April 27, 2001

Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control
State Department of Health
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Finding of No Significant Impact (FONSI) for Kalo Place Mini Park
        TMK: 2-8-24: parcel 35, Moliiili Area of Honolulu, Oahu, Hawaii

The City and County of Honolulu’s Department of Design and Construction has reviewed the comments received during the 30-day comment period which began on February 23, 2001. The agency has determined that this project will not have significant environmental effects and has issued a FONSI. Please publish this notice in the May 23, 2001 OEQC Environmental Notice.

We have enclosed a completed OEQC Publication Form and four copies of the Final Environmental Assessment.

If there are any questions, please call Gregory Hee at 527-6977.

Very truly yours,

RAE M. LOUI, P.E.
Director

RML:kw
Enc.
FINAL
ENVIRONMENTAL ASSESSMENT

2001-05-23-OA-FEA-

KALO PLACE MINI PARK
PROJECT
Moiliiili area of Honolulu, Oahu, Hawaii

Prepared For:
The Department of Design & Construction
City and County of Honolulu

Prepared By:
Townscape, Inc.

May 2001
FINAL
ENVIRONMENTAL ASSESSMENT

Kalo Place Mini Park Project
Moli'iili area of Honolulu, Oahu, Hawaii

This document has been prepared pursuant to
Chapter 343, Hawaii Revised Statutes

Prepared For:
The Department of Design and Construction
City and County of Honolulu

Prepared By:
Townscape, Inc.
900 Fort Street, Suite 1160
Honolulu, HI 96813

May 2001
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SECTION 1
INTRODUCTION AND SUMMARY

1.1. INTRODUCTION AND PURPOSE

The City and County of Honolulu's Department of Design and Construction is planning to develop a public mini park for the purpose of providing a passive recreation area and open space for the residents and employees that reside and work in the vicinity of the project site. The project is identified as "Kalo Place Mini Park", TMK: 2-8-24: parcel 35, which is a one-acre vacant parcel owned by Kamehameha Schools. The City is in the process of acquiring the property from Kamehameha Schools.

1.2. PROJECT SUMMARY

Project Name: Kalo Place Mini Park
Location: The undeveloped site fronts Varsity Place and is just makai of the H-1 Freeway. It is the former site of the GASCO gas spheres.
Proposing Agency: Department of Design and Construction
City and County of Honolulu
Environmental Assessment prepared by:
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813
Attention: Ms. Mary O'Leary, AICP, Senior Planner
Accepting Authority: Department of Design and Construction
City and County of Honolulu
Anticipated Determination: A "Finding of No Significant Impact" (FONSI) is anticipated because no significant adverse environmental impacts are expected as a result of the proposed project.
1.3. PROJECT LOCATION

The site is located in the Moiliili area of Honolulu (Figure 1), along the makai-side of the H-1 Freeway and mauka of the business district fronting King Street and University Avenue. The project property, although currently vacant, is perhaps most commonly known as the former site of GASCO’s two steel natural gas spheres, otherwise known as the “gas balls”.

The H-1 Freeway runs along the site’s mauka boundary, the Hawaiian Humane Society is located along the project site’s Diamond Head property boundary, a row of commercial buildings fronting King Street is located adjacent to and makai of the property, and a three-story commercial building fronting Kalo Place is adjacent to the site’s Ewa property boundary (Figure 2). Access to the site is off of Varsity Place, which forms a T-intersection with Kalo Place near the project site entrance.

1.4. PROJECT DESCRIPTION

The Kalo Place Mini Park project is a concept that emerged from the City and County of Honolulu’s “21st Century Oahu – A Shared Vision for the Future” island-wide visioning process. In 1999, Vision Team #10: Makiki, McCully, Moiliili, Manoa (Moiliili/Makiki/Manoa) identified the proposed project as one of the Team’s priority projects. The project was then funded in the City’s FY 2000 Capital Improvements Program (CIP) Budget for a total of $1,142,300 to acquire land for the mini park, and $45,000 for planning and design. The project was allocated $50,000 in the FY 2001 CIP budget to construct park improvements.

The proposed mini park will be landscaped with shade trees and grass-covered mounds grouped along a meandering concrete walkway that loops through the site, with picnic tables scattered throughout where people can congregate or “talk story”. The park is intended to primarily serve the residents of the relatively high-density apartment buildings in the surrounding area, but would also be enjoyed by the employees of the area’s businesses. The park is to be a “day-use” park. The mini park’s proximity to the surrounding apartment complexes and businesses will make it convenient for park users to walk to the site. Pedestrian access to the mini park will be off of Varsity Place, which forms a T-intersection with Kalo Place near the park’s entrance. No on-site parking or comfort station will be provided due to the relatively small size of the site and the park’s passive recreational character. No playground equipment is planned at this time.
FIGURE 1
GENERAL LOCATION MAP
KALO PLACE MINI PARK
Island of Oahu
For: Lester Inouye, Associates
By: Townscape, Inc.
May 2001
1.5. SUMMARY OF IMPACTS AND MITIGATION MEASURES

1.5.1. Environmental Impacts

Except for short-term dust and noise impacts from grading and construction, development of the project will not have any adverse effects on the physical environment. The site is currently vacant (except for the temporary storage of construction materials and equipment), and was previously disturbed in 1946 and again in 1995 when GASCO originally installed and then removed from the site the two steel spheres which contained natural gas and the related natural gas piping.
1.5.2. **Social and Economic Impacts**

The project is a public mini park that will provide a passive recreational area and open space for residents and employees of the surrounding relatively high-density apartment developments and area businesses. During the construction phase of the project, direct and indirect jobs will be created.

1.5.3. **Public Facilities and Services**

There are no facilities or permanent structures planned for the mini park other than a meandering concrete walkway, picnic tables, and a drinking fountain. Water and electricity service will be required for the irrigation system and drinking fountain. No communications services are required. The mini park will be lighted at night. Light fixtures will be baffled so as to avoid glare and light spillage into the surrounding properties. Over ninety percent of the site will be landscaped pervious surface – no drainage improvements will be constructed. There will be no increase in storm water runoff leaving the site. Police protection will be provided by the City and County of Honolulu’s Police Department District 7 (Patrol) office, and fire protection will be provided by the Honolulu Fire Department, McCully Fire Station No. 20.

1.6. **RELATIONSHIP TO PLANS, POLICIES AND CONTROLS**

1.6.1. **Hawaii State Plan and Functional Plans**

The project is consistent with the Hawaii State Plan and Functional Plans by providing needed recreational and open space within urban Honolulu with no significant adverse impact on the physical, social or economic environments.

1.6.2. **State Land Use**

The project is within the State “Urban” District, according to the State Land Use maps. A passive recreational mini park is an allowed land use within in the State “Urban” District.
1.6.3. City and County of Honolulu Primary Urban Center Development Plan and Zoning

The project is designated as Public and Quasi-Public a = “Public Facility” on the Primary Urban Center Development Plan and, as a Public Facility, the mini park is an allowable use under the site’s R-5 Residential Zoning designation. In June 1999, Ordinance 99-35 amended the Primary Urban Center Development Plan’s Public Facility Map in order to place a “Park” symbol on the project site.

1.7. NECESSARY PERMITS AND APPROVALS

The necessary permits and approvals to develop the project will be acquired including, grading and building permits from the City and County of Honolulu, and compliance with the State Department of Health’s fugitive dust control measures.

1.8. ALTERNATIVES CONSIDERED

The “No Action” alternative would mean that area residents and business employees would be without a nearby passive recreational park or open space that would provide relief from the relatively high-density urban environment of this area. The nearest public park is Moiliili Neighborhood Park located approximately one third of a mile away from the project site.

Alternatives that will be considered for this project, based on input received from the Vision Team #10 members, deal mainly with the internal configuration of the site and an alternative park-type, such as a “Bark Park” for dogs.

Another alternative that is discussed is the possibility that the current landowner – Kamehameha Schools – could sell or develop the subject property for commercial or private use by someone other than City and County of Honolulu.
SECTION 2
PROJECT DESCRIPTION

2.1 OVERVIEW

The City and County of Honolulu proposes to develop a one-acre public mini park in the Moiliili area of Honolulu, Oahu, Hawaii. This project is a concept that emerged from the City and County of Honolulu’s “21st Century Oahu – A Shared Vision for the Future” island-wide visioning process. In 1999, Vision Team #10: Makiki, McCully, Moiliili, Manoa (Moiliili/Makiki/Manoa) identified the proposed project as one of the Team’s priority projects, which was then funded in the City’s FY 2000 Capital Improvements Program (CIP) Budget for a total of $1,142,300 to acquire land for the mini park, and $45,000 for planning and design. The project was allocated $50,000 in the FY 2001 CIP budget to construct park improvements.

The proposed passive recreational mini park will be landscaped with shade trees and grass-covered mounds grouped along a meandering concrete walkway that loops through the site, with picnic tables scattered throughout where people can congregate or “talk story”. Drinking fountains and trash receptacles will also be provided on the site. A number of Eucalyptus trees will be planted on a grass mound all along the mauka side of the site to serve as a buffer from the H-1 Freeway.

The park is intended to primarily serve the residents of the relatively high-density apartment buildings in the surrounding area, but would also be enjoyed by the employees of the area’s businesses. The mini park is intended to be a “day-use” park. After the mini park is constructed and opened, it would be possible for the park to be posted with signs and officially closed between the hours of 10:00 pm and 5:00 am. Designating the park as “closed” would require action from the McCully / Moiliili Neighborhood Board and the City’s Parks Board.
The mini park’s proximity to the surrounding apartment complexes and businesses will make it convenient for park users to walk to the site. Pedestrian access to the park will be off Varsity Place, which forms a T-intersection with Kalo Place near the park’s entrance. No on-site parking or comfort station will be provided due to the relatively small size of the site and the park’s passive recreational character. No playground equipment is planned at this time.

2.2 PROJECT DESCRIPTION

The existing parcel is the former location of the GASCO steel natural gas spheres, which were originally installed in 1946 and removed in 1995. The one-acre site is generally cleared and vacant of any permanent improvements. The landowner, Kamehameha Schools, has leased the site to a contractor for use as a staging area for construction equipment and materials associated with nearby construction at the University of Hawaii and the H-1 Freeway. A dust screen has been erected along the Diamond Head and makai sides of the property. Figure 3 shows photographs of the existing site.

The conceptual master plan for the mini park, developed by Lester H. Inouye and Associates, Inc. based on direction and input from members of Vision Team #10: Makiki, McCully, Moliili, Manoa, illustrates a passive recreational park setting (Figure 4). The existing site will require some minor grading before the site is improved. Soil will be imported to create gently rolling mounds along the sides and interior of the site. A meandering sidewalk (designed to meet the Americans with Disabilities Act Accessibility Guidelines) will be constructed to form a loop through the site. Picnic tables are proposed to be located along the loop near the interior of the site where people could gather to play cards or “talk story”. A drinking fountain and trash receptacles will also be provided in the mini park.

The site will be landscaped with grass, and the mounds and edges of the site will be landscaped with a variety of trees proposed to include: Eucalyptus, Monkeypod, Kukui and Royal Poinciana. A 2-inch line irrigation system will be installed to maintain the landscaping. The trees are intended to provide shaded areas for the picnic tables and contribute to the passive recreational nature of the park. A smaller open area is proposed near the center of the mini park, however, it is not intended to be used as a playfield. No playground equipment is proposed at this time, although it could be installed in the future.
Project site - looking in the Ewa direction.

Project site - looking in the Diamond Head direction.

FIGURE 3
EXISTING SITE PHOTOS
KALO PLACE MINI PARK

MAY 2001
The mini park is intended to service area residents and business employees who will walk to the site. No on-site parking will be provided. The mini park will have a single pedestrian entrance off of Varsity Place. A second entrance along the property boundary with the Hawaiian Humane Society and connecting to Kehena Place via an existing pipeline easement was considered, but is not being pursued at this time. If a pedestrian access off of Kehena Place is pursued in the future, it may be necessary to improve the street conditions of Kehena Place, possibly provide on-street parking, and install a sidewalk.

The mini park will have an eight-foot-high-a chain-link fence around its perimeter. The height of the fence will be determined during the design phase. However, the park entrance will not be fenced or gated. Lighting will be provided in the mini-park to illuminate the interior of the park at night. Light fixtures will be baffled so as to avoid glare and light spillage into the surrounding properties.

The Board of Water Supply has indicated that the existing water system is presently adequate to accommodate the proposed mini park. (A copy of the correspondence can be found in Section 10 of this document.) No comfort station will be constructed, thus sewer service is not required. Hawaiian Electric Company will provide electric service for the irrigation system and lighting. On-site drainage facilities will not be constructed, as the project site is approximately ninety percent or more pervious landscaped surfaces. No documentation has been uncovered to indicate that there are any runoff problems associated with the site. There will be no net increase in the volume of storm water leaving the site.

Once construction drawings are completed and the project has gone out to bid and awarded, it is estimated that actual construction of the project would take approximately six (6) to eight (8) months. Based on the current conceptual master plan, the cost to construct and landscape the mini park is estimated to be approximately $405,000.

The project was funded in the City's FY 2000 Capital Improvements Program (CIP) Budget for a total of $1,187,300; $1,142,300 to acquire land and $45,000 for planning and design. A total of $50,000 for construction was funded in the FY 2001 CIP Budget. The City is in the process of acquiring the land from Kamehameha Schools.
SECTION 3
EXISTING PHYSICAL ENVIRONMENT AND RELATED IMPACTS

3.1 GEOGRAPHY AND CLIMATE

The project site is situated on the island of Oahu in the Moiliili area of Honolulu. According to the Atlas of Hawaii, the average monthly rainfall for the Moiliili area is less than 10 inches, and the mean annual temperature is about 75 degrees Fahrenheit.

A. Impacts

Adverse impacts on the climate and geography are not expected.

3.2 SURROUNDING LAND USES AND OWNERSHIP

Land uses adjacent to the property include the H-1 Freeway along the mauka side, the Hawaiian Humane Society along the Ewa-east (Koko Head) side, and commercial (multiple small businesses fronting King Street) and residential apartment developments along the Diamond Head and makai sides of the project site.

There are five multi-story apartment buildings along Varsity Place and Kalo Place, which are mauka of the H-1 Freeway; and an even greater number of apartment buildings along Varsity Circle and Kolo Place, which are makai of the H-1 Freeway. Near the entrance to the project site where Varsity Place and Kalo Place form a T-intersection, Kalo Place becomes a tunnel under the H-1 Freeway that connects the two apartment housing areas. The University of Hawaii (UH) campus is adjacent to the mauka side of the Varsity Circle housing area. The tunnel can be used as a “short cut” to the Lower Campus area.

On the Hawaiian Humane Society property there is a 10-foot wide “right-of-way easement for a pipeline” that connects the project site’s southeast corner to Kehena Place. The
easement, according to GASCO, contains an abandoned natural gas pipeline that at one time was used to link the steel spheres that contained natural gas (formally located on the project site) to GASCO’s natural gas distribution system. A second access to the mini park via Kehena Place using the easement had been considered earlier, but is not being pursued at this time. It may require the improvement of Kehena Place, such as possibly widening the street, providing on-street parking, and a sidewalk.

A. Impacts

The development of a mini park at this location is not expected to have an adverse impact on surrounding land uses or ownership. The existing adjacent land uses will not change as a result of the development of the mini park.

3.3 SOILS AND TOPOGRAPHY

Information on the soils at the project site was taken from the book entitled, Soil Survey of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii, August 1972. The site is comprised of two soil types:

EmA Ewa Silty Clay Loam, 0 to 3 percent slopes, are well-drained soils in basins and on alluvial fans. These soils developed in alluvium derived from basic igneous rock. Runoff is very slow and the erosion hazard is no more than slight. The Ewa-half of the project site contains EmA soils.

M1A Makiki Stony Clay Loam, 0 to 2 percent slopes, are well-drained soils on smooth fans and terraces. These soils formed in alluvium mixed with volcanic ash and cinders. Permeability is moderately rapid, runoff is slow, and the erosion hazard is no more than slight. The Diamond Head-half of the project site contains M1A soils.
A topographic survey was performed for the site, which is relatively flat. The Diamond Head-edge of the site - adjacent to the Hawaiian Humane Society - contains a portion of a relatively steep cliff face. Development of the mini park will extend to the base of this cliff, but will not impact the cliff. During construction, the property will require some minor grading and soil will be imported to provide sufficient material to create the landscaped areas and mounds.

A. Impacts

No adverse impacts resulting from grading or soil conditions are expected.

3.4 NOISE

During construction short-term noise will be generated from construction activities and equipment. However, these impacts will be mitigated through the establishment of start and curfew times in accordance with the State Department of Health regulations and use of mufflers on construction equipment. Once construction is completed, no long-term adverse noise impacts are expected. The mini park is intended to be a "day use" park.

Y. Ebisu & Associates conducted a noise study for the project site that assessed potential noise impacts associated with the proposed development of the Kalo Place Mini Park. The risks that were evaluated included possible noise impacts on park users due to traffic noise from H-1 Freeway, and risks of possible noise impacts on park neighborhoods from activities in the park. Noise mitigation measures were recommended as appropriate. A complete copy of the noise study is contained in Appendix A. A summary of the report follows.

The noise study assessed the existing and future noise environment at the project site. The existing background ambient noise levels were measured at four locations at the project site on November 8, 2000. Noise sources that were evaluated at the project site included traffic noise from H-1 Freeway; outdoor mechanical equipment such as roof top condensers at the adjacent businesses; outdoor yard maintenance equipment, such as lawnmowers, weedwackers, etc.; and construction equipment. Predictions were made about potential noise emissions associated with
the mini park activities, and potential noise impacts during construction were also evaluated and recommendations for minimizing these noise impacts were provided as required.

**Traffic Noise from H-1 Freeway.** Existing traffic noise levels at the park site were in the “Marginally Compatible” and “Acceptable” noise categories for “Neighborhood Park” use based on federal noise standards and acceptability criteria for various land uses. This determination applies only to ground-level noise receptors on the proposed park site, which is partially shielded from the freeway traffic due to the ground-level elevation. Although traffic noise may increase in the future, the increases in traffic noise levels should not place the project site in the “Incompatible” or “Unacceptable” noise categories for “Neighborhood Park” use.

**Noise Sources within Kalo Place Mini Park.** The loudest noise sources within Kalo Place Mini Park are anticipated to be lawn and park maintenance equipment. Although this equipment may be intermittently audible above the existing background ambient noise levels, they are not uncommon in urban areas, are used during the daytime hours, frequency of use is low, and should not cause severe noise impacts. Normal voice communication should be possible at talk-to-listener distances of approximately 10 feet. Shouting or other boisterous activities by park users is not expected. The park is intended to be a passive recreational area - not used for active recreational purposes. The noise environment in the Kalo Place Mini Park environs should continue to be dominated by traffic noise from H-1 Freeway and mechanical equipment noise from neighboring buildings.

**Construction Noise.** Unavoidable, but temporary, noise impacts may occur during the construction period. Because noise from construction activities is predicted to be audible at adjacent properties, the quality of the acoustic environment may be degraded to unacceptable levels during periods of construction.
A. Impacts

Short-term adverse noise impacts will be generated during construction of the project. No long-term adverse noise impacts are expected, either generated on the project site or experienced on-site from adjacent noise sources.

B. Mitigation

H-1 future traffic noise levels at the Kalo Place Mini Park site are not expected to exceed the “Acceptable” level for “Neighborhood Park” use, therefore mitigation of traffic noise from the H-1 Freeway should not be required.

Mitigation measures to reduce construction noise to inaudible levels may not be practical in all cases. Adverse impacts from construction activity will be mitigated through the establishment of start and curfew times in accordance with the applicable State Department of Health’s Administrative Rules, Chapter 11-46, “Community Noise Control”.

3.5 AIR QUALITY

Fugitive dust and air pollution emissions will be generated from construction activities and equipment. Adjacent land uses may be temporarily impacted with poor air quality.

A. Impacts

Short-term impacts on air quality from fugitive dust and air pollution emissions from construction equipment will occur during the construction phase of the project.

B. Mitigation

Performing dust control practices in accordance with the applicable State Department of Health’s Administrative Rules, Title 11, Chapter 60.1, “Air Pollution Control” will mitigate construction-related impacts. Frequent watering of the soil will reduce the amount of fugitive dust emissions that are generated during construction.
3.6 FLORA

The project site is almost entirely cleared and the ground is covered by dirt, some grass and weeds. There are three trees located on the property that are commonly found in urban Honolulu -- a Brassaia, an African Tulip, and a Kiawe -- which will be removed and replaced with 37 new trees at a minimum 15 gallon size. The landscaping plan proposes that the following trees be planted: native plant material of 13 Kukui trees, shade trees of six Monkeypods and four Royal Poinciana, and screening material of 14 Eucalyptus.

A. Impacts

The proposed project will not have an adverse impact on candidate, proposed or listed endangered or threatened plant species. The three existing trees to be removed are commonly found in urban Honolulu. The mini park will contain a number of new trees that will enhance the natural setting of the site. No mitigation measures are proposed.

3.7 FAUNA

The project site, which is currently vacant, is located in a heavily developed and relatively dense area of urban Honolulu. The property is surrounded by buildings on three sides and the H-1 Freeway on the fourth. It is expected that cats, dogs, rats and mice are probably present from time-to-time, but none were seen during site visits.

A. Impacts

No long-term adverse impacts to endangered or threatened species are expected, thus no mitigation measures are proposed.
3.8 ARCHAEOLOGY

The Department of Land and Natural Resources' Historic Preservation Division (HPD) office was contacted during preparation of the Draft Environmental Assessment to obtain any available information regarding previously documented archaeological and/or cultural resources found at the project site or within the immediate vicinity.

The State HPD replied that there are no known sites, nor have any archaeological sites been identified in the area immediately surrounding this parcel, which has been heavily developed in the 1950s and through the 1980s. According to real property information there are a couple of historic structures on nearby properties – a 1948 house and a 1939 office building at the Hawaiian Humane Society. Neither of which are on the State or National Historic Registers. The State HPD does not believe that this project will have an adverse effect on historic sites. A copy of the correspondence can be found in Section 10 of this document.

A. Impacts

Based on consultation with the State Historic Preservation Division, it is anticipated that the proposed project will not have any adverse affects on historic or cultural resources.

B. Mitigation

In the event any archaeological resources are uncovered at the project site, work will stop and the State Historic Preservation Division will be contacted.

3.9 CULTURAL RESOURCES

The Ahupuaa Action Alliance (Mr. Steve Kubota) and the Chair of the Manoa Neighborhood Board (Mr. Tom Heinrich) were contacted to obtain information regarding the area's history, and to assess whether the proposed project may have any impacts on cultural practices or resources. Other resources that were also consulted include, *Sites of Oahu* compiled by Elspeth P. Sterling and Catherine C. Summers, 1978 Bishop Museum Press Honolulu, a series
of articles on the history of Moiliili that appeared in the October 24, 1996 edition of the Star Bulletin, and research papers on the contemporary history of Moiliili composed by graduate students of the University of Hawaii.

According to the Star Bulletin articles, the name Moiliili is rooted in native legends. Originally called Kamoiliili, or place of the lizard pebbles, the legend goes that Hiaka, the sister of the Pele the volcano goddess, was attempting to lure a man back to the Big Island when she was attacked by an evil mo’o — or lizard. Hiaka managed to destroy the mo’o by turning it into pebbles under a tree. According to the article, supposedly that tree is still growing on the grounds of Kuhio School. (Star Bulletin, October 24, 1996)

The Sites of Oahu has a similar account of the basis of the name for the Moiliili area. The following below is taken in its entirety from the aforementioned book:

Hiaka and Wahineome'o were taking Lobiau back with them to Pele in Hawaii. On their way back, they left their canoe at Waikiki and walked up toward Kamoliili. When they arrived at the place where the old stone church now stands, a heavy gust of wind blew, and Wahineome'o and Lobiau felt invisible hands pulling their ears back. They called to Hiaka for help. She knew that it was the lizard god of Kamoliili who did it and told them to keep closely behind her. A short distance away, they met Kamoliili who wanted to fight. She removed her outside skin, which held forks of lightning and snote him with it. His body was cut to pieces and the pieces turned into a low hill in the neighborhood of the old Hawaiian Church. The place is still called Kamoliili to this day. The long, low hill (across from Kuhio School) is said to be the body of this lizard god. (Synopsis)

Hiaka-I’ka-poli-o-Pele
Hoku o Hawaii, April 19 and May 3, 1927
Oahu Place Names

A more contemporary history of Moiliili defines the area as roughly bounded by Isenberg Street, Kapiolani Boulevard down to the Ala Wai, Old Waialae Road and Dole Street. Moiliili was home primarily to Hawaiians and Chinese before the turn of the century. The area contained duck and lotus ponds, rice and taro paddies, and banana and vegetable patches. Moiliili became known as the floral capital of Honolulu stocked by the blooms that grew on farms surrounding the neighborhood. (Star Bulletin, October 24, 1996)
In 1896 the ethnicity of the neighborhood began to change when Kihachi and Shika Kashiwabara moved to Moiliili. Today, they are recognized as the first settlers of Japanese ancestry in Moiliili and founders, in 1902, of the Moiliili Japanese Language School. In the early 1900's more Japanese moved to Moiliili from the plantations and opened small businesses including a tofu factory, teahouse and okazu-ya. (Star Bulletin, October 24, 1996).

Today, more modern social and cultural centers of Moiliili include the Honolulu Japanese Chamber of Commerce, the Japanese Cultural Center of Hawaii, and the Moiliili Community Center. Moiliili's history since the turn of the century is one example of the many ethnic communities within greater Honolulu that has developed in its own unique way.

A. Impacts

The proposed Kalo Place Mini Park project is not anticipated to have any impacts on cultural resources or practices, therefore no mitigative measures are proposed.
SECTION 4
SOCIO-ECONOMIC ENVIRONMENT AND RELATED IMPACTS

4.1 POPULATION CHARACTERISTICS

The estimated population for the State of Hawaii in 1999 was about 1.2 million people, according to the 1999 State Data Book. The island of Oahu in 1995 accounted for approximately 865,000 people, with the Honolulu District having a population of about 370,000 people, which is about 43 percent of the Oahu population.

During the 5-year period of 1990 to 1995, the Honolulu District was the only District on Oahu that saw a loss in population, with a decrease of 2.0 percent compared to an Oahu population increase of 4.1 percent and a State population increase of 6.4 percent. These figures are based on estimates published in the 1999 State Data Book.

A. Impacts

No positive or negative impacts on the population characteristics are expected as a result of the development of the project. However, people will benefit from the provision of a new public mini park situated in a relatively high-density residential and commercial area.

4.2 ECONOMIC CHARACTERISTICS

The civilian labor force for the island of Oahu in 1999 was estimated at approximately 424,250 people with 20,950 unemployed. In 1999, the highest number of jobs was in the Services Industry with 124,000 jobs, followed by Wholesale and Retail Trade with 96,500 jobs. The Agriculture Industry had the lowest job count of 2,200 jobs. The average annual per capita income for the island of Oahu in 1998 was $28,670, which was higher than the State average of $26,759.
A. Impacts

The proposed project will create short-term direct and indirect employment in the design and construction industry, which will have a positive impact on the economy. Adverse impacts on the economy are not expected.

4.3 POTENTIAL SECURITY ISSUES

Potential security issues and concerns have been expressed that the proposed mini park may become a hangout, especially at nighttime, for street people, or illegal activity, etc., because the site's location is difficult to visually monitor from the street. According to Officer Gratz with the District 7 Patrol Office, the University Avenue and Varsity Circle areas do experience a relatively high rate of homeless people sleeping in open areas and going to the bathroom outdoors. Other incidents commonly reported in the area include domestic situations, illegal parking, and auto theft. The Police Department strongly recommends that the park entrance be designed so that the Police Cushman vehicles can easily enter the site.

A. Impacts

A potential impact may be that the homeless people reported in the area may frequent the Kalo Place Mini Park.

B. Mitigation

The mini park will be designed to address potential security concerns. An eight-foot-high chain link fence is proposed around the perimeter of the mini park, not including the park's entrance/ access off of Varsity Place, and interior lighting would be provided so that the mini park would be lighted throughout the night. The entrance will be designed so that Police Cushman vehicles can access the site. The mini park is anticipated to be designated as officially closed at night between the hours of 10:00 pm and 5:00 am. Also, the three-story mixed-used building located along the project's Diamond Head boundary does have second and third floor apartments that look out over the site, which may lend a sense that people are able to observe what takes place at the mini park.
SECTION 5
PUBLIC FACILITIES AND SERVICES AND RELATED IMPACTS

5.1 FLOODING AND DRAINAGE

According to the Flood Insurance Rate Maps of the Federal Emergency Management Agency, the site is within the "Zone X - Areas determined to be outside 500-year flood plain".

A. Impacts

The project will not have a negative impact on existing drainage structures or drainage patterns in the area.

5.2 POTABLE WATER

The City and County of Honolulu Board of Water Supply will provide potable water to the site for landscaping irrigation and drinking fountain use. The irrigation system, using two-inch lines, will be installed throughout the site. The Board of Water Supply has indicated that the existing water system is presently adequate to service the site. The existing 8-inch line along Kalo Place is adequate to meet the demands of the project, which are estimated to be no more than 4,000 gallons per day for irrigation and nominal demand for the drinking fountain to be installed.

A. Impacts

The project will not have a significant demand or negative impacts on water resources in the area, thus no mitigation measures are proposed.
5.3 WASTEWATER TREATMENT AND DISPOSAL

Sewer lines in the vicinity of the project site run along Kalo Place. Kalo Place Mini Park, however, will not have a comfort station.

A. Impacts

No sewer lines or comfort station will be installed and no wastewater will be generated by the project. The drinking fountain’s discharge will be accommodated by construction of a drywell. The project will not have an impact on wastewater facilities.

5.4 TRANSPORTATION

University Avenue, King Street and Beretania Street are the nearest major roadways servicing the area. The project site fronts Varsity Place, which forms a T-intersection with Kalo Place near the park’s entrance. Varsity Place then becomes a tunnel under the H-1 Freeway and turns into Varsity Circle on the mauka side of the Freeway.

A. Impacts

During construction, heavy equipment traveling to and from the site may momentarily impact traffic flow. The Kalo Place Mini Park will not have a parking lot as it is intended to service the immediately surrounding residential and business area. Those wanting to enjoy the park will be able to walk to the site. No long-term impacts on traffic are expected.

5.5 POWER AND COMMUNICATIONS

Electric power to operate the irrigation system and lighting within the mini park will be supplied by Hawaiian Electric Company. No telephone service is required.
A. Impacts

No adverse impacts or demands on existing electrical or communication systems are expected.

5.6 FIRE, POLICE AND EMERGENCY MEDICAL SERVICES

Fire protection service for this area is provided by the McCully Fire Station with backup service from the Waikiki Station. Police service is provided by District 7 (Patrol) Honolulu Office, which stretches between Manoa and Makapuu Point. In a 24-hour period, 2 shifts, with an average of 20 officers per shift, cover the entire district, which has an average of 20 Police officers on two shifts to cover the Moiliili area. Backup service is provided by District 1 (Main Station) or District 6 (Waikiki). Health services may be provided by area hospitals including Queens Medical Center and Kaiser Permanente.

A. Impacts

No adverse impacts on the fire, police or emergency medical facilities are anticipated as a result of this project.
SECTION 6
RELATIONSHIP TO STATE AND COUNTY PLANS,
POLICIES AND CONTROLS

6.1 HAWAII STATE PLAN

The Hawaii State Plan was developed to serve as a guide for future development of the State of Hawaii in areas of population growth, economic benefit, enhancement and preservation of the physical environment, facility systems maintenance and development, and socio-cultural advancement. The Plan identifies, in general, the goals, objectives, policies and priorities for the development and growth of the State.

The proposed project is consistent with the objectives and policies of the Hawaii State Plan. The following describes the relationship and compatibility of the proposed project with the overall plans for the State of Hawaii, as set forth in the Hawaii State Plan.

6.1.1 Population (HRS Section 226-5)

The proposed project will not affect population growth. However, the general public will have the benefit of using the mini park for passive recreational use and open space that will be provided by the City and County of Honolulu.

6.1.2 Economy (HRS Section 226-6 and 10.5)

Design and construction of the proposed project will have a short-term positive benefit through the creation of direct and indirect employment. This short-term employment opportunity will be a positive benefit on the economy.
6.1.3 Physical Environment (HRS Section 226-11, 12, and 13)

Construction of the proposed project will enhance the scenic and natural beauty of the area. The project site is contiguous to the H-1 Freeway and existing residential and commercial development. The project will provide a landscaped open space that will offer visual relief from the surrounding urban environment.

Land, air and water quality resources will not be adversely affected by the proposed project. Short-term air quality impacts may occur during construction. However, these impacts can be mitigated as previously discussed. Over the long-term, the project will not have adverse impacts on air quality and may actually help improve area air quality by providing a landscaped buffer between the H-1 Freeway and the nearby existing developments.

6.1.4 Facility Systems (HRS Section 226-14, 15, 16, 17 and 18)

The developer of the project will work together with the County and Hawaiian Electric Company to provide adequate infrastructure to service the site. Electric service is needed for the irrigation system and interior lighting. Water service is required for the irrigation system and drinking fountain, but no comfort station will be provided therefore sewer service is not necessary.

6.1.5 Socio-Cultural Advancement (HRS Section 226-20, 25 and 26)

Short-term construction activities could have a short-term effect on the health and safety of the public because of noise and air quality impacts. However, mitigation measures will be implemented as previously discussed to reduce impacts from construction noise and air pollution emissions.
6.2 STATE FUNCTIONAL PLANS

The State Functional Plans were formulated to specify in greater detail the policies, guidelines and priorities set forth in the Hawaii State Plan. The thirteen functional plans include Agriculture, Conservation Lands, Education, Energy, Employment, Higher Education, Health, Historic Preservation, Housing, Recreation, Tourism, and Transportation. The following is a description of the proposed project as it relates to the applicable State Functional Plans.

6.2.1 State Agriculture and Conservation Lands Functional Plans

Agricultural and Conservation lands will not be affected by the proposed project.

6.2.2 State Education and Higher Education Functional Plans

The project will not affect education or higher educational goals and objectives.

6.2.3 State Employment Functional Plan

The focus of the Employment Functional Plan is to provide employment training and education to cope with changes in the work force and to prepare people for the working environment. Although this project is not expected to provide these types of services, the development of the project will create direct and indirect employment during the construction phase of the project that could potentially be filled by persons involved in employment programs.

6.2.4 State Energy Functional Plan

The project will not adversely affect the goals and objectives related to energy.
6.2.5 **State Health Functional Plan**

The project will be constructed in accordance with all applicable regulations of the State Department of Health to ensure protection of the environment and public health and safety.

6.2.6 **State Historic Preservation Functional Plan**

The project site has been disturbed by grading in the past. If cultural or historic resources are uncovered during the construction period, work will cease and the State Historic Preservation Division will be notified and consulted regarding the appropriate mitigation measures.

6.2.7 **State Housing Functional Plan**

The project will not affect the housing prices or housing supply in the area.

6.2.8 **State Recreation Functional Plan**

This project satisfies the objective of the Recreation Functional Plan because it will provide a one-acre mini park that will be open to the public. Creation of this park will reduce the demand on existing park facilities in the vicinity of the project.

6.2.9 **State Tourism Functional Plan**

This project will not detract from any tourist attractions or adversely impact any scenic qualities of the area.
6.2.10 State Transportation Functional Plan

The objective of the State Transportation Plan is to provide for the efficient, economical, safe, and convenient movement of people and goods in consonance with the planned growth objectives for the State of Hawaii. The project site is situated so that area residents and business employees will have the convenience of walking to the park for recreation and enjoyment of the open space. No on-site parking is planned, thus no impacts are expected on the transportation system in the vicinity of the project.

6.3 STATE LAND USE

The State Land Use designation for the property is “Urban”. The project is an allowable use within the Urban district.

6.4 PRIMARY URBAN CENTER DEVELOPMENT PLAN

Under the existing Primary Urban Center Development Plan, the land use designation is “Public and Quasi-Public” “Public Facility”, which is consistent with the State Land Use “Urban” designation. The project will not change the Development Plan land use designation. The City and County of Honolulu is currently updating the Primary Urban Center Development Plan. However, preliminary results of this update indicate that the land use designation for the project site will not be changed. Ordinance 99-35 amended in June 1999 the Development Plan’s Public Facilities Map in order to place a “Park” symbol on the project site.

6.5 COUNTY ZONING

The county zoning designation for the project site is R-5 Residential. A “Public Facility” such as a mini park is an allowable use in any zoning district. In the event the property is acquired by the City and developed as a public mini park, according to the Department of Design and Construction, a request to rezone the property to P-2 General Preservation will be made. The City may choose to rezone the property to P-2 General Preservation.
SECTION 7
PERMITS REQUIRED

The following is a list of permits or approvals that will be required for construction of the mini park.

7.1 FEDERAL PERMITS

No Federal permits will be required.

7.2 STATE PERMITS

No State permits are required, however, the Department of Health’s rules regarding fugitive dust control must be followed.

7.3 COUNTY PERMITS

The following City and County of Honolulu permits will be required:

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<th>Permit</th>
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<tr>
<td>Grading Permit</td>
<td>Department of Planning and Permitting</td>
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<td>Building Permit</td>
<td>Department of Planning and Permitting</td>
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SECTION 8
ALTERNATIVES TO THE PROPOSED ACTION

8.1 NO ACTION ALTERNATIVE

The "No Action" alternative would mean that a passive recreational mini park would not be available to the residents of the area's relatively high-density apartment developments and nearby business employees. The nearest City Park to the project site is the Moiliiili Neighborhood Park, fronting Isenberg Street between King and Beretania Streets, which is about one-third of a mile away from the project site. According to the City's Park Standards, the McCully Moiliiili Neighborhood Board area is deficient in the amount of park space that should be available; similarly all of urban Honolulu is deficient in park space.

8.2 ALTERNATIVES CONSIDERED

Three alternatives considered by members of Vision Team #10 and the project landscape architect dealt mainly with different park configurations within the project site. Alternative #1 provided a small area for on-site vehicular parking, which reduced the size of the passive recreational area; Alternative #2 designated an area within the mini park as a "Bark Park" where dog-owners could bring their pets for exercise; and Alternative #3 - the preferred alternative - is the proposed Kalo Place Mini Park project: a passive recreational landscaped mini park with a meandering walkway and picnic tables with no on-site parking.

Another alternative is that if the site is not acquired by the City and developed as a mini park, it is possible that the current landowner – Kamehameha Schools – could develop the site or sell the property to a developer for residential use under its present zoning designation of R-5 Residential. In the recent past, Kamehameha Schools has also expressed an interest in rezoning the property so that it could be developed for office use, possibly in connection with high technology or activities at the University of Hawaii.
SECTION 9
DETERMINATION, FINDINGS AND REASONS FOR
SUPPORTING DETERMINATION

The following is an assessment, based on the thirteen (13) "Significance Criteria" of Title 11, Chapter 200-12 of the Department of Health Administrative Rules, to determine whether or not the project will have a significant impact on the environment.

1) Involves a loss or destruction of any natural or cultural resources;

Development of the project will not involve the loss or destruction of any significant natural or cultural resources in the area. The site has been disturbed and graded in the past and is current vacant, except for the temporary storage of some construction equipment and materials. If cultural resources are uncovered, work will stop and the State Historic Preservation Division will be consulted.

2) Curtails the range of beneficial uses of the environment;

Development of the project will not curtail any beneficial uses of the land. The public mini park planned for the site will provide additional public beneficial use of this site.

3) Conflicts with the State’s long-term goals or guidelines as expressed in Chapter 344, HRS;

The proposed project will not have significant environmental impacts, and therefore does not conflict with the long-term goals or guidelines expressed in Chapter 344, HRS.

4) Substantially affects the economic or social welfare of the community or state;

The project will not have a negative impact on the economy or the social welfare of the community. Construction of the project will result in short-term direct and indirect construction employment, which will have a positive effect on the economy. The
provision of a new public mini park in a relatively high-density urban area will have a positive impact on the social welfare of the community.

5) *Substantially affects public health;*

Short-term noise and air quality impacts may occur during the construction phase of the project. However, these impacts can be adequately mitigated, and the project developed in accordance with applicable State and County laws and regulations so that there will be no adverse impact on public health.

6) *Involves substantial secondary effects, such as population changes or infrastructure demands;*

The project will not have secondary effects on population or infrastructure demands.

7) *Involves a substantial degradation of environmental quality;*

The project will not degrade the quality of the environment. No long-term noxious uses or emissions will result from the project, and no degradation of the environmental quality is expected.

8) *Is individually limited but cumulatively has considerable effect on the environment, or involves a commitment to larger actions;*

The project involves no commitment to any larger action, and will have no cumulative adverse environmental impacts.

9) *Substantially affects a rare, threatened or endangered species or habitat;*

The project site has been disturbed, cleared and graded in the past. No rare, threatened or endangered species or habitat will be impacted by the project.
10) *Detrimentally affects air or water quality or ambient noise levels;*

No long-term air quality, water quality or ambient noise impacts are anticipated from the project. Short-term construction noise and air quality impacts will be mitigated as discussed in earlier sections of this Environmental Assessment.

11) *Affects or is likely to suffer damage by being located in an environmentally sensitive area, such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water or coastal water;*

The project site is not located in an environmentally sensitive area. The site is outside of the tsunami inundation zone and is in a zone outside of the 500-year flood plain as defined by the Federal Management Agency.

12) *Substantially affects scenic vistas and view planes identified in county or state plans or studies;*

The project site is not located in an area that will obstruct scenic vistas and view planes that have been identified in County or State plans or studies. The site lies at a relatively low elevation compared to the higher elevation of the H-1 Freeway immediately adjacent to and mauka of the site.

13) *Require substantial energy consumption;*

The project will not require substantial energy consumption.

Based on the foregoing reasons cited in this Environmental Assessment, a "Finding of No Significant Impact" (FONSI) is anticipated because no significant adverse environmental impacts are expected as a result of the proposed project.
SECTION 10
LIST OF INDIVIDUALS, ORGANIZATIONS AND AGENCIES CONSULTED

10.1 AGENCIES AND ORGANIZATIONS CONSULTED FOR THE DRAFT ENVIRONMENTAL ASSESSMENT

STATE OF HAWAI’I

Department of Health
Office of Environmental Quality Control
Department of Land and Natural Resources
Historic Preservation Division

CITY AND COUNTY OF HONOLULU

Board of Water Supply
Department of Design and Construction
Department of Parks and Recreation
Department of Planning and Permitting
Fire Department
Manoa Neighborhood Board No. 7
McCully / Moiliili Neighborhood Board No. 8
Police Department
Vision Team #10: Makiki, McCully, Moiliili, Manoa — Moiliili & Makiki & Manoa

OTHERS

The Gas Company
Hawaiian Humane Society
Kamehameha Schools
10.2 AGENCIES AND ORGANIZATIONS RECEIVING COPIES OF THE
DRAFT ENVIRONMENTAL ASSESSMENT

STATE OF HAWAII

Department of Education
Department of Health
   Office of Environmental Quality Control
Department of Land and Natural Resources
   Historic Preservation Division
Department of Transportation
Hawaii State Library (Main State-Library)
McCully / Moiliili Public Library

CITY AND COUNTY OF HONOLULU

Board of Water Supply
Councilmember Andy Mirikitani
Department of Design and Construction
Department of Parks and Recreation
Department of Planning and Permitting
Department of Transportation Services
Fire Department
McCully / Moiliili Neighborhood Board
Police Department
Vision Team #10: Makiki, McCully, Moiliili, Manoa, Moiliili / Makiki / Manoa
   Team Facilitator, Peter Radulovic
   Project Champion, David Chun

OTHERS

Hawaiian Humane Society
Kamehameha Schools
Pre-Consultation Correspondence

In preparation of the Draft Environmental Assessment
TOWNSCAPE, INC.
Environmental and Community Planning

January 9, 2001

Mr. Don Hibbard, Administrator
Department of Land and Natural Resources
Historic Preservation Division
Kakuhihewa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

SUBJECT: PROPOSED KALO PLACE MINI PARK
TMK: 2-8-24: parcel 35

Dear Mr. Hibbard:

The City and County of Honolulu is proposing to develop a passive recreational one-acre mini park—"Kalo Place Mini Park"—at TMK: 2-8-24: parcel 35. As part of the Draft Environmental Assessment process, I am writing to request a review by the State Historic Preservation Division as to whether any archaeological or cultural resources have been previously documented in association with this site and the immediately surrounding area.

The project site, which is currently vacant and fronts the intersection of Kalo Place and Varsity Place, is located makai of H-1 Freeway and mauka of the Puck's Alley area near University Avenue and King Street. It is perhaps best known for being the former site of the GASCO gas spheres, which were removed in 1995. The City is in the process of acquiring the property from Kamehameha Schools.

The project architect, Lester H. Inouye and Associates, Inc., proposes to improve the site through landscaped mounds (grass and trees), a meandering sidewalk, picnic tables, and drinking fountains. Minor grading will be required and soil will be imported to the site to create the base for the landscaping and improvements. No excavation work is necessary. The park is intended to be passive in nature—no playfields or play equipment will be present, and no on-site parking will be provided. No comfort station will be constructed.

If you have any questions, please contact me at 536-6999 extension 104. I look forward to your response.

Sincerely,

Mary J. O'Leary
Senior Planner

cc: Mr. Greg Hee, Dept. of Design and Construction
    Mr. Lester Inouye
January 11, 2001

Ms. Mary J. O’Leary, Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O’Leary:

SUBJECT: Proposed Kalo Place Mini Park
TMK: 2-8-024:035, Honolulu, Oahu

There are no known sites in the area immediately surrounding this parcel where the former GASCO gas spheres stood. The area surrounding the proposed site has been heavily developed in the 1950s through the 1980s. There are no archaeological sites identified in the area. According to the real property information, there is a 1948 house located at 2-8-024:041 and the Humane Society located at 2-8-024:037 may have a 1939 office located on its site. We do not have any further information on the properties to determine if they are eligible for listing. Regardless of the property’s eligibility, we do not believe this project will have an adverse effect on historic sites.

Thank you for the opportunity to comment. Should you have further questions, please call Tonia Moy at (808) 692-8030.

Aloha,

[Signature]

DON HIBBARD, Administrator
State Historic Preservation Division

TM:jk
TOWNSCAPE, INC.
Environmental and Community Planning

January 9, 2001

Mr. Cliff Jamile
Manager / Chief Engineer
Board of Water Supply
630 South Beretania Street
Honolulu, HI 96843

SUBJECT: PROPOSED KALO PLACE MINI PARK

Dear Mr. Jamile:

The City and County of Honolulu is proposing to develop a passive recreational one-acre mini park – "Kalo Place Mini Park" – at TMK: 2-8-24: parcel 35. As part of the Draft Environmental Assessment process, I am writing to request a review by the Board of Water Supply of the water demand generated by the proposed project, and to substantiate that sufficient water supply is available to service the proposed project.

The project site, which is currently vacant and fronts the intersection of Kalo Place and Varsity Place, is located makai of H-1 Freeway and mauka of the Puck’s Alley area near University Avenue and King Street. It is perhaps best known for being the former site of the GASCO gas spheres, which were removed in 1995. The City is in the process of acquiring the property from Kamehameha Schools.

The project architect, Lester H. Inouye and Associates, Inc., proposes to improve the site through landscaped mounds (grass and trees), a meandering sidewalk, picnic tables, and drinking fountains. The park is intended to be passive in nature – no playfields or play equipment will be present, and no on-site parking will be provided. No comfort station will be constructed.

According to the project architect, the irrigation water demand should not exceed 4,000 gallons per day. Water demand created by two drinking fountains that are proposed should be nominal.

If you have any questions, please contact me at 536-6999 extension 104. I look forward to your response.

Sincerely,

Mary J. O’Leary
Senior Planner

cc: Mr. Greg Hee, Dept. of Design and Construction
Mr. Lester Inouye
Ms. Mary J. O'Leary  
Senior Planner  
Townscape Inc.  
900 Fort Street Mall, Suite 800  
Honolulu, Hawaii 96813

Dear Ms. O'Leary:

Subject: Your Letter Received on January 11, 2001 Regarding Water Availability for a Proposed Park at Kalo Place. TMK: 2-8-24: 35

Thank you for your letter regarding water service to the proposed Kalo Place Mini Park in Honolulu.

The existing system is presently adequate to accommodate the proposed park.

The availability of water will be confirmed when the building permit application is submitted for our review and approval. When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

If a three-inch or larger meter is required, the construction drawings showing the installation of the meter should be submitted for our review and approval.

If you have any questions, please contact Joe Kaakua at 527-6123.

Very truly yours,

CLIFFORD S. JAMILE  
Manager and Chief Engineer
SECTION 11
COMMENT AND RESPONSE LETTERS ON THE
DRAFT ENVIRONMENTAL ASSESSMENT

The following comment letters were received on the Draft Environmental Assessment for the proposed Kalo Place Mini Park. Out of the total 22 letters received, one (1) individual stated they opposed the mini park project and seven (7) individuals stated they supported the mini park project. Response letters follow each comment letter.

11.1 COMMENT LETTERS RECEIVED FROM AGENCIES AND ORGANIZATIONS WHO RECEIVED THE DRAFT ENVIRONMENTAL ASSESSMENT

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11.2 COMMENT LETTERS RECEIVED FROM OTHER INDIVIDUALS

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<thead>
<tr>
<th>OTHER INDIVIDUALS</th>
<th>COMMENT LETTER</th>
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<tr>
<td>Ms. Nancy Chin</td>
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<td>Ms. Jan Costain</td>
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<tr>
<td>Mr. Thomas Heinrich, Chair of the Manoa</td>
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<td>Neighborhood Board and a leader of Vision Team #10 (Makiki, McCully, Moiliili, Manoa)</td>
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<td>Ms. Janet Inamine</td>
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<td>Mrs. Jane Kanai</td>
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<td>Ms. Muriel Kashiwa</td>
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<td>Bob Tanaka, Inc.</td>
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<td>Senator Brian T. Taniguchi</td>
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<td>Ms. Ruth Tokumoto</td>
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<td>Mr. Alan R. Tyler</td>
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<td>Ms. Lois M. Tyler</td>
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Comment and Response Letters

On the Draft Environmental Assessment
March 27, 2001

Ms. Rae Loui, P.E., Director
Department of Design and Construction
City and County of Honolulu
650 South King Street
Honolulu, Hawai‘i 96813

Dear Ms. Loui:

Having reviewed a final environmental assessment and environmental impact statement preparation notice for the Kalo Place Mini Park, Tax Map Key 2-8-24: 25, Honolulu, O‘ahu, we offer the following comments for your consideration and response.

1. **Native Flora in Landscaping:** Please consider using native plants such as kou (Aleurites moluccana) and ‘ilima (Sida spp.), in your landscaping. Please see our "How to Plant a Native Hawaiian Garden" link at [http://www.state.hi.us/health/oepc/index.html](http://www.state.hi.us/health/oepc/index.html) for more information.

2. **Discussion of Cultural Resources Impacts and Mitigative Measures:** Act 50, Session Laws of Hawai‘i for the year 2000 requires that a project’s impacts to cultural resources or practices be assessed. Please consult with the Ahupua‘a Action Alliance, the neighborhood board and cultural resource practitioners throughout the Mānoa ahupua‘a.

If there are any questions, please call Mr. Leslie Segundo, Environmental Health Specialist, at (808) 586-4185.

Sincerely,

[Signature]

GENEVIEVE SALMONSON
Director

Enclosures

[Signature]

Ms. Mary O’Leary, Townscape, Inc.
GUIDELINES FOR ASSESSING CULTURAL IMPACTS
Adopted by the Environmental Council, State of Hawaii
November 19, 1997

I. INTRODUCTION

It is the policy of the State of Hawaii under Chapter 343, HRS, to alert decision makers, through the environmental assessment process, about significant environmental effects which may result from the implementation of certain actions. An environmental assessment of cultural impacts gathers information about cultural practices and cultural features that may be affected by actions subject to Chapter 343, and promotes responsible decision making. Articles IX and XII of the State Constitution, other state laws, and the courts of the state require government agencies to promote and preserve cultural beliefs, practices, and resources of native Hawaiians and other ethnic groups. Chapter 343 also requires environmental assessment of cultural resources, in determining the significance of a proposed project.

The Environmental Council encourages preparers of environmental assessments and environmental impact statements to analyze the impact of a proposed action on cultural practices and features associated with the project area. The Council provides the following methodology and content protocol as guidance for any assessment of a project that may significantly affect cultural resources.

II. CULTURAL IMPACT ASSESSMENT METHODOLOGY

Cultural impacts differ from other types of impacts assessed in environmental assessments or environmental impact statements. A cultural impact assessment includes information relating to the practices and beliefs of a particular cultural or ethnic group or groups.

Such information may be obtained through scoping, community meetings, ethnographic interviews and oral histories. Information provided by knowledgeable informants, including traditional cultural practitioners, can be applied to the analysis of cultural impacts in conjunction with information concerning cultural practices and features obtained through consultation and from documentary research.

In scoping the cultural portion of an environmental assessment, the geographical extent of the inquiry should, in most instances, be greater than the area over which the proposed action will take place. This is to ensure that cultural practices which may not occur within the boundaries of the project area, but which may nonetheless be affected, are included in the assessment. Thus, for example, a proposed action that may not physically alter gathering practices, but may affect access to gathering areas would be included in the assessment. An ahupua’a is usually the appropriate geographical unit to begin an assessment of cultural impacts of a proposed action, particularly if it includes all of the types of cultural practices associated with the project area. In some cases, cultural practices are likely to extend beyond the ahupua’a and the geographical extent of the study area should take into account those cultural practices.
Guidelines for Accessing Cultural Impacts
November 19, 1997
Page 2 of 4

The historical period studied in a cultural impact assessment should commence with the initial presence in the area of the particular group whose cultural practices and features are being assessed. The types of cultural practices and beliefs subject to assessment may include subsistence, commercial, residential, agricultural, access-related, recreational, and religious and spiritual customs.

The types of cultural resources subject to assessment may include traditional cultural properties or other types of historic sites, both man made and natural, including submerged cultural resources, which support such cultural practices and beliefs.

The Environmental Council recommends that preparers of assessments analyzing cultural impacts adopt the following protocol:

(1) identify and consult with individuals and organizations with expertise concerning the types of cultural resources, practices and beliefs found within the broad geographical area, e.g., district or ahupua'a;

(2) identify and consult with individuals and organizations with knowledge of the area potentially affected by the proposed action;

(3) receive information from or conduct ethnographic interviews and oral histories with persons having knowledge of the potentially affected area;

(4) conduct ethnographic, historical, anthropological, sociological, and other culturally related documentary research;

(5) identify and describe the cultural resources, practices and beliefs located within the potentially affected area; and

(6) assess the impact of the proposed action, alternatives to the proposed action, and mitigation measures, on the cultural resources, practices and beliefs identified.

Interviews and oral histories with knowledgeable individuals may be recorded, if consent is given, and field visits by preparers accompanied by informants are encouraged. Persons interviewed should be afforded an opportunity to review the record of the interview, and consent to publish the record should be obtained whenever possible. For example, the precise location of human burials are likely to be withheld from a cultural impact assessment, but it is important that the document identify the impact a project would have on the burials. At times an informant may provide information only on the condition that it remain in confidence. The wishes of the informant should be respected.
Primary source materials reviewed and analyzed may include, as appropriate: Mahele, land court, census and tax records, including testimonies; vital statistics records; family histories and genealogies; previously published or recorded ethnographic interviews and oral histories; community studies, old maps and photographs; and other archival documents, including correspondence, newspaper or almanac articles, and visitor journals. Secondary source materials such as historical, sociological, and anthropological texts, manuscripts, and similar materials, published and unpublished, should also be consulted. Other materials which should be examined include prior land use proposals, decisions, and rulings which pertain to the study area.

III. CULTURAL IMPACT ASSESSMENT CONTENTS

In addition to the content requirements for environmental assessments and environmental impact statements, which are set out in HAR §§ 11-200-10 and 16 through 18, the portion of the assessment concerning cultural impacts should address, but not necessarily be limited to, the following matters:

1. A discussion of the methods applied and results of consultation with individuals and organizations identified by the preparer as being familiar with cultural practices and features associated with the project area, including any constraints or limitations which might have affected the quality of the information obtained.

2. A description of methods adopted by the preparer to identify, locate, and select the persons interviewed, including a discussion of the level of effort undertaken.

3. Ethnographic and oral history interview procedures, including the circumstances under which the interviews were conducted, and any constraints or limitations which might have affected the quality of the information obtained.

4. Biographical information concerning the individuals and organizations consulted, their particular expertise, and their historical and genealogical relationship to the project area, as well as information concerning the persons submitting information or interviewed, their particular knowledge and cultural expertise, if any, and their historical and genealogical relationship to the project area.

5. A discussion concerning historical and cultural source materials consulted, the institutions and repositories searched, and the level of effort undertaken. This discussion should include, if appropriate, the particular perspective of the authors, any opposing views, and any other relevant constraints, limitations or biases.
Guidelines for Accessing Cultural Impacts
November 19, 1997
Page 4 of 4

6. A discussion concerning the cultural resources, practices and beliefs identified, and, for resources and practices, their location within the broad geographical area in which the proposed action is located, as well as their direct or indirect significance or connection to the project site.

7. A discussion concerning the nature of the cultural practices and beliefs, and the significance of the cultural resources within the project area, affected directly or indirectly by the proposed project.

8. An explanation of confidential information that has been withheld from public disclosure in the assessment.

9. A discussion concerning any conflicting information in regard to identified cultural resources, practices and beliefs.

10. An analysis of the potential effect of any proposed physical alteration on cultural resources, practices or beliefs; the potential of the proposed action to isolate cultural resources, practices or beliefs from their setting; and the potential of the proposed action to introduce elements which may alter the setting in which cultural practices take place.

11. A bibliography of references, and attached records of interviews which were allowed to be disclosed.

The inclusion of this information will help make environmental assessments and environmental impact statements complete and meet the requirements of Chapter 343, HRS. If you have any questions, please call us at 586-4185.
April 23, 2001

Ms. Genevieve Salmonson, Director  
State of Hawaii  
Office of Environmental Quality Control  
236 South Beretania Street, Suite 702  
Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park  
TMK: 2-8-24: parcel 35

Dear Ms. Salmonson:

Thank you for your March 27, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document. The following is in response to the comments in your letter.

1. Please note that the first sentence of your letter refers to "a final environmental assessment and environmental impact statement notice" for the Kalo Place Mini Park. The document filed with OEQC on February 12, 2001 was a Draft Environmental Assessment.

2. Native Flora in Landscaping: The final plant material selection will be determined during the design phase. Consideration will be given to native plant species.

3. Cultural Resources: Townscape, Inc. has contacted Mr. Steve Kubota with the Ahupuaa Action Alliance. The potential impacts of the proposed one acre Kalo Place Mini Park on cultural resources will be addressed in the final Environmental Assessment.

A copy of your comment letter and this response letter will be included in the final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, MCP  
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction  
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
February 23, 2001

Ms. Mary O' Leary
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O'Leary:

SUBJECT: Proposed City & County of Honolulu Kalo Place Mini Park Project
TMK: 2-8-24:35, Honolulu, Oahu

Thank you for the transmittal on the above project. It is highly unlikely that subsurface historic sites will be found since the project is on an empty lot that has been heavily disturbed during installation and removal of the gas spheres. Therefore, we believe the development of a passive recreational mini park at this site will have no effect on historic resources.

Thank you for the opportunity to comment. Should you have further questions, please call Tonia Moy at (808) 692-8030.

Aloha,

DON HIBBARD, Administrator
State Historic Preservation Division

TM:jk
April 6, 2001

Mr. Don Hibbard, Administrator
Department of Land and Natural Resources
Historic Preservation Division
Kahuluiwaa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Hibbard:

Thank you for your February 23, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document.

1. The Historic Preservation Division's statement that development of a passive recreational mini-park at this site will have no effect on historic resources is acknowledged.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
Ms. Mary O'Leary  
AICP, Senior Planner  
Towscape, Inc.  
900 Fort Street Mall, Suite 1160  
Honolulu, Hawaii 96813

Dear Ms. O'Leary:

Subject: Kalo Place Mini Park Project  
Draft Environmental Assessment (DEA)  
TMK: 2-8-24: 035

Thank you for your transmittal requesting our review of the subject project.

The subject project will not impact our State transportation facilities in the area.

We appreciate the opportunity to provide comments.

Very truly yours,

[Signature]

BRIAN MINAAI  
Director of Transportation

c: Mr. Gary Hee, Department of Design and Construction
April 6, 2001

Mr. Brian Minaii
Director
State Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813-5097

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Minaii:

Thank you for your February 26, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document.

1. The statement that the State Department of Transportation has determined that the proposed park project will not impact State transportation facilities in the area is acknowledged.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

[Signature]
Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hce, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 14, 2001

Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Attention: Mary O'Leary

Gentlemen:

Subject: Your Transmittal of February 23, 2001 Regarding the Draft Environmental Assessment for the Kalo Place Mini Park, Moliihi, Oahu, TMK: 2-8-24: 35

Thank you for the opportunity to review the subject document for the proposed park project.

We have the following comments to offer:

1. The existing off-site water system is presently adequate to accommodate the proposed park.

2. The availability of water will be determined when the Building Permit Application is submitted for our review and approval. When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

3. There is an existing 2-inch water meter located at the intersection of Kahena Place and Waialae Avenue near the Hawaiian Humane Society that serves the proposed park site. Our enclosed meter location map indicates that the property piping may be installed within Kahena Place and may traverse through the Humane Society's property. A private utility easement should be obtained if necessary or the developer could consider relocating the water service to Varsity Place.

4. If a three-inch or larger meter is required, the construction drawings showing the installation of the meter should be submitted for our review and approval.
5. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

6. The proposed project is subject to Board of Water Supply cross-connection control requirements prior to the issuance of the building permit application.

If you have any questions, please contact Scot Muraoka at 527-5221.

Very truly yours,

[Signature]

FOR CLIFFORD S. JAMILE
Manager and Chief Engineer

Enclosure

cc: Gary Hee, Department of Design and Construction
April 6, 2001

Mr. Clifford Jamile
Manager and Chief Engineer
Board of Water Supply
City & County of Honolulu
630 South Beretania Street
Honolulu, HI 96843

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Jamile:

Thank you for your March 14, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document. The following is in response to the comments expressed in your letter:

1. It is acknowledged that the existing off-site water system is presently adequate to accommodate the proposed park.

2. The project, should it proceed, will comply with all applicable rules, regulations and requirements of the Board of Water Supply.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
May 10, 2001

Mr. Lester Inouye
Lester H. Inouye & Associates Inc.
FAX 524-4998

Attn: Mary O’Leary

Dear Mr. Inouye:

Thank you for your presentation on May 8, 2001, on Kalo Mini Park.

As stated at the meeting, these are our comments and concerns:

1. The Kukui Nut, Eucalyptus and Royal Poinciana trees are not appropriate trees for any park.

2. The number of Monkeypod trees should be reduced to three.

3. The mounds should be eliminated.

Although not within the scope of your work, I believe that this park would make an ideal dog park, especially with its proximity to the Humane Society.

If you should have any further questions, please contact Mr. Craig S. Mayeda, Administrator, at 527-6333.

Sincerely,

WILLIAM D. BALFOUR, JR.
Director

WDB:ml
May 11, 2001

Mr. William D. Balfour, Jr., Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street, 10th Floor
Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Balfour:

Thank you for your May 10, 2001 comment letter on the subject project. We appreciate your input. The following is in response to your comments:

1. The type of trees to be planted within the mini park, and the configuration of the park’s grounds, will be determined during the design phase.

2. The Vision Team considered various alternative configurations for the park, including making it a “Bark Park”. However, the Vision Team’s preferred alternative was to make it a passive recreational mini park.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 28, 2001

Ms. Mary O’Leary
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O’Leary:

Draft Environmental Assessment
Kalo Place Mini Park - Moiliili
Tax Map Key 2-8-024: 035

The Department of Planning and Permitting appreciates the opportunity to review the Draft Environmental Assessment (EA) for the proposed project. We understand that the improvements will include a concrete pathway, picnic tables, drinking fountain, and lighting. We offer the following comments:

Primary Urban Center Development Plan
The current Development Plan (DP) for the Primary Urban Center sets forth general principles and controls for the McCully-Moiliili area, including the provision of moderate and smaller size open spaces such as mini-parks. The proposed development would serve local recreational needs and enhance the visual quality of Moiliili.

The property is currently DP designated as Public and Quasi-Public.

Land Use and Zoning
The proposed chain-link perimeter fence located in the required yards must not exceed 6 feet in height. Picnic tables and drinking fountains that exceed 30 inches in height must not be located within the required yards.

Since the city is in the process of acquiring the privately-owned parcel, the EA should discuss any impacts and subsequent plans relating to city ownership. Would it be the intent of the city to rezone the property to P-2 preservation district? If the property is rezoned to P-2, waivers may be required for the proposed light poles if they exceed the maximum height limit of 15 feet.
Ms. Mary O'Leary  
Townscape, Inc.  
Page 2  
March 28, 2001

Should you have any questions, please feel free to contact Bonnie Arakawa of our staff at 527-5837.

Sincerely yours,

[Signature]

RANDALL K. FUJIKI, AIA  
Director of Planning and Permitting

RKF:lh  
kalo-dca.bma
April 6, 2001

Mr. Randall K. Fujiki, AIA
Director
Department of Planning and Permitting
650 South King Street
Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Fujiki:

Thank you for your March 28, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document. The following is in response to comments expressed in your letter.

1. The Final EA text in Section 6.4 Primary Urban Center Development Plan will be revised to reflect the project site’s Development Plan designation as Public and Quasi-Public.

2. If the subject property is acquired and the project proceeds, a request to rezone the property to P-2 preservation district will be made.

3. The lighting design will be determined in the design phase. The appropriate permits will be acquired prior to construction.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

[Signature]
Mary J. O’Leary, AIA
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 29, 2001

Ms. Mary O'Leary, AICP
Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O'Leary:

Subject: Kalo Place Mini Park

In response to your February 23, 2001 letter, the draft environmental assessment for the subject project was reviewed. The following comments are the result of this review:

1. The curb and sidewalk fronting the park entrance should be reconstructed and fully improved to close up the curb return area and to provide a continuous improved sidewalk.

2. The pedestrian pathway into and the transition to the park must meet the Americans with Disabilities Act Accessibility Guidelines.

Should you have any questions regarding these comments, please contact Faith Miyamoto of the Transportation Planning Division at 527-6976.

Sincerely,

[Signature]

CHERYL D. SOON
Director

cc: Mr. Gary Hee, Project Manager
Department of Design and Construction
April 6, 2001

Ms. Cheryl D. Soon, Director
Department of Transportation Services
City & County of Honolulu
711 Kapiolani Boulevard, Suite 1200
Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Ms. Soon:

Thank you for your March 29, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document. The following is in response to the comments expressed in your letter.

1. The recommendation regarding improvements to the park's curb and sidewalk is noted and will be addressed in the design phase.

2. The pedestrian pathway into and throughout the mini park will be designed to meet the Americans' with Disabilities Act Accessibility Guidelines.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 14, 2001

Ms. Mary O’Leary, AICP, Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O’Leary:

Subject: Proposed City and County of Honolulu
Kalo Place Mini Park Project
Moiliili, Honolulu, Oahu, Hawaii
At the Intersection of Kalo Place and Varsity Place
Tax Map Key: 2-8-024: 035

We received your letter dated February 23, 2001, regarding the Draft Environmental Assessment for the above-mentioned project. We have reviewed the documents and have no objections to the project.

Should you have any questions, please call Battalion Chief Kenneth Silva of our Fire Prevention Bureau at 831-7778.

Sincerely,

ATTILIO K. LEONARDI
Fire Chief

AKL/KS:jo

cc: Mr. Gary Hee, Project Manager
April 6, 2001

Mr. Attilio K. Leonardi
Fire Chief
Fire Department
City & County of Honolulu
3375 Koapaka Street, Suite H425
Honolulu, HI 96819

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Chief Leonardi:

Thank you for your March 14, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document.

1. The comment that the Fire Department has no objections to the proposed project is acknowledged.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 14, 2001

Ms. Mary O’Leary, AICP
Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O’Leary:

Thank you for the opportunity to review and respond to the Draft Environmental Assessment for the Kalo Place Mini Park.

We would like to clarify the statement on page 24 regarding the police coverage of the Moliiili area. This area is part of District 7 (Patrol), which stretches between Manoa and Makapuu Point. In a 24-hour period, 2 shifts, with an average of 20 officers per shift, cover the entire district.

The proposed project will add to the area that needs to be patrolled by the officers assigned to this district. Therefore, it will have some impact on the services and facilities of this department.

If there are any questions, please call Carol Sodetani of the Support Services Bureau at 529-3658.

Sincerely,

LEE D. DONOHUE
Chief of Police

By

EUGENE UEMURA, Assistant Chief
Support Services Bureau

cc: Gary Hee, DDC
April 6, 2001

Mr. Lee D. Donohue
Chief of Police
Police Department
City & County of Honolulu
801 South Beretania Street
Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Chief Donohue:

Thank you for your March 14, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your review of the document. The following is in response to the comments expressed in your letter:

1. The statements clarifying the Police coverage area will be incorporated into the Final Environmental Assessment.

2. The statement that the proposed project will add to the area patrolled by the officers, and that it will have some impact on the services and facilities of the Police Department is acknowledged.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Lary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
April 5, 2001

Ms. Mary J. O'Leary, Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Dear Ms. O'Leary:

Comments of Draft Environmental Assessment, Kalo Place Proposed Mini Park Project, TMK 128-024-035, Moiliili

Thank you for this opportunity to present Kamehameha Schools' comments on the above-referenced report.

We believe there are some adverse affects to making this site a mini park that may have been overlooked. Please note the following:

A. Social and Economic Impacts

"During construction phase, direct and indirect jobs will be created." Sec. 1.5.2

- The jobs created through the park development are very short term. Perhaps you could consider noting the "other" aspect, that with rezoning and redevelopment, either with a joint venture with UH or through private funding, that not only will there be temporary jobs during construction, but creation of many permanent high-tech jobs as well as career development of our future generations at UH.

B. Public Facilities and Services

"No facilities or permanent structures planned..." Sec. 1.5.3

- This park will be substandard. By this we mean there will be no bathroom facilities. Obviously this will encourage visitors/vagrants desperate in need of facilities to leave their waste on site.

- The alternative would be for people to literally "run" to the nearby commercial buildings to impose on them to use their facilities.

- This park cannot take care of its community, and therefore will burden the nearby commercial community with this task.
C. Public Use

"No playground equipment is planned at this time" Sec. 2.2

- The main reasons the Vision Team proposed this park was for the families with children in the Section 8 housing area under the overpass Mauka. It appears there will be no playground equipment, no baseball fields, and no sandboxes planned. This project does not seem to meet the needs of the community.

D. Crime

"Mini Park intended to be a day-use...officially closed between 10 p.m. and 5 a.m." Sec. 2.1

- This site is enclosed and away from trafficked roads with a "cavernous feel" inviting illegal activities. Existing six-foot high chain link fences topped w/barbwire has not prevented the existing graffiti and drug paraphernalia found by our maintenance crews. Crews at the nearby Stadium Park suffer from having to constantly clean damage from vandalism to their bathrooms and fountains - and that is in a highly trafficked, openly visible area. One can project how much worse crime would be at Kalo Place. We did not see any section in the report on commitment by law enforcement to monitor this park on a regular basis.

- Perhaps we should be consulting with "other" people. A popular excerpt is one about the board of directors of a museum trying to decide which artwork was the most popular. They were planning to spend thousands of dollars hiring consultants to do surveys and studies, when one official suggested to simply ask the janitor which exhibit he had to clean the area in front of the most. This would indicate the highest trafficked artwork and thus the most popular. Instead of requesting information of departments as Section 10 provides, why not ask the maintenance crew of nearby parks or the graffiti cleaning team at the City what they must do each day to maintain existing parks.

"Second...apartments ...may lend a sense that people are able to observe" Sec 4.3.B

- For your information, we have asked the contiguous apartment tenants to contact us as soon as they see whom the people are trafficking drugs and painting graffiti on all of the construction equipment and concrete walls. We have not received a single call from "concerned" residents abutting this site in the five or so years that this site has been vacant. The reality of community assistance is that the "neighbors" don't want to get involved.

E. Parking

"No on-site parking..." Sec. 2.1
• Earlier attempt at any development on this site was met with opposition by surrounding residents who did not want increased parking problems. A park with no parking will only add to this problem.

F. Noise

"H-1 future traffic noise levels...not expected to exceed Acceptable level" Sec. 3.4.B.

• Vehicular pollutants and high decibel H-1 noise from the freeway traffic is aggravating to humans as shown when the Department of Planning and Permitting imposed a requirement on KS' defunct student housing project previously proposed for this very site. Their requirement due to the high decibels they measured was for each unit to be fully enclosed and air-conditioned. What is "acceptable" on paper can be quite different to what is "comfortable" in reality.

G. Health

• There are many feral cats that frequent this area. The community feeds them and leaves the cat food cans throughout. In addition, due to the "hidden" area, people dump everything from old mattresses to tires on this site. Now that this area will have access at all hours since the entrance will not be closed, this means greater access to dumping. Children visiting the park will be exposed to diseases and debris.

H. Traffic

"Those wanting to enjoy will walk" Sec. 5.4.A.

• Condemning a site should be for all public good. Instead, since it is obvious that people from outside of a two block radius will have to drive, then find parking which is not be available, that this park will be only for the use of an extremely small portion of the community; there appears to be a "no outsiders allowed" mentality.

I. Power and Communications

"no telephone service is required" Sec. 5.5

• This is a potential crime area next to Section 8 housing, with no bathroom facilities, and a purported "gathering place" for many people - yet if there is an emergency, one is expected to run several blocks, again to impose on the nearby commercial community, to use their facilities - assuming they are open at the time of the emergency. Shouldn't there be "reasonable" access to call for help in case of emergencies?
J. Physical Environment

"landscaped open space that will offer visual relief from surrounding urban" Sec. 6.1.3

- Six-foot high concrete walls on two sides and the thirty-foot high rock/dirt slopes on other two sides results in a prison-yard atmosphere and makes for an uncomfortable setting for park use.

- Also, traffic driving by above at 60 mph have on occasion, thrown cans of soda and other high-impact projectile objects down onto unsuspecting victims in this "park" area.

K. Alternatives Considered

"possibly in connection with high technology" Sec. 8.2

- This site could be used towards education and research purposes such as to build a private high technology company facility or joint research facility with the nearby University of Hawaii. With the scarcity of potential locations adjacent to the UH campus, this site is ideal for such a future. It would be unfortunate to negate this long-term potential economic opportunity for the community, more jobs, and a better future for our state overall.

In conclusion if the community wants to convert this lot into a park, as owners of the lot who have had to pay thousands of dollars over the years in maintenance, we believe the community has the right to know all the facts and consequences of their decision. We hope our feedback has been insightful and thank you for your time and effort.

If you have any questions please call me at 523-6287.

Sincerely,

[Signature]

Yani/Benedicto
Kamehameha Schools
Asset Manager – East Honolulu

YB:ah
April 23, 2001

Ms. Yumi Benedicto
Asset Manager – East Honolulu
Kamehameha Schools
567 South King Street
Honolulu, HI 96813-3036

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Ms. Benedicto:

Thank you for your April 5, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your input on this project. The following is in response to your comment letter.

1. **Social and Economic Impacts.** The purpose of the Environmental Assessment process is to evaluate the long-term and short-term impacts of the proposed mini park project and to propose appropriate mitigative measures as necessary. References in your letter to possible alternative developments on the site and evaluation of their relative merits or potential impacts are outside of the purpose and scope of this Environmental Assessment. Section 8 of the EA, however, does discuss alternatives considered to the proposed project.

2. **Public Facilities and Services.** A "mini park" is one type of the City's Community-Based Parks group – the other major group is Island-Wide Parks. Community-Based parks are intended to serve the population in the park's immediate vicinity, especially Mini Parks. Mini Parks are typically less than two acres in size and do not contain recreational facilities such as ball fields, play courts, etc. None of the City's twenty-five (25) existing Mini Parks within the Primary Urban Center contain public restrooms.

3. **Public Use.** According to the City's Department of Parks and Recreation, Mini Parks may or may not provide playground equipment. The exclusion of playground equipment at this time for the proposed project is in direct response to the request of Vision Team #10: Makiki, McCully, Moiliili, Manoa. The Draft EA notes that should the community desires' change in the future, that the proposed mini park could incorporate children’s playground equipment.

4. **Crime.** The Draft EA for the proposed project was submitted to the City and County of Honolulu’s Police Department for review and comment. The Department did not raise any concerns regarding the proposed project in their comment letter on the Draft EA. The Department’s letter acknowledged that the project site is within their District 7 Patrol.
Kalo Place Mini Park Draft Environmental Assessment
Letter to Ms. Yumi Benedetto, Kamehameha Schools
April 23, 2001
Page 2

5. Parking. Mini Parks are intended to attract users who reside and work in the immediate vicinity. Only one – Puu O Kaimuki Mini Park - of the City's existing twenty-five (25) Mini Parks provides off-street parking.

6. Noise. The Noise Study for Kalo Park was conducted using ground level receptors because all proposed park activities will take place at ground level. The study concluded that traffic noise levels at the park site currently are in the "Marginally Compatible" and "Acceptable" noise categories for "Neighborhood Park" based on federal noise standards and acceptability criteria for various land uses.

7. Health. No dumping will be allowed on the park site. The City will maintain the proposed mini park.

8. Traffic. All City and County Parks are open to the general public. Due to its relatively smaller size, a Mini Park is intended to attract residents and employees in the immediate vicinity.

9. Power and Communication. It is not the general practice of the City to have payphones provided at Mini Parks. Only two of the existing twenty-five City Mini Parks have payphones.

10. Alternatives Considered. Section 8 of the Draft EA does address alternatives considered to the proposed mini park.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

[Signature]
Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
2716A South King Street
Honolulu, Hawaii 96826
March 23, 2001

Ms. Mary J. O'Leary, AICP
Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

SUBJECT: PROPOSED KALO PLACE MINI PARK

Dear Ms. O'Leary:

The draft environmental assessment document states that the proposed park will have problems of dust and noise, which will be minimized and addressed during the construction period. Dust and noise will be two of the greatest concerns at that period.

However, since “no significant adverse environmental impacts are expected as a result of the proposed project,” the Kimiyo Hirai Trust supports a passive recreational one-acre park at TMM: 2-9-24; parcel 035, Kalo Place.

Moiliili needs more parks where residents can enjoy the beauty of trees and greenery. The mini park will certainly enhance the quality of life of residents within the immediate area.

Sincerely,

Kimiyo Hirai Trust
Owner of TMM:2-9-24; parcel 041

Nancy Chin, Trustee
Kimiyo Hirai Trust

cc: C&C Dept. of Design
& Construction
April 6, 2001

Ms. Nancy Chin, Trustee
Kimiyo Hirai Trust
2716A South King Street
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Ms. Chin:

Thank you for your comment letter received by Townscape, Inc. on March 27, 2001 on the Draft Environmental Assessment for the subject project. We appreciate your input. The following is in response to the comments expressed in your letter:

1. Any construction on the project site will comply with the applicable rules, regulations and requirements related to construction activities.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
2615 Varsity Place 3E  
Honolulu, Hawaii 96826  
March 22, 2001

Townscape, Inc.  
900 Fort Street Mall, Suite 1160  
Honolulu, Hawaii 96813

Attention: Ms. Mary O'Leary, AICP  
Senior Planner

Dear Ms. O'Leary:

A number of area residents, including myself, expressed to the Vision Team the desire for a small mini-park at the Kalo Place property.

I recall the time I had my grandchild with me and did not have a park close by to take her for a walk. Not having a car, I would have had to walk or catch the bus to Stadium Park.

I hope that a passive mini-park will become part of our neighborhood. We really need a place where people can relax outdoors and where children can exert their energy, instead of always staying in our apartments.

Yours truly,

Jan Costain
April 6, 2001

Ms. Jan Costain
2615 Varsity Place – 3E
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMX: 2-8-24: parcel 35

Dear Ms. Costain:

Thank you for your comment letter received on March 26, 2000 regarding the Draft Environmental Assessment (EA) for the subject project. Your input on this project is appreciated.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
TO:            Ms. Mary O'Leary, AICP, Senior Planner
              Townscape, Inc.
              900 Fort Street Mall, Suite 1160
              Honolulu, Hawaii  96813
              Tel  536-6999 x 104
              Fax  524-4998

Mr. Gregory Hee, Project Manager
Department of Design & Construction
City & County of Honolulu
650 South King Street
Honolulu, Hawaii  96813
Tel  527-6977

Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawaii  96813
Tel  586-4185

FROM:          J. Thomas Heinrich JTH
              2426 Armstrong Street
              Honolulu, Hawaii  96822-1932
              Tel  988-3469  Fax  988-6689
              E-mail  jtomheinrich@hotmail.com

DATE:          March 27, 2001  Tuesday

RE:            Kalo Place Mini Park Project
Mo'ili'ili Area of Honolulu, Oahu, Hawaii;
At the intersection of Kalo Place and Varsity Place;
Tax Map Key No. 2-5-24: 035  (1 acre parcel)

Comments on the Draft Environmental Assessment

Aloha, Ms. O'Leary and Mr. Hee:

I offer these comments on the Draft Environmental Assessment concerning the Kalo Place Mini Park Project in my individual capacity, as Chair of the Manoa Neighborhood Board No. 7, and as a leader of Vision Team 10 (Makiki, McCully, Mo'ili'ili, & Manoa).

I strongly support the acquisition of the subject real property by the City & County of Honolulu and the creation of the proposed Kalo Place Mini Park as a passive recreational use park in keeping with Alternative #3 as described in the Draft Environmental Assessment (DEA) at Page 31, Section 8.2: "a passive recreational landscaped mini park with a meandering walkway and picnic tables with no on-site parking."

The Kalo Place Mini Park Project is the result of numerous community discussions and meetings since at least 1998 concerning the need for additional parks and open spaces in the older urban areas, especially in the densely populated core neighborhoods of the Primary Urban Center. The last issued Public Review Draft (1999) of the proposed revisions to the Primary Urban Center Development Plan emphasized the need for additional parks and open spaces throughout Honolulu, and the Vision Statement of Vision Team 10 included this need as a top priority for the Makiki, McCully, Mo'ili'ili, and Manoa areas.

The recently completed Pauoa Park adjacent to the State of Hawaii Department of Agriculture facility and in the block bounded by Keeauemoku Street, South King Street,
Kalakaua Avenue, and Young Street is the first new park and open space resulting in the area specifically from the Vision Team supported capital improvement project priorities.

The Draft Environmental Assessment succinctly summarizes the community's strongly expressed vision for the creation of a passive recreational use park at the site, best remembered as the location for about forty years of two large white natural gas storage "bails" which were demolished about 1995. The area is densely populated and is not served by any immediately accessible park space. (The closest park spaces are Kanewai Park on Dole Street east of Manoa Stream, Old Honolulu Stadium Park at South King Street and Isenberg Street, and the Ala Wai Park along the Ala Wai Canal between McCully Street and Laut Street.)

An earlier proposed 21-story high rise development by the landowner was rejected by the City Council about 1998. In June 1999 the City Council adopted Ordinance 99-35 which amended the Primary Urban Center Development Plan Public Facilities Map by placing a "publicly funded park symbol" on the Kalo Place parcel. The site is presently being used as a baseyard for a nearby construction project.

Vision Team 10, including participants from Makiki, McCully, Mo'ili'ili, and Manoa, expressed a very high priority for additional park and open space in the McCully-Mo'ili'ili area, and specifically included the creation of Kalo Place Park in its first list of priorities for Fiscal Year 2000. Through additional efforts of the City Council, the final appropriation for this project in FY 2000 reportedly totaled $1,190,000. For FY 2001 another $50,000 was appropriated in response to the Vision Team's prioritized request in order to complete the funding for the land acquisition, planning, design, and construction of the passive recreational use park. (The DEA reports a total of $1,187,300 for FY 2000 and $50,000 in FY 2001.)

Now before the City Council is the City Administration's initiative through Resolution No. 01-59, entitled (For Condemnation) Acquisition of Kalo Place Mini Park, to authorize use of eminent domain proceedings to acquire the land from the fee simple owner Kamehameha Schools and accomplish the community vision for the site. The Public Works Committee passed the resolution on second reading on March 20, 2001.

The Manoa Neighborhood Board No. 7 and McCully-Mo'ili'ili Neighborhood Board No. 8 have taken official action to express their strong support for the creation of Kalo Place Mini Park through the acquisition of the property. As a result of the community effort conducted to gather signatures — especially from residents in the block bounded by the H-1 Freeway, Old Waialae Road, South King Street, and University Avenue, and the area of Kalo Place, Kolo Place, and Varsity Circle mauka (north) of the H-1 Freeway — on a petition in support of creating a park at the site and other meetings with the neighbors, the two Neighborhood Boards also chose to formally (through an amendment process before the Neighborhood Commission) change the boundary between them so that the residential area mauka (north) of the H-1 Freeway, historically part of Mo'ili'ili and publicly accessed only via the Kalo Place underpass, is now part of the McCully/Mo'ili'ili Neighborhood Board No. 8 area.
Specific comments on the Draft Environmental Assessment document follow.

1. Page 2, Section 1.4, Line 5 -- the budget figure "$1,423,000" to acquire land should read "$1,423,000" (see Page 8, Section 2.1, Line 6 and Page 12, Section 2.2, Last Paragraph).

2. Page 2, Section 1.4, Last Sentence -- while "no playground equipment is planned at this time", the use pattern that develops will guide the park advocates as to whether to seek funding for playground or fitness station equipment for future installation.

3. Generally, a land use and people activities relationship between the Kalo Place Mini Park and the adjacent Hawaiian Humane Society and its "bark park" for dogs should be evaluated. This statement does not contemplate an expansion of the bark park into the Kalo Place Mini Park area, but recognizes the adjacent proximity, recreational uses being served, and additional available access to the east end of the new park via Kehena Place (makai of the Hawaiian Humane Society facilities). The Hawaiian Humane Society land area is owned by the City & County of Honolulu. The change in topography presents both access challenges and wonderful opportunities for attractive design work to connect the different levels of the hillside. See Page 12, Section 2.2, Paragraph 1 and Page 14, Section 3.2, Lines 3-6.

4. The potential for connecting the Kalo Place Mini Park to proposed bicycle paths accessing the University of Hawaii and the long considered Manoa Stream linear park (to ultimately connect Manoa Falls Trail to the Ala Wai Canal and beyond) should be considered in providing flexibility to the ultimate design. In this manner the Kalo Place Mini Park should be considered in a much larger context than just being a new oasis in a tremendously densely populated and heavily used neighborhood in "Downtown Mo'ili'iili."

5. Page 5, Section 1.5.3, Last Sentence -- clarify that "Police protection will be provided by the [City and County of] Honolulu[s] Police Department, District 7 [office], and fire protection will be provided by the Honolulu Fire Department, McCully Fire Station No. 29."


7. Page 21, Section 4.3 -- Potential Security Issues. At a meeting held at the site in 1999 with Department of Parks & Recreation Director William Balfour, Councilmember Andy Mirikitani, representatives of the Manoa Neighborhood Board No. 7, McCully/Mo'ili'iili Neighborhood Board No. 8, and Vision Team 10, and adjacent landowners, concerns were expressed about then current graffiti activities, homeless persons in the area, the need for chain link fencing, park closure signs (10:00 P.M. to 5:00 A.M.), adequate lighting, and creation of a Neighborhood Security Watch to help care for and maintain the new park. The area residents were to be called upon to "adopt the park" and provide stewardship of it.

8. Page 23, Section 5.5, Line 2 -- "No telephone service is required" but accessibility to a pay telephone in the immediate area should be evaluated and if not reasonably accessible, a pay telephone could be placed near the entrance to the park and near Kalo Place and perhaps the underpass for emergency use.
9. Pages 35 and 36, Sections 10.1 and 10.2 under heading “City and County of Honolulu” –
   (1) please correct the entry “Vision Team #10 – Moiliili/Makiki/Manoa” to read
       “Vision Team 10: Makiki, McCully, Mo’ili‘ili, Manoa”; and
   (2) please add “Manoa Neighborhood Board No. 7”. I personally was consulted
       in the DEA preparation by Ms. O’Leary through telephone interviews.

10. Correct references to “Vision Team #10 [Moiliili/Makiki/Manoa]” to “Vision Team 10
       [Makiki, McCully, Moiliili, Manoa]” at Page 2, Section 1.4, Line 3; Page 8, Section 2.1,
       Line 4; Page 9, Section 2.2, Line 9.

11. As Chair of the Manoa Neighborhood Board No. 7, I also respectfully
    submit this request to receive a copy of the Final Environmental Assessment
    for the Board.

12. Page 35, Section 10.1 under heading “State of Hawaii” – please list the specific
    branches of the Department of Health consulted in the DEA preparation, including
    the Noise & Radiation Branch, Office of Environmental Quality Control, etc.

13. Page 36, Section 10.2 under heading “State of Hawaii” –
    (1) please correct the entry “Main State Library” to read “Hawaii State Library
        (Main Library)”;
    (2) please correct the entry “McCully/Moiliili Library” to read “McCully-
        Mo’ili‘ili Public Library”; and
    (3) please add the Manoa Public Library to receive a copy of the Final
        Environmental Assessment.

14. Page 35, Section 10.1 -- The State of Hawaii Department of Transportation and City &
    County Department of Transportation Services should have been consulted parties in the
    DEA preparation.

The Oahu Metropolitan Planning Organization (OMPO) is presently engaged in the final
preparation of the “Transportation for Oahu Plan (TOP) 2025” which includes proposed
Project No. P-11 for “Interstate H-1 University Avenue Interchange Ramps.” The scope of
this potential project could significantly affect the Kalo Place Mini Park through loss of land
area, increased noise, decreased public safety, etc.

The City’s “Primary Corridor Transportation Project” (including the Bus Rapid Transit (BRT)
alternative) Draft Major Investment Study/Environmental Impact Statement includes
references to possible significant changes to a portion of the H-1 Freeway access system
from the Bingham Street and Wilder Avenue off-ramps at the west end to the South King
Street off-ramps (east- and westbound) and Old Waialae Road on-ramp at the east end.

The Primary Corridor Transportation Project also contemplates a major terminus at the
University of Hawaii campus, whether at Sinclair Circle, the intersection of Metcalf Street
and University Avenue, or in the lower campus area adjacent to Stan Sheriff Arena. (An
appropriate transportation facility symbol was added to the Primary Urban Center
Development Plan Public Facilities Map in the early 1990s for a rapid transit system
terminus at Sheriff Arena. At that time it was proposed to access the lower campus
terminus by constructing a bridge 75 feet above H-1.)
15. Page 35, Section 10.1 – The University of Hawaii should have been a consulted party in the DEA preparation due to its proximity to the proposed Kalo Place Mini Park, the lower campus operations and traffic patterns, and occasional use of the Kalo Place campus gate accessed exclusively through the Kalo Place underpass.

**Conclusion.** In keeping with the expressed community vision for the area, including the creation of additional park and open space when possible, I strongly support the creation of Kalo Place Mini Park as contemplated in the Draft Environmental Assessment. Based on the information provided and the past history of the site, I believe a "Finding of No Significant Impact" (FONSI) for the proposed project is appropriate.

Sincerely,

J. Thomas Heinrich

J. Thomas Heinrich
April 6, 2001

Mr. J. Thomas Heinrich
2426 Armstrong Street
Honolulu, HI 96822-1932

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Heinrich:

Thank you for your March 27, 2001 comment letter regarding the proposed project. Your input on this project is appreciated. The following responses are correlated to the specific enumerated comments expressed in your letter:

#1. The noted correction will be made to the Final Environmental Assessment (EA).

#5. The suggested clarifications will be made to the Final EA.

#6. The suggested clarification will be made to the Final EA.

#8. The project Vision Team requested that no telephone be provided. The determination as to which public amenities, such as a telephone, will be provided will be determined in the design phase.

#9. The noted corrections will be made to the Final EA.

#10. The noted corrections will be made to the Final EA.

#11. As requested, the Manoa Neighborhood Board shall receive a copy of the Final EA.

#12. The suggested clarification will be made to the Final EA.

#13. The suggested clarification will be made to the Final EA.

#14. The State Department of Transportation (DOT) and the City Department of Transportation Services (DTS) were each mailed a copy of the Draft EA to provide them with the opportunity to review and comment on the proposed project.
#15. Although the proposed project is in the vicinity of the University of Hawaii and the mini park may be used by students, the proposed mini park does not impact the University of Hawaii's lower campus operations, traffic patterns, or campus gate.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
717 Hausten Street #202
Honolulu, Hawaii 96826
March 25, 2001

Ms. Mary O’Leary, AICP
Senior Planner
Townscape, Inc.
900 Fort Street Mall, Suite 1180
Honolulu, Hawaii 96813

Re: Kalo Place Mini Park
TMR: 2-8-24:035

Dear Ms. O’Leary:

As a resident of Moiliili and member of the McCully-Moiliili Vision Team, I would like to provide you with a little background on the Kalo Place property.

In 1998, the City Council did not approve Kamehameha Schools/Bishop Estate’s project of a 21-story 290-unit rental apartment at Kalo Place. 550 nearby residents and owners of property signed a petition to oppose the project. Many of them were opposed to any commercial development at Kalo place and suggested a park in that area.

At a vision team meeting, a park at Kalo Place was selected as one of the top projects for the community. One of the goals of the McCully-Moiliili Vision team has been for “more parks, open space, and facilities for recreational purposes for persons of all ages, especially in more densely populated apartment areas.”

In 1999, the vision started to become a reality when the City Council approved Councilmember Andy Mirikitani’s bill to create and fund a park at Kalo Place.

Therefore, this environmental report will be one of the first steps to bring to fruition a mini-park for nearby residents and especially for the approximately 400-plus residents at Varsity Circle, one of the most densely populated areas in Moiliili. The mini-park with its greenery and open space will be a pleasant recreational area for nearby residents; a place where children can run and play and socialize.
Ms. Mary O'Leary
March 25, 2001

However, one concern is that I hope the trees selected do not have sticky seed pods that fall to the ground, preventing people from walking or standing near the trees.

My major concern is that several persons I spoke to who live near the proposed mini-park do not seem to be aware of this environmental report. Since comments are being requested, I am puzzled as to how reasonable input can be received by your firm.

In closing, I would like to state that I am pleased this report has been done and shows minimal negative impact. Also, I would like to state that, as a resident, I support a passive mini-park at Kalo Place.

Sincerely,

Janet Inamine

cc: Dept. of Planning & Design, C & C of Honolulu
April 6, 2001

Ms. Janet Inamine
717 Hausten Street, #202
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 38

Dear Ms. Inamine:

Thank you for your March 25, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. Your input on this project is appreciated. The following is in response to comments expressed in your letter.

1. The final plant and tree selection will be made during the design phase of the project in consultation with the Department of Parks and Recreation. Consideration will be given to native plants.

2. The Draft Environmental Assessment was distributed in accordance with State Department of Health’s Office of Environmental Quality Control’s (OEQC) guidelines to relevant State and City agencies, as well as other community-based organizations such as the McCully Moiliili Neighborhood Board and Vision Team #10: Makiki, McCully, Moiliili, Manoa, the latter of which originally proposed the park project— as well as the McCully Moiliili Public Library.

Also, while it is not required by OEQC, a letter was sent on February 12, 2001 from Townscape, Inc. on behalf of the “Applicant” (City Department of Design and Construction) to the seven property owners - who share a common property line with the project site - notifying them of the proposed project and the availability of the Draft Environmental Assessment.

On Saturday March 10, 2001 the Star Bulletin ran an article about the proposed project and invited the public to send comments to the City Project Manager, Mr. Greg Hee. Interested individuals may also contact the project champion of Vision Team #10, Mr. Ronald Lockwood at 583-5415.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

[Signature]

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 11, 2001
5289 Oio Drive
Honolulu, HI 96821

Department of Design and Construction
650 South King Street
11th Floor
Honolulu, HI 96813

Subject: Proposed Kalo Place Mini Park

Dear Mr. Gregory Hee:

The letter from Townscape, Inc. dated February 12, 2001, on the same subject, gave notification of the City and County of Honolulu’s plan to develop a passive recreational mini park called “Kalo Place Mini Park.” I am writing to express my concerns for the people on my property that may be subjected to unsafe conditions that may result with the development of the park. Specifically I am requesting and respectfully making demands that an appropriate barrier eight feet high be placed between the park and my property. This barrier will help keep any flying objects, accidentally or mischievously initiated, from entering onto my property. Also, the barrier should be high enough to discourage park users from entering onto my premises and disrupt my occupants and visitors from the quiet enjoyment of my property. A four feet fence is unsuitable for this purpose.

Your kind attention to my concerns is very much appreciated. I may be contacted at this phone number: 373-3489.

Sincerely,

Mrs. Jane Kanai

Mrs. Jane Kanai
Property Owner

cc: Mary J. O’Leary, AICP; Senior Planner, Townscape, Inc.
TOWNSCAPE, INC.
Environmental and Community Planning
900 Fort Street Mall, Suite 1160, Honolulu, HI 96813
Telephone (808) 536-6999 Facsimile (808) 524-4998
email address: townscape@lava.net

April 6, 2001

Mrs. Jane Kanai
5289 Oio Drive
Honolulu, HI 96821

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mrs. Kanai:

Thank you for your March 11, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your input on this project. The following is in response to the comments expressed in your letter:

1. During the design phase of the mini park project, the height of the fence will be discussed and coordinated between the Department of Planning & Permitting and the Honolulu Police Department.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
KALO TERRACE  
1054 Kalo Place  
Honolulu, HI 96826  

March 22, 2001  

Townscape, Inc.  
900 Fort Street Mall, Suite 1160  
Honolulu, Hawaii 96813  

Attention: Ms. Mary O’Leary  
AICP Senior Planner  

Re: Environmental Assessment  
Parcel 1(TMKE:2-8024-035)  

Dear Ms. O’Leary:  

Kalo Terrace, located at 1054 Kalo Place, at the corner of Varsity Place and Kalo Place, Honolulu, Hawaii, is a private 96-room graduate students’ dormitory serving students attending the University of Hawaii. It is located at the entrance of the lane leading to the Kalo Place mini park parcel.  

Please be informed that Kalo Terrace heartily endorses a passive mini park which can be enjoyed by the students and residents of the area.  

There are approximately 1,000 persons living in the neighborhood who would greatly appreciate the greenery and quiet of a mini park. Parcel 1 is situated makai and adjacent to the H-1 Freeway and a mini park there will greatly reduce the negative impact of the noise and busy atmosphere created by the H-1 Freeway.  

This environmental report could be the beginning of the creation of a needed mini-park in the area.  

Kalo Terrace  

By Muriel Kashiwa  
Partner-Owner
April 6, 2001

Ms. Muriel Kashiwa
Partner-Owner
Kalo Terrace
1054 Kalo Place
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Ms. Kashiwa:

Thank you for your March 22, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. Your input on this project is appreciated.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
March 19, 2001

Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

Attn: Ms. Mary O’Leary, AICP, Senior Planner

RE: Kalo Place Mini Park

Bob Tanaka, Inc. represents J.H. Onoye & Sons, Inc., owner of the property, as its managing agent for the property located at 1055 Kalo Place, Honolulu, HI 96826; a three-story commercial/residential building that abuts the proposed Kalo Place Mini Park development.

We are in favor and support the development of parks in our communities. Parks, if thoughtfully planned and properly maintained, definitely benefit any community. However, we have some concerns over this development that we anticipate will have a direct impact on our property. The following is an outline of our concerns:

I. SECURITY/SAFETY
   A. Park Access
      1. Main access on Kalo Place. Easily blocked preventing escape if someone is being mugged.
      2. Diamond Head access is at the opposite end of the park and may be inadequate.
      3. Location of the park is in an isolated area.
   B. Trees
      1. The projection of planting trees along the property line between 1055 Kalo Place and the park may serve as a bridge to allow trespassers to climb onto our property’s lower roof and easily access our residential units through jalousie windows.
2. Trees will provide for additional cover for potential illegal activity. The location of this property is already in an isolated location. Trees will make visibility more difficult.

C. Police Patrol/Security Guard
1. Recommend 24-hour roving patrol by HPD.
2. Lock/close off entrances to the park at night between 10:00pm - 5:00am.
3. We have recurring problems with homeless people.

D. Vandalism/Vehicle Theft
1. We currently have a recurring problem with graffiti and auto/moped theft. We anticipate an increase of occurrences.

II. RESTROOM FACILITIES

A. Exclusion of Restrooms
1. We currently have a problem with animal and human excrement on our property and anticipate a magnified problem if restrooms are not provided.

B. Provision of Restrooms
1. Encourage the potential for illegal/sexual activity.
2. Attract homeless people. We have a recurring problem with homeless people sleeping overnight on our property. This may attract and draw more homeless people to the park and onto our property.

III. PARKING

A. Because no on site parking will be provided at the park, we anticipate a problem with park users parking on our property.
Townscape, Inc.
Page 3
March 19, 2001

IV. RECOMMENDED USE

A. Commercial Building; i.e. Storage Facility

B. Open Municipal Parking Lot

Based on the information provided us at this time, we oppose the development of this park. We ask that our concerns be seriously considered before any final decisions are made. Should you have any questions or wish to meet and discuss our concerns, please call our office at 949-4111.

Very truly yours,

BOB TANAKA, INC.

[Signature]

Robert K. Tanaka
President/Principal Broker

cc: J.H. Onoye & Sons, Inc.
City & County of Honolulu, Dept. of Design and Construction;
Attn: Mr. Gary Hee
April 6, 2001

Mr. Robert K. Tanaka
President/Principal Broker
Bob Tanaka, Inc.
1055 Kalo Place, Suite 200
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24; parcel 35

Dear Mr. Tanaka:

Thank you for your March 19, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. Your input on this project is appreciated. The following responses correlate to enumerated comments in your letter.

I.B.1. The type and placement of new trees along the property line between 1055 Kalo Place and the proposed mini park will be evaluated for security concerns during the design phase should the project proceed.

I.C.2. As stated in the Draft EA (page 8), once the mini park is constructed and opened, it would be possible for the park to be posted with signs and officially closed between the hours of 10:00 pm and 5:00 am. Designating the park as “closed” would require action from the McCully Moiliili Neighborhood Board and the City’s Parks Board. The entrance to the park would remain open in order to allow access by the Honolulu Police Department, which has requested that the entrance be designed to accommodate a cashman-type vehicle.

III.A. Regarding parking, the mini park is relatively small at 1 acre in size. The mini park is intended to serve the surrounding neighborhood whose residents can walk to the site.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
The Senate
The Twenty-First Legislature
of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAI'I 96813

March 27, 2001

Ms. Mary O'Leary, AICP, Senior Planner
Townscape, Inc.
9000 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Mr. Greg Hee, Project Manager
Department of Design & Construction
650 S. King Street
Honolulu, Hawaii 96813

Re: Comments on the Draft Environmental Assessment for the
Kalo Place Mini Park Project, Mo'ili'i Area of Honolulu, Oahu; Tax
Map Key No. 2-8-24: 035

Dear Ms. O'Leary and Mr. Hee:

I represent Senatorial District 11 which includes Manoa, McCully,
and Mo'ili'i. I am very aware of the need for additional park and
open space in this densely populated area of the Primary Urban
Center, and support the City & County of Honolulu's initiative
through Resolution No. 01-59, entitled (For Condemnation)
Acquisition of Kalo Place Mini Park, to accomplish the community
vision for the site.

The Draft Environmental Assessment well summarizes the
community's strongly expressed vision for the creation of a passive
recreational use park at the site, best remembered as the location
for about forty years of two large white natural gas storage "balls" which
were demolished about 1995. The area is densely populated and is not served by any immediately accessible park
space. An earlier proposed high rise development by the
landowner was rejected by the City Council about 1998. The site
is presently being used as a bayside for a construction project
nearby.
The Senate
The Twenty-First Legislature
of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAII 96813

The Manoa Neighborhood Board No. 7 and McCully-Mo‘ili‘ili Neighborhood Board No. 8 have taken official action to express their strong support for the creation of Kalo Place Mini Park through the acquisition of the property. As a result of the community effort conducted to gather signatures on a petition in support of creating a park at the site and other meetings with the neighbors, the two Neighborhood Boards also went so far as to formally change the boundary between them so that the residential area mauka (north) of the H-1 Freeway, historically part of Mo‘ili‘ili and publicly accessed only via the Kalo Place underpass, is now part of the McCully/Mo‘ili‘ili NBS area.

Vision Team 10, including participants from Makiki, McCully, Mo‘ili‘ili, and Manoa, expressed a very high priority for additional park and open space in the McCully-Mo‘ili‘ili area, and specifically included the creation of Kalo Place Park in its first list of priorities for Fiscal Year 2000. Through additional efforts of the City Council, the final appropriation for this project in FY 2000 totaled $1,190,000. For FY 2001 another $50,000 was appropriated in response to the Vision Team’s prioritized request in order to complete the funding for the land acquisition, planning, design, and construction of the passive recreational use park.

In keeping with the expressed community vision for the area, including the creation of additional park and open space when possible, I strongly support the creation of Kalo Place Mini Park as contemplated in the Draft Environmental Assessment. I believe a “Finding of No Significant Impact” (FONSI) for the proposed project is appropriate.

Sincerely,

[Signature]
Brian T. Taniguchi
Senatorial District 11
April 6, 2001

Senator Brian Taniguchi
Senatorial District 11
State Capitol
Honolulu, HI 96813

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Senator Taniguchi:

Thank you for your March 27, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. Your input on this project is appreciated.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
1026 Kalo Place 701
Honolulu, Hawaii 96826
March 22, 2001

Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, Hawaii 96813

Attention: Ms. Mary O’Leary, AICP
Senior Planner

Dear Ms. O’Leary:

I am an owner of a condominium at the 7-story University Towers where many senior citizens, like myself, have lived there since the 60’s and 70’s.

This condominium does not have a swimming pool or other recreational facilities. The seniors and other residents of this condominium will be able to take walks at the park and socialize with other residents in this area.

I would like to express my support for a passive mini-park.

Sincerely,

Ruth Tokumoto
April 6, 2001

Ms. Ruth Tokumoto
1026 Kalo Place #701
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Ms. Tokumoto:

Thank you for your comment letter received by Townscape on March 26, 2001 regarding the proposed project. Your input on this project is appreciated.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
1025 Kalo Pl. #1002
Honolulu, HI 96826
March 23, 2001

Ms. Mary O'Leary
Townscape, Inc.
900 Fort Street Mall, Suite 1160
Honolulu, HI 96813

Subject: Mini-Park in Mo'ili'i'i - input for Draft E.A.

1. The Draft E.A. suggests "benches" for the park. Instead, please consider installing cement stools. Why? Because benches invite sleeping and camping, but stools do not. On page 21, the Draft E.A. states that there is "a relatively high rate of homeless people sleeping in open areas and going to the bathroom outdoors" near the proposed park area. Further, it states that the park "may become a hangout - for street people or illegal activity because the site's location is difficult to visualize from the street."

   ALTERNATIVE SUGGESTION: Cement stools (see photos), such as are installed at the nearby Old Stadium Park, provide resting and picnic seats, do not take up much room, and are less subject to vandalism than are benches, and they do not encourage sleeping.

2. The Draft E.A. suggests kukui tree plantings. But kukui trees are hazardous because they drop nuts which are encased in hard green coverings the size of golf balls. These "balls" roll around and get thrown around the park by children. They are then stepped on by the unwary and/or the nearsighted elderly who may slip on them, fall down, and possibly break a hip.

   ALTERNATIVE SUGGESTION: Monkeypod trees (see photos) provide a large canopy of much-needed shade, are beautiful, and are non-hazardous.

Respectfully submitted,

Alan R. Tyler

Enclosures: 4 photos
April 6, 2001

Mr. Alan R. Tyler
1025 Kalo Place, #1002
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Mr. Tyler:

Thank you for your March 23, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. Your input on this project is appreciated.

A copy of your comment letter and this response letter will be included in the Final Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O’Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
    Mr. Lester Inouye, Lester Inouye & Associates, Inc.
Please accept these comments to the Kalo Place Mini Park Draft EA.

1. In general, I agree wholeheartedly that this mini park should be a "PASE" or a "DAY-USE" park, and that NO PLAYGROUND EQUIPMENT is planned at this time.

2. My main concern about this park is noise. I live in an apartment at University Villas, 1025 Kalo Place, on the 16th floor of this 18-story building. There are thirty (30) units, all of them with a lanai facing Diamond Head. At the present time, the noises from the freeway float freely into all our apartments unfiltered. Any noise from the proposed park would also float upward directly into our eighty apartments. Some of the residents need to sleep during the day (firefighters, nurses, and students must study) and so I am concerned about the noise generated by the proposed park. Therefore, I urge you to make this into a truly passive park with no playground equipment and only for day use.

Please note how close University Villas is to the proposed park, with each of the 80 units from the 3rd to the 12th floor opening in the direction of the arrow, which is toward the proposed park.

3. Some further comments:

A. In Section 1.3 Project Location, it is important to include the existence of our building, University Villas, a 18-story, 80-unit apartment building with lanais open to the park.

B. In Section 2.1 Overview, you state "The number of Eucalyptus trees will be planted on a green space along the main side of the site to serve as a buffer from the H-1 Freeway. We would appreciate it if the height of the trees served as a buffer for our 18-story building as well as the park users. Perhaps trees could also be planted on the embankment."

C. In Section 2.2 Project Description (and Sec. 3.6 Flora), you propose Eucalyptus, Monkeypod, Jokini and Royal Poinciana. As you know, the Eucalyptus has very aggressive roots that break up concrete and asphalt. Monkeypod is a very good choice, as seen in the Old Stadium Park.

D. Also, you state that the open area is not intended to be used as a playground. This is good. A playground is incompatible with a passive park. Also, it is good that you state: "No playground equipment is proposed at this time."

E. I would like to see the last part of this sentence which states "Although it could be installed in the future." Again, considering our apartment's openness to the park, all the noise would lower our quality of life.

The state on page 12 that "Light fixtures will be buried so as to avoid glare and light spillage into the surrounding properties." I don't know what baffles are, but please consider the effect of the lights you do install on our apartment residents.

F. In Section 3.3 Soils and Topography, Soil classification is given, but I wonder: Are the soil tests actually examined to see if there is any non-vegetational residue, considering the previous use of this area?

G. In Section 3.4 Noise, it is suggested that no weedwackers or leaf blowers be used because of the high level of noise.

H. In Noise Study for Kalo Park, on page 1, it states that traffic noise levels at the park site are "in the Marginally Compatible" and "Acceptable" noise categories but that "White Determination Applies to Ground Level Receptor on the Park Site, which are partially shielded from the freeway traffic." (Emphasis added.) Yes. The noise levels are much higher from our apartments already, and this was not considered.

As stated on page 6: "It should be noted that this determination (of noise levels) applies only to ground level receptor locations within the park site, which is partially shielded from the H-1 Freeway noise by the high embankment up to 200 feet high. No higher elevations above ground levels, traffic noise from the H-1 Freeway will be greater than those measured at locations I through 5 due to the reduction in noise shielding effects from the embankment under the freeway." (Emphasis added.) This refers directly to our building.

On page 13, under Park Noise Sources, you state: "Gasoline powered lawn maintenance equipment, such as lawn mowers, leaf blowers, and weedwackers will probably be the loudest intermittent noise sources..." Please do not allow leaf blowers and weedwackers. They are too noisy.
April 7, 2001

Ms. Lois M. Tyler
1025 Kalo Place, #1002
Honolulu, HI 96826

SUBJECT: Draft Environmental Assessment for the Proposed Kalo Place Mini Park
TMK: 2-8-24: parcel 35

Dear Ms. Tyler:

Thank you for your March 27, 2001 comment letter on the Draft Environmental Assessment (EA) for the subject project. We appreciate your input. The following is in response to comments expressed in your letter.

Paragraph 3.A: While each building is not individually listed, Section 1.4 of the Draft EA does reference the number of relatively high-density apartment buildings in the surrounding area. Section 1.3 specifically discusses the properties that share a property boundary with the project site.

Paragraph 3.B: The type and height of trees to be planted within the mini park will be determined during the design phase. The trees reflected in the Draft EA conceptual plan are suggestions. The project site does not include the highway embankment area; therefore no trees will be planted in the embankment.

Paragraph 3.C: The type of trees to be planted within the mini park will be determined during the design phase. Consideration will be given to native species.

Paragraph 3.C: Whether or not playground equipment will be installed in the future will be determined by the demands of the community.

Paragraph 3.C: The light fixtures planned for the interior of the project site will be “baffled”, which means that the light fixture will have a hood or lamp-shade-type device around the bulb area to avoid glare and light spillage into the surrounding properties.

Paragraph 3.D: Soils testing was not considered at the time of the Environmental Assessment process because the City does not own the property.
Kalo Place Mini Park Draft Environmental Assessment
Letter to Ms. Lois M. Tyler
April 6, 2001
Page 2

Paragraph 3.E: Your concerns about lawn maintenance equipment are noted, however, such
equipment is typically used by the City and County of Honolulu's park
maintenance staff and will be necessary to use to maintain the park. The
equipment will be limited to daytime hours and the frequency of use will be
relatively low.

On page 16 of the Draft Environmental Assessment, Section 3.d Noise states
that "The loudest noise sources within Kalo Place Mini Park are anticipated
to be lawn and park maintenance equipment.", which will be necessary from
time to time. Neither the Draft EA, nor the Noise Study for Kalo Park,
suggests that no weedwacker or leaf blowers be used – it is acknowledged
that, "Although this equipment may be intermittently audible above the
existing background ambient noise levels, they are not uncommon in urban
areas, are used during the daytime hours, frequency of use is relatively low,
and should not cause serve noise impacts."

Paragraph 3.F: The Noise Study for Kalo Park was conducted using ground level receptors
because all proposed park activities will take place at ground level. The
study concluded that traffic noise levels at the park site currently are in the
"Marginally Compatible" and "Acceptable" noise categories for
"Neighborhood Park" based on federal noise standards and acceptability
criteria for various land uses.

A copy of your comment letter and this response letter will be included in the Final
Environmental Assessment. If you have any questions, please contact me at 536-6999.

Sincerely,

Mary J. O'Leary, AICP
Senior Planner

cc: Mr. Greg Hee, City Department of Design and Construction
Mr. Lester Inouye, Lester Inouye & Associates, Inc.
APPENDIX A

NOISE STUDY FOR KALO PLACE MINI PARK
NOISE STUDY
FOR
KALO PARK

OAHU, HAWAII

Prepared for:
TOWNSCAPE, INC.

Prepared by:
Y. EBISU & ASSOCIATES
1126 12th Avenue, Room 305
Honolulu, Hawaii 96816

DECEMBER 2000
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CHAPTER I. SUMMARY

This noise study describes the potential noise impacts associated with the construction of Kalo Park, near Varsity Place in Moiliili, on the Island of Oahu. Risks of possible noise impacts on park users due to traffic noise from H-1 Freeway, and risks of possible noise impacts on park neighbors from activities in the park were evaluated. Noise mitigation measures were recommended as required.

The results of the noise study can be summarized as follows:

- **Traffic Noise from H-1 Freeway.** Existing traffic noise levels at the park site are in the "Marginally Compatible" and "Acceptable" noise categories for "Neighborhood Park" use. This determination applies only to ground level receptors on the park site, which are partially shielded from the freeway traffic. Although traffic noise levels may increase in the future, the increases in traffic noise levels should not place the project site in the "Incompatible" or "Unacceptable" noise categories for "Neighborhood Park" use.

- **Noise Sources within Kalo Park.** The loudest noise sources within Kalo Park are anticipated to be lawn and park maintenance equipment. Normal voice communication should be possible at talker-to-listener distances of approximately 10 feet. Shouting or other boisterous activities by park users is not expected. The noise environment in the Kalo Park environs should continue to be dominated by traffic noise from H-1 Freeway and mechanical equipment noise from neighboring buildings.

- **Construction Noise.** Unavoidable, but temporary, noise impacts may occur during the construction period. Because noise from construction activities are predicted to be audible at adjoining properties, the quality of the acoustic environment may be degraded to unacceptable levels during periods of construction. Mitigation measures to reduce construction noise to inaudible levels may not be practical in all cases. Compliance with DOH noise regulations and applicable construction curfew periods are recommended to minimize construction noise impacts.
CHAPTER II. STUDY OBJECTIVES

The overall objective of this study was to describe the potential noise impacts associated with the planned development of Kalo Park (see Figure 1), and to recommend noise mitigation measures as required. The noise sources evaluated were traffic noise from H-1 Freeway; outdoor mechanical equipment such as roof top condensers at the adjacent businesses; outdoor yard maintenance equipment, such as lawnmowers, weedwackers, etc.; and construction equipment.

The study objectives included the description of the existing and future noise environment at the proposed Kalo Park. Measurements of existing background ambient noise levels and predictions of potential noise emissions associated with the park activities were required. Evaluations of potential noise impacts during construction were also included in the study objectives. Recommendations for minimizing these noise impacts were also to be provided as required.
CHAPTER III. NOISE DESCRIPTORS AND THEIR RELATIONSHIP TO LAND USE COMPATIBILITY

The noise descriptor currently used by federal agencies to assess environmental noise is the Day-Night Average Sound Level (DNL or Ldn). This descriptor incorporates a 24-hour average of instantaneous A-Weighted Sound Levels as read on a standard Sound Level Meter. By definition, the minimum averaging period for the DNL descriptor is 24 hours. Additionally, sound levels which occur during the nighttime hours of 10:00 PM to 7:00 AM are increased by 10 decibels (dB) prior to computing the 24-hour average by the DNL descriptor. A more complete list of noise descriptors is provided in Appendix B to this report.

Table 1, derived from Reference 1, presents current federal noise standards and acceptability criteria for residential land uses. Land use compatibility guidelines for various levels of environmental noise as measured by the DNL descriptor system are shown in Figure 2, which was extracted from Reference 2. As indicated in Figure 2, noise levels below 55 DNL are considered to be "Compatible" for "Neighborhood Parks," and levels above 70 DNL are considered to be "Incompatible" for "Neighborhood Parks." For business or commercial uses, noise levels below 65 DNL are considered to be "Compatible," and those above 75 DNL are considered to be "Incompatible."

For the purposes of determining noise acceptability for funding assistance from federal agencies [Federal Housing Administration/Housing and Urban Development (FHA/HUD) and the Veterans' Administration (VA)], an exterior noise level of 65 DNL or lower is considered to be acceptable for residences. This standard is applied nationally by FHA/HUD (Reference 3). Because of the predominant use of naturally ventilated dwellings on Oahu, and the relatively low exterior-to-interior sound attenuation afforded by these naturally ventilated structures, an exterior noise level of 65 DNL does not eliminate all risks of noise impacts. Because of these factors, and as recommended in Reference 4, a lower level of 55 DNL is considered to be the "Unconditionally Acceptable" (or "Near-Zero Risk") level of exterior noise. However, after considering the cost and feasibility of applying the lower level of 55 DNL, government agencies such as DOD, FHA/HUD, and VA have selected 65 DNL as a more appropriate regulatory standard.

There are no local or federal noise standards for parks. State Department of Health (DOH) community noise rules (Reference 5) apply only to fixed mechanical equipment used in parks (pumps, fans, etc.) and not to personal stereos, lawn maintenance equipment, etc. Noise during construction activities, however, are regulated by Reference 5 under a permit system. In general, compatible noise levels for neighborhood parks are similar to those for residences, and should be less stringent than those for residences when only daytime use of the parks is anticipated. The reason for this determination is that the DNL system incorporates a 10 dB penalty for
<table>
<thead>
<tr>
<th>NOISE EXPOSURE CLASS</th>
<th>DAY–NIGHT SOUND LEVEL</th>
<th>EQUIVALENT SOUND LEVEL</th>
<th>FEDERAL (1) STANDARD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimal Exposure</td>
<td>Not Exceeding 55 DNL</td>
<td>Not Exceeding 55 Leq</td>
<td>Unconditionally Acceptable</td>
</tr>
<tr>
<td>Moderate Exposure</td>
<td>Above 55 DNL</td>
<td>Above 55 Leq</td>
<td>Acceptable(2)</td>
</tr>
<tr>
<td></td>
<td>But Not Above 65 DNL</td>
<td>But Not Above 65 Leq</td>
<td></td>
</tr>
<tr>
<td>Significant Exposure</td>
<td>Above 65 DNL</td>
<td>Above 65 Leq</td>
<td>Normally Unacceptable</td>
</tr>
<tr>
<td></td>
<td>But Not Above 75 DNL</td>
<td>But Not Above 75 Leq</td>
<td></td>
</tr>
<tr>
<td>Severe Exposure</td>
<td>Above 75 DNL</td>
<td>Above 75 Leq</td>
<td>Unacceptable</td>
</tr>
</tbody>
</table>

Notes: (1) Federal Housing Administration, Veterans Administration, Department of Defense, and Department of Transportation.

(2) FHWA uses the Leq instead of the Ldn descriptor. For planning purposes, both are equivalent if: (a) heavy trucks do not exceed 10 percent of total traffic flow in vehicles per 24 hours, and (b) traffic between 10:00 PM and 7:00 AM does not exceed 15 percent of average daily traffic flow in vehicles per 24 hours. The noise mitigation threshold used by FHWA for residences is 67 Leq.
<table>
<thead>
<tr>
<th>LAND USE</th>
<th>ADJUSTED YEARLY DAY-NIGHT AVERAGE SOUND LEVEL (DNL) IN DECIBELS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential - Single Family, Extensive Outdoor Use</td>
<td></td>
</tr>
<tr>
<td>Residential - Multiple Family, Moderate Outdoor Use</td>
<td></td>
</tr>
<tr>
<td>Residential - Multi-Story Limited Outdoor Use</td>
<td></td>
</tr>
<tr>
<td>Hotels, Motels, Transient Lodging</td>
<td></td>
</tr>
<tr>
<td>School Classrooms, Libraries, Religious Facilities</td>
<td></td>
</tr>
<tr>
<td>Hospitals, Clinics, Nursing Homes, Health Related Facilities</td>
<td></td>
</tr>
<tr>
<td>Auditoriums, Concert Halls</td>
<td></td>
</tr>
<tr>
<td>Music Shells</td>
<td></td>
</tr>
<tr>
<td>Sports Arenas, Outdoor Spectator Sports</td>
<td></td>
</tr>
<tr>
<td>Neighborhood Parks</td>
<td></td>
</tr>
<tr>
<td>Playgrounds, Golf courses, Riding Stables, Water Rec., Cemeteries</td>
<td></td>
</tr>
<tr>
<td>Office Buildings, Personal Services, Business and Professional</td>
<td></td>
</tr>
<tr>
<td>Commercial - Retail, Movie Theaters, Restaurants</td>
<td></td>
</tr>
<tr>
<td>Commercial - Wholesale, Some Retail, Ind., Mfg., Utilities</td>
<td></td>
</tr>
<tr>
<td>Livestock Farming, Animal Breeding</td>
<td></td>
</tr>
<tr>
<td>Agriculture (Except Livestock)</td>
<td></td>
</tr>
</tbody>
</table>

![Figure 2](image)

**FIGURE 2**

LAND USE COMPATIBILITY WITH YEARLY AVERAGE DAY-NIGHT AVERAGE SOUND LEVEL (DNL) AT A SITE FOR BUILDINGS AS COMMONLY CONSTRUCTED.  
(Source: American National Standards Institute S12.9-1998/Part 5)
nighttime noise events, which is appropriate for residences, where 24-hour occupancy is the norm. For parks where only daytime use is anticipated, the 10 dB penalty for nighttime noise is not required. For the purposes of this study, noise levels of 70 DNL to 55 DNL were considered to be "Marginally Compatible" for "Neighborhood Parks," with levels of 55 DNL or less being "Compatible."

State DOH noise regulations concerning stationary mechanical equipment are expressed in maximum allowable property line noise limits rather than DNL (see Reference 5). For agricultural or industrial lands, the allowable limits are 70 dBA for daytime and nighttime periods along the property boundaries. The daytime period is defined to be from 7:00 AM to 10:00 PM, and the nighttime period is considered to be the remaining hours by the DOH rules. For properties zoned for apartment, hotel, or business uses, the applicable DOH property line noise limits are 60 and 50 dBA during the daytime and nighttime periods, respectively. For single family residences, public and open spaces, and preservation zoned lands, the daytime and nighttime DOH limits are 55 and 45 dBA, respectively. Although they are not directly comparable to noise criteria expressed in DNL, State DOH noise limits for residential, commercial, and agricultural/industrial lands equate to approximately 55, 60, and 76 DNL, respectively.
CHAPTER IV. EXISTING NOISE ENVIRONMENT

Existing background ambient noise levels were measured at four locations on the proposed Kalo Park site on November 8, 2000 where shown in Figure 1. The results of the noise measurements are shown in Figures 3 through 6, and the measured average noise levels ranged from 56.6 to 62.0 dBA. Traffic noise from H-1 Freeway was the dominant noise source at measurement Locations 1 through 3. At Location 4, the roof top air condensers on a commercial building south of Location 4 were the dominant noise sources. The loudest noise sources recorded were the noisier motor vehicles on the eastbound freeway lanes and an overhead helicopter.

The existing background ambient noise levels on the Kalo Park site range between 59 to 64 DNL, and are in the "Moderate Exposure, Acceptable" category for noise sensitive land uses such as residential development (see Table 1). From Figure 2, existing noise levels are in the "Marginally Compatible" category for "Neighborhood Park" use. Because the existing levels of noise are considered to be acceptable for residential uses, and they should also be acceptable for "Neighborhood Park" use. It should be noted that this determination applies only to ground level receptor locations within the park site, which is partially shielded from H-1 Freeway noise by the high embankment under the freeway. At higher elevations above ground level, traffic noise from H-1 Freeway will be greater than those measured at Locations 1 through 4 due to the reduction in noise shielding effects from the embankment under the freeway.

Normal voice communication was possible on the proposed park site at talker-to-listener distances of at least 10 feet. Shouting or the use of raised voice levels were not required to communicate in the proposed park. This is consistent with the determination that existing background ambient noise levels within the proposed park site are probably acceptable for its intended use.
A-WEIGHTED SOUND LEVELS RECORDED AT LOCATION 1: KALO PARK (11/8/00)

LOCATION1, KALO PARK, 11/8/00

Freeway Traffic

dB
75 70 65 60 55 50 45

01:00:00 PM 01:15:00 PM 01:30:00 PM 01:45:00 PM 01:30:00 PM 01:25:00 PM 01:20:00 PM 01:15:00 PM 01:10:00 PM 01:05:00 PM
FIGURE 4

A-WEIGHTED SOUND LEVELS RECORDED AT LOCATION 2, KALO PARK (11/8/00)

LOCATION 2, KALO PARK, 11/8/00

Freeway Traffic

Steam

DB: 75 70 65 60 55 50

01:00:00 PM 01:15:00 PM 01:30:00 PM 01:45:00 PM 02:00:00 PM 02:15:00 PM 02:30:00 PM 02:45:00 PM 03:00:00 PM

Page 10
A-WEIGHTED SOUND LEVELS RECORDED AT LOCATION 3; KALO PARK (11/8/00)

FIGURE 5
CHAPTER V. DESCRIPTION OF FUTURE NOISE LEVELS

Motor Vehicle Traffic Noise. Future traffic noise from H-1 Freeway is not expected to increase significantly (by more than 3 dB) within the next ten years because it would require a doubling of existing traffic volumes on the freeway to increase existing traffic noise levels by 3 dB. The freeway is at or near capacity, and as future traffic volumes and congestion on the freeway increase, average vehicle speeds will tend to decrease. Traffic noise levels will probably not increase significantly in the future due to the reduction in average vehicle speeds as freeway traffic volumes increase. If traffic volumes on H-1 Freeway increase at an average rate of 5 percent per year over a ten year period, the anticipated increase in traffic noise levels at Kalo Park should not exceed 1.8 dB.

Park Noise Sources. Gasoline powered lawn maintenance equipment, such as lawnmowers, leaf blowers, and weedwackers will probably be the loudest intermittent noise sources associated with the park development. The noise levels of these equipment range between 65 to 75 dBA at 50 feet, but the frequency of use of these maintenance equipment is expected to be low. Although these equipment may be intermittently audible above the existing background ambient noise levels, they are not uncommon in urban areas, are used during the daytime hours, and should not cause severe noise impacts.

Because the intended use of Kalo Park is for passive and not active recreational purposes, noise from park users is not expected to cause adverse noise impacts. In most instances, the voice levels of park users will be masked by freeway traffic noise or the noise from mechanical equipment. At 50 feet distance from a talker, anticipated voice levels are 42 dBA for normal conversation, and 54 dBA for very loud talking. These levels are below those measured at Locations 1 through 4 (see Figures 3 through 6).

Construction Noise. Audible construction noise will be unavoidable during the construction of the proposed Kalo Park. Typical levels of noise during the noisier phases of construction activity are shown in Figure 7. At the upper end of the noise level ranges depicted in Figure 7 are the construction noise levels during the noisier earthwork phase. At the existing apartment units at the northwest end of the park site, where background ambient noise levels are approximately 60 to 65 dBA, construction noise during site preparation and other earthwork activities will be audible and unavoidable. Construction noise levels may intermittently exceed 90 dBA at these existing apartment units due to the relatively short separation distances between these existing apartment units and the potential areas of construction activity on the park site.
ANTICIPATED RANGE OF CONSTRUCTION NOISE LEVELS VS. DISTANCE
CHAPTER VI. POTENTIAL NOISE IMPACTS AND POSSIBLE NOISE MITIGATION MEASURES

Motor Vehicle Traffic Noise. Existing and future traffic noise levels at the Kalo Park site are not expected to exceed 70 DNL, and the park site should remain in the "Marginally Compatible" and "Moderate Exposure, Acceptable" category for "Neighborhood Park" use. For these reasons, mitigation of traffic noise from H-1 Freeway should not be required.

Park Noise Sources. Fixed and continuos machinery are not expected to be located on the park site. The potential new noise sources at the park site include lawn and park maintenance equipment, which are not regulated by the DOH under Reference 5. These noise sources are similar to those used in residential areas on Oahu during daylight hours, and are intermittent noise sources. Adverse noise impacts from these and other noise sources within Kalo Park are not anticipated. A passive park area similar to the proposed Kalo Park exists at the southwest corner of Stadium Park in Moiliili, where picnic tables, grass lawn, and trees adjoin apartment complexes. Special noise mitigation measures in the form of sound walls or special noise barriers have not been necessary at the Stadium Park, and should not be necessary at the proposed Kalo Park.

Construction Noise. Mitigation of construction noise to inaudible levels may not be practical in all cases due to the intensity of construction noise sources (80 to 90+ dB at 50 FT distance), and due to the exterior nature of the work (earth moving, trenching, concrete pouring, hammering, etc.). However, the following noise mitigation measures should be implemented if determined to be feasible:

- The use of properly muffled construction equipment should be required on the job site.

- The Incorporation of State Department of Health construction noise limits and curfew times during the construction phases of this project is another noise mitigation measure which is normally used. Figure 8 depicts the allowed hours of construction under the DOH permit procedures.
APPENDIX A. REFERENCES

(1) "Guidelines for Considering Noise in Land Use Planning and Control;" Federal Interagency Committee on Urban Noise; June 1980.


(4) "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety;" Environmental Protection Agency (EPA 550/9-74-004); March 1974.

(5) "Title 11, Administrative Rules, Chapter 46, Community Noise Control;" Hawaii State Department of Health; September 23, 1996.
APPENDIX B

EXCERPTS FROM EPA'S ACOUSTIC TERMINOLOGY GUIDE

Descriptor Symbol Usage

The recommended symbols for the commonly used acoustic descriptors based on A-weighting are contained in Table I. As most acoustic criteria and standards used by EPA are derived from the A-weighted sound level, almost all descriptor symbol usage guidance is contained in Table I.

Since acoustic nomenclature includes weighting networks other than "A" and measurements other than pressure, an expansion of Table I was developed (Table II). The group adopted the ANSI descriptor-symbol scheme which is structured into three stages. The first stage indicates that the descriptor is a level (i.e., based upon the logarithm of a ratio), the second stage indicates the type of quantity (power, pressure, or sound exposure), and the third stage indicates the weighting network (A, B, C, D, E,...). If no weighting network is specified, "A" weighting is understood. Exceptions are the A-weighted sound level and the A-weighted peak sound level which require that the "A" be specified. For convenience in those situations in which an A-weighted descriptor is being compared to that of another weighting, the alternative column in Table II permits the inclusion of the "A". For example, a report on blast noise might wish to contrast the Ldn with the LAdn.

Although not included in the tables, it is also recommended that "Lpn" and "Lepn" be used as symbols for perceived noise levels and effective perceived noise levels, respectively.

It is recommended that in their initial use within a report, such terms be written in full, rather than abbreviated. An example of preferred usage is as follows:

The A-weighted sound level (LA) was measured before and after the installation of acoustical treatment. The measured LA values were 85 and 75 dB respectively.

Descriptor Nomenclature

With regard to energy averaging over time, the term "average" should be discouraged in favor of the term "equivalent". Hence, Leq is designated the "equivalent sound level". For Ld, Ln, and Ldn, "equivalent" need not be stated since the concept of day, night, or day-night averaging is by definition understood. Therefore, the designations are "day sound level", "night sound level", and "day-night sound level", respectively.

The peak sound level is the logarithmic ratio of peak sound pressure to a reference pressure and not the maximum root mean square pressure. While the latter is the maximum sound pressure level, it is often incorrectly labelled peak. In that sound level meters have "peak" settings, this distinction is most important.

"Background ambient" should be used in lieu of "background", "ambient", "residual", or "indigenous" to describe the level characteristics of the general background noise due to the contribution of many unidentified noise sources near and far.

With regard to units, it is recommended that the unit decibel (abbreviated dB) be used without modification. Hence, Dba, Fdb, and EPNb are not to be used. Examples of this preferred usage are: the Perceived Noise Level (Lpn was found to be 75 dB, Lpn = 75 dB). This decision was based upon the recommendation of the National Bureau of Standards, and the policies of ANSI and the Acoustical Society of America, all of which disallow any modification of dbl except for prefixes indicating its multiples or submultiples (e.g., deci).

Noise Impact

In discussing noise impact, it is recommended that "Level Weighted Population" (LWP) replace "Equivalent Noise Impact" (ENI). The term "Relative Change of Impact" (RCI) shall be used for comparing the relative differences in LWP between two alternatives.

Further, when appropriate, "Noise Impact Index" (NII) and "Population Weighted Loss of Hearing" (PWL) shall be used consistent with CMBB Working Group 69 Report Guidelines for Preparing Environmental Impact Statements (1977).
APPENDIX B (CONTINUED)

TABLE I
A-WEIGHTED RECOMMENDED DESCRIPTOR LIST

<table>
<thead>
<tr>
<th>TERM</th>
<th>SYMBOL</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. A-Weighted Sound Level</td>
<td>$L_A$</td>
</tr>
<tr>
<td>2. A-Weighted Sound Power Level</td>
<td>$L_{WA}$</td>
</tr>
<tr>
<td>3. Maximum A-Weighted Sound Level</td>
<td>$L_{max}$</td>
</tr>
<tr>
<td>4. Peak A-Weighted Sound Level</td>
<td>$L_{Apk}$</td>
</tr>
<tr>
<td>5. Level Exceeded x% of the Time</td>
<td>$L_x$</td>
</tr>
<tr>
<td>6. Equivalent Sound Level</td>
<td>$L_{eq}$</td>
</tr>
<tr>
<td>7. Equivalent Sound Level over Time (T) (1)</td>
<td>$L_{eq(T)}$</td>
</tr>
<tr>
<td>8. Day Sound Level</td>
<td>$L_d$</td>
</tr>
<tr>
<td>9. Night Sound Level</td>
<td>$L_n$</td>
</tr>
<tr>
<td>10. Day–Night Sound Level</td>
<td>$L_{dn}$</td>
</tr>
<tr>
<td>11. Yearly Day–Night Sound Level</td>
<td>$L_{dn(Y)}$</td>
</tr>
<tr>
<td>12. Sound Exposure Level</td>
<td>$L_{SE}$</td>
</tr>
</tbody>
</table>

(1) Unless otherwise specified, time is in hours (e.g., the hourly equivalent level is $L_{eq(1)}$). Time may be specified in non-quantitative terms (e.g., could be specified a $L_{eq(WASH)}$ to mean the washing cycle noise for a washing machine).

SOURCE: EPA ACOUSTIC TERMINOLOGY GUIDE, BNA 8–14–78,
## APPENDIX B (CONTINUED)

### TABLE II

**RECOMMENDED DESCRIPTOR LIST**

<table>
<thead>
<tr>
<th>TERM</th>
<th>A-WEIGHTING</th>
<th>ALTERNATIVE(^{(1)})</th>
<th>OTHER(^{(2)})</th>
<th>UNWEIGHTED</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sound (Pressure)(^{(3)}) Level</td>
<td>(L_A)</td>
<td>(L_{PA})</td>
<td>(L_{PB} L_{PB})</td>
<td>(L_p)</td>
</tr>
<tr>
<td>2. Sound Power Level</td>
<td>(L_{WA})</td>
<td>(L_{WB})</td>
<td>(L_{W})</td>
<td></td>
</tr>
<tr>
<td>3. Max. Sound Level</td>
<td>(L_{max})</td>
<td>(L_{Amax})</td>
<td>(L_{Bmax})</td>
<td>(L_{pmax})</td>
</tr>
<tr>
<td>4. Peak Sound (Pressure) Level</td>
<td>(L_{Apk})</td>
<td>(L_{Bpk})</td>
<td>(L_{pk})</td>
<td></td>
</tr>
<tr>
<td>5. Level Exceeded (x)% of the Time</td>
<td>(L_X)</td>
<td>(L_{Ax})</td>
<td>(L_{Bx})</td>
<td>(L_{px})</td>
</tr>
<tr>
<td>6. Equivalent Sound Level</td>
<td>(L_{eq})</td>
<td>(L_{Aeq})</td>
<td>(L_{Beq})</td>
<td>(L_{peq})</td>
</tr>
<tr>
<td>7. Equivalent Sound Level (4) Over Time(T)</td>
<td>(L_{eq(T)})</td>
<td>(L_{Aeq(T)})</td>
<td>(L_{Beq(T)})</td>
<td>(L_{peq(T)})</td>
</tr>
<tr>
<td>8. Day Sound Level</td>
<td>(L_d)</td>
<td>(L_{Ad})</td>
<td>(L_{Bd})</td>
<td>(L_{pd})</td>
</tr>
<tr>
<td>9. Night Sound Level</td>
<td>(L_n)</td>
<td>(L_{An})</td>
<td>(L_{Bn})</td>
<td>(L_{pn})</td>
</tr>
<tr>
<td>10. Day–Night Sound Level</td>
<td>(L_{dn})</td>
<td>(L_{Adn})</td>
<td>(L_{Bdn})</td>
<td>(L_{pdn})</td>
</tr>
<tr>
<td>11. Yearly Day–Night Sound Level</td>
<td>(L_{dn(Y)})</td>
<td>(L_{Adn(Y)})</td>
<td>(L_{Bdn(Y)})</td>
<td>(L_{pdn(Y)})</td>
</tr>
<tr>
<td>12. Sound Exposure Level</td>
<td>(L_S)</td>
<td>(L_{SA})</td>
<td>(L_{SB})</td>
<td>(L_{Sp})</td>
</tr>
<tr>
<td>13. Energy Average Value Over (Non-Time Domain) Set of Observations</td>
<td>(L_{eq(e)})</td>
<td>(L_{Aeq(e)})</td>
<td>(L_{Beq(e)})</td>
<td>(L_{peq(e)})</td>
</tr>
<tr>
<td>14. Level Exceeded (x)% of the Total Set of (Non-Time Domain) Observations</td>
<td>(L_{X(e)})</td>
<td>(L_{Ax(e)})</td>
<td>(L_{Bx(e)})</td>
<td>(L_{px(e)})</td>
</tr>
<tr>
<td>15. Average (L_X) Value</td>
<td>(L_X)</td>
<td>(L_{Ax})</td>
<td>(L_{Bx})</td>
<td>(L_{px})</td>
</tr>
</tbody>
</table>

(1) "Alternative" symbols may be used to assure clarity or consistency.

(2) Only B-weighing shown. Applies also to C,D,E,.....weighting.

(3) The term "pressure" is used only for the unweighted level.

(4) Unless otherwise specified, time is in hours (e.g., the hourly equivalent level is \(L_{eq(1)}\)). Time may be specified in non-quantitative terms (e.g., could be specified as \(L_{eq(WASH)}\) to mean the washing cycle noise for a washing machine.