



ARTHUR Y. MORI & ASSOCIATES, INC.

ARCHITECTS AIA
 1314 SOUTH KING STREET, SUITE 954
 HONOLULU, HAWAII 96814

GTE MOBILNET WAIKIKI WEST CELL SITE
ANA KALAKAUA CENTER
 2155 Kalakaua Avenue
 Honolulu, Hawaii
 Tax Map Key: 2 - 6 - 3: 17, 18 & 20

PROJECT NO. 98-001
 SHEET NO. 1 OF 2
 ROOF LEVEL FLOOR PLAN AND ANTENNA MOUNTING DETAILS



The work prepared by me or under my supervision and completion of the project will be under my direct supervision as defined in Chapter 10-111 of the Hawaii Administrative Rules, Department of Commerce and Consumer Affairs, Licensed Professional Engineers, Architects, Surveyors and Landscape Architects.

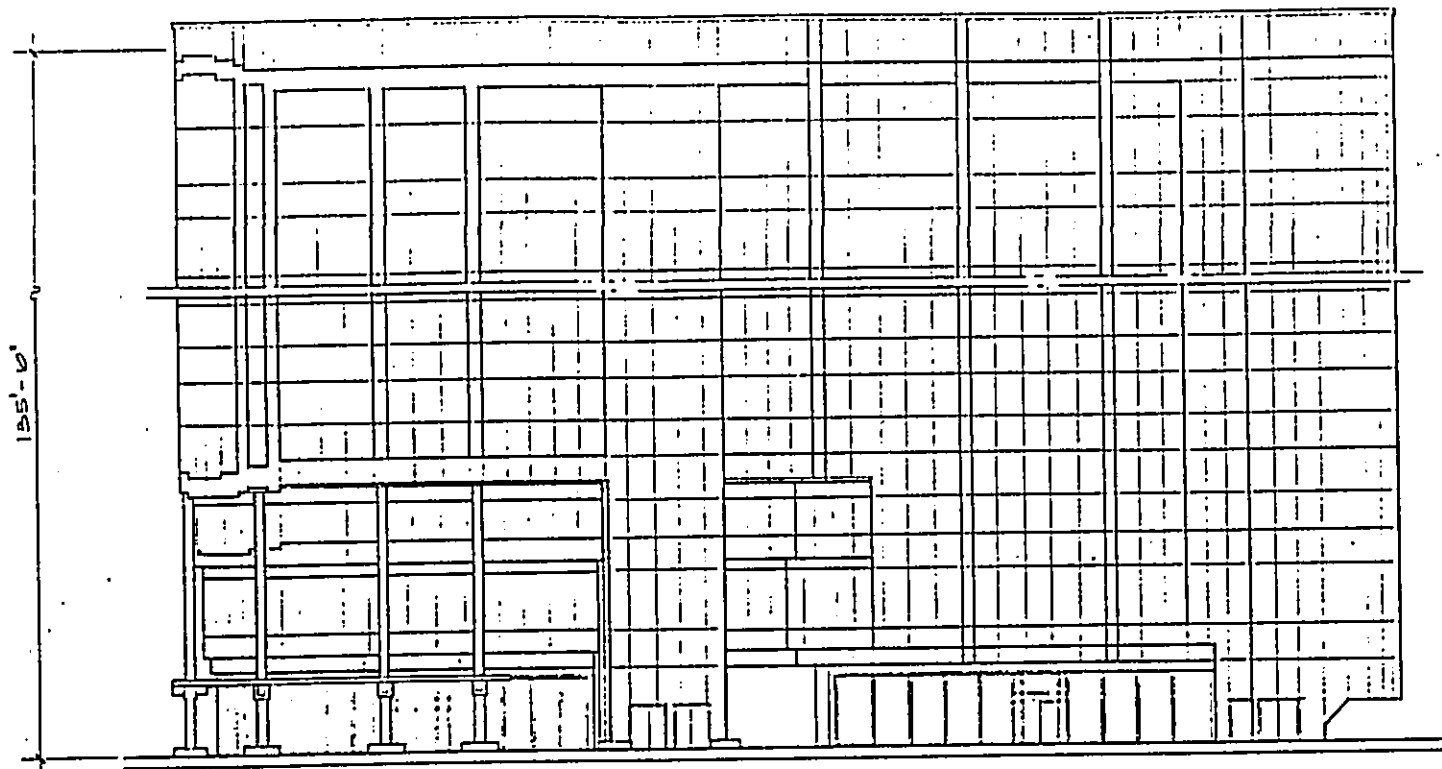
Arthur Y. Mori

NOTE: Contractor to check and verify all dimensions at job before proceeding with work.

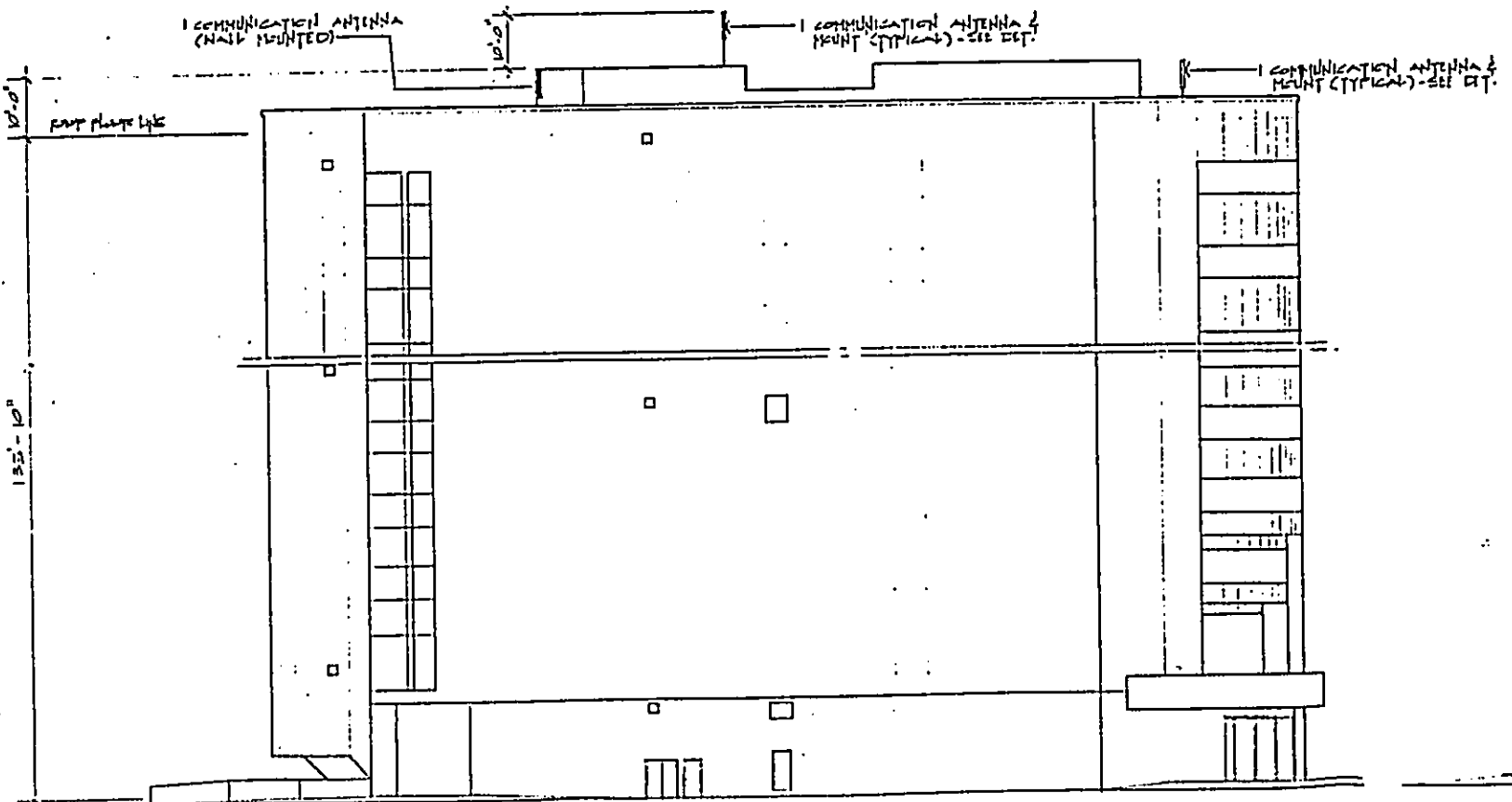
NO.	REVISION

SHEET **A-2** DATE: 12/11/98
 OF 2 SHEETS

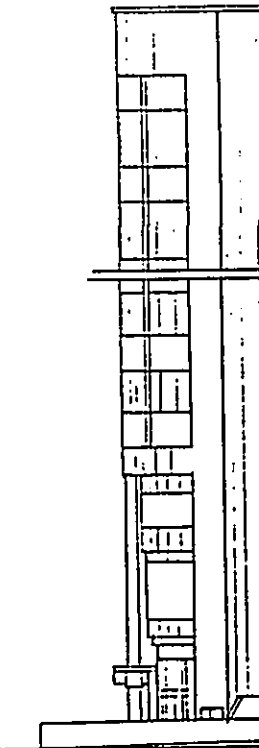
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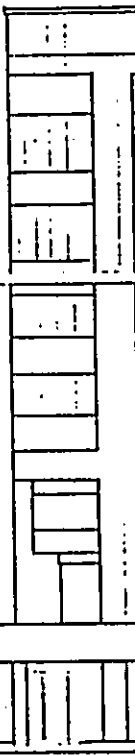
D WEST SIDE ELEVATION (Beach Walk)
A-B 1/8" = 1'-0"



B EAST SIDE ELEVATION

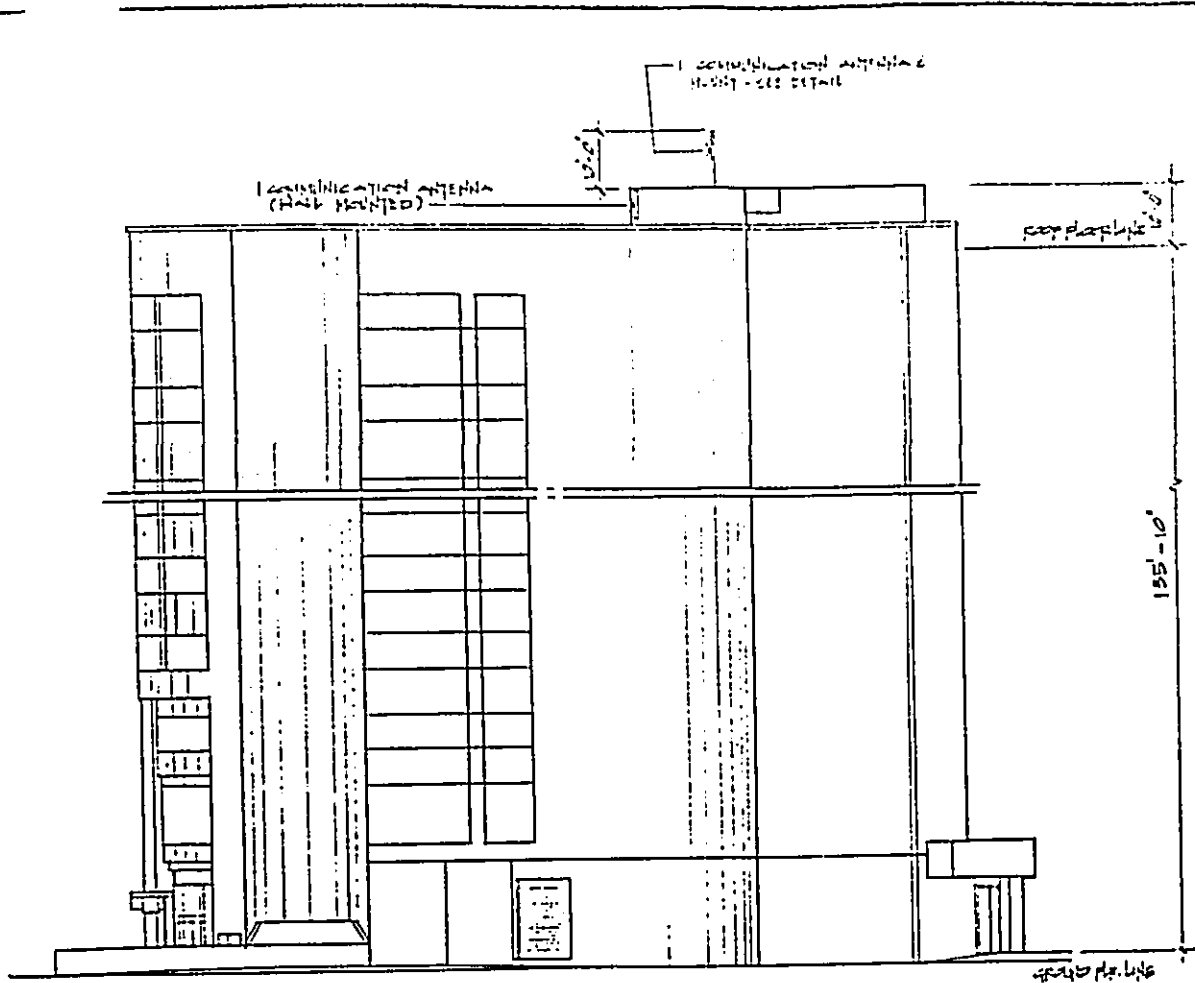


C SOUTH SIDE ELEVATION
A-B 1/8" = 1'-0"



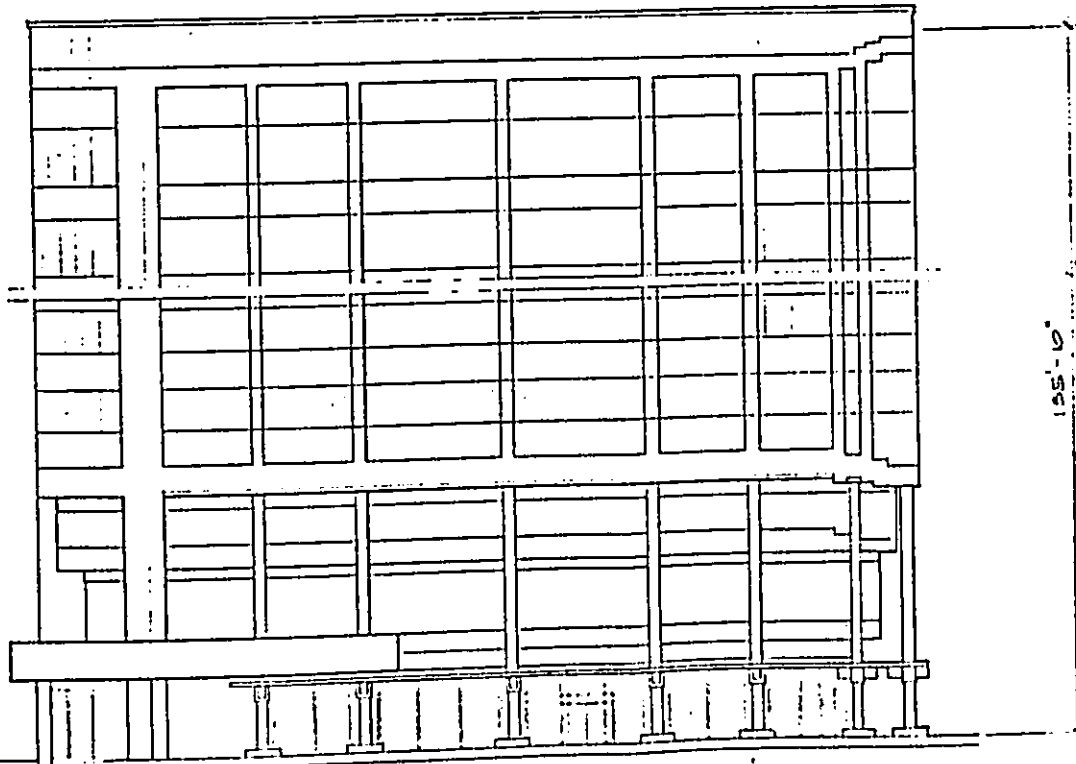
A NORTH SIDE ELEVATION

DOCUMENT CAPTURED AS RECEIVED

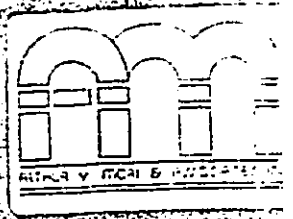


C SOUTH SIDE ELEVATION
A-3 155'-0"

COMMUNICATION ANTENNA & MOUNT (TYPICAL) - SEE DET.



A NORTH SIDE ELEVATION (Kalokaua Avenue)



ARCHITECT Y. MOI & ASSOCIATES
1514 SOUTH KING STREET, 22
HONOLULU, HAWAII 96813

GTE MOBILNET WAIKIKI WEST CELL SITE
ANA KALAKAUA CENTER
2155 Kalakaua Avenue
Honolulu, Hawaii
Tax Map Key: 2 - 6 - 3: 17, 18 & 20

SEE THESE ELEVATIONS.



The work was prepared by me or under my supervision and I am a duly licensed and registered professional architect in the State of Hawaii. I am not providing any professional services in any other jurisdiction. I am not providing any professional services in any other jurisdiction. I am not providing any professional services in any other jurisdiction.

Y. MOI

NO.	REVISION

SHEET **A-3** DATE 12-11-97

BENJAMIN J. CAYETANO
GOVERNOR



GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

220 SOUTH KING STREET
FOURTH FLOOR
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186

June 3, 1996

Patrick K. Onishi, Director
Department of Land Utilization
650 South King Street
Honolulu, Hawaii 96813

Attention: Art Challacombe

Dear Mr. Onishi:

RE: Draft Environmental Assessment (EA) for GTE Mobilnet Site at ANA
Kalakaua Center, Waikiki; TMK 2-6-3: 17, 18 & 20

In the final EA please indicate the status of the permit(s) if the project is located in
the Special Management Area or in the Shoreline Setback.

If you have any questions, call Nancy Heinrich at 586-4185.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Gill".

GARY GILL
Director

c: Jeffrey Mori

June 4, 1996

1314 SOUTH KING / SUITE 955
HONOLULU, HAWAII 96814
PHONE (808) 596-2421
FAX (808) 591-2414

ARTHUR MORI & ASSOCIATES, INC.
ARCHITECTS AIA

Office of Environmental Quality Control
220 S. King Street, 4th Floor
Honolulu, Hawaii 96813

Attention: Mr. Gary Gill
Director

Subject: Final Environmental Assessment (EA)
for GTE Mobilnet Waikiki West Cell Site
at ANA Kalakaua Center, Waikiki
TMK: 2-6-3: 17, 18 & 20

Gentlemen:

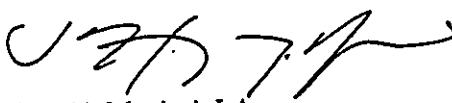
We are in receipt of copy of your letter addressed to the Department of Land Utilization dated 6/5/96. We offer the following response to your comment:

Comment #1. The project location is not located within the Special Management Area or Shoreline Setback.

If you have any questions, please call.

Sincerely,

ARTHUR Y. MORI & ASSOCIATES, INC.


Jeffrey Y. Mori, A.I.A.

JYM:ljh

Final Environmental Assessment (EA)
for
GTE Mobilnet Waikiki West Cell Site
at
ANA Kalakaua Center
Honolulu, Oahu, Hawaii
Tax Map Key: 2-6-03: 17, 18 & 20

Addendum A

PART II: GENERAL DESCRIPTION OF THE PROPOSED ACTION

A. **TECHNICAL:** The applicant proposes to install a prefabricated, free-standing, unmanned, equipment enclosure on the roof level of the ANA Kalakaua Center for electronic equipment and battery racks.

There are two types of cellular technologies available, analog and digital. GTE Mobilnet's cellular network is based on analog technology.

The quantity of analog electronic equipment and battery racks are determined by the area being served. The resulting prefabricated equipment enclosure (approximately 11.5 feet wide by 15 feet in length) is designed and sized to a minimum to accommodate the analog equipment and battery racks. In addition, minimum clearances as required by the National Electric Code (NEC) are also accounted for in design and sizing of this prefabricated equipment enclosure.

The prefabricated equipment enclosure will be positioned so as not to be visible from the street level.

The height of the prefabricated equipment enclosure will not exceed the highest structure on the roof which is the existing elevator machine room.

GTE Mobilnet also proposes to install three (3) antennae (See Appendix A-Antenna). These three (3) antennae will be either pole-mounted or wall-mounted on three (3) separate locations on the rooftop (See Sheet A-2). The coaxial cables and rooftop antennae will be painted to blend in with the existing building.

VARIANCE

A. BACKGROUND: GTE Mobilnet of Hawaii is requesting a variance to Sections 7.80-5, 7.80-6 and 7.80-7 of the LUO pertaining to use regulations and density for its proposed cell Site at the ANA Kalakaua Center in the Waikiki District.

A variance for use is needed because the DLU has classified the proposed cell site as a Type B - Utility Installation which is neither a permitted nor conditional use in the Waikiki District.

A variance for density is also needed because the proposed equipment storage structure related to the cell site will increase the floor area at the project site which already exceeds the allowable FAR or Floor Area Ratio.

To support our request we offer the following information in response to the three "Tests of Hardship" required before a variance is granted.

B. USE VARIANCE: Cellular telephone service fulfills a public need and is a critical element of the personal, public and emergency communications network of Oahu. Establishment of the proposed cell site will allow GTE Mobilnet to adequately serve the West Waikiki area.

The ANA Kalakaua site was selected because of its height and central location in Waikiki which will allow the best coverage for cellular service.

The related prefabricated equipment storage structure and three antennae are small, will not exceed the maximum allowable height of 280 feet and will not be visible from the street.

The equipment storage structure will be unmanned and will not produce noise nor have any impact to traffic.

The proposed facility has been classified a Type B - Utility Installation and is a permitted use in most zoning districts by Conditional Use Permit - Type 1.

However, in the Waikiki District, Type B - Utility Installations are not permitted in any precinct.

The applicant would be denied reasonable use if not allowed a Type B - Utility Installation.

The request is due to unique circumstances and will not alter the essential character of the neighborhood.

C. DENSITY VARIANCE: There are two types of cellular networks available, analog and digital.

GTE Mobilnet's cellular network is based on analog technology. Digital technology allows the use of small cabinets for its cell sites. Analog technology will not allow these similar sized cabinets to be used.

Instead the storage structure's footprint or floor area which is required to house and protect the analog electronic equipment racks is sized based on the *quantity* of equipment racks which is determined by the area being served with cellular service.

The resulting prefabricated equipment storage structure with dimensions of approximately 11'-6" wide x 15'-0" long x 9'-6" high is designed to a *minimum* to accommodate the analog equipment racks and the required minimum clearances as found in the National Electric Code (NEC).

It is important to note that cellular networks using digital technology in order to provide the same area coverage for cellular service provided by this cell site would require many more sites, equipment and antennae than this one site proposed by GTE Mobilnet.

In addition, the prefabricated equipment storage structure will be positioned so as not to be visible from the street level and the height of the prefabricated equipment storage structure will not exceed the highest structure on the roof which is the existing elevator machine room.

Based on this, the applicant would be denied reasonable use if not allowed a variance to density.

The request is due to unique circumstances and will not alter the essential character of the neighborhood.