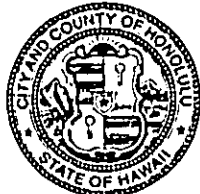


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET • HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4414 • FAX: (808) 527-6743 • INTERNET: www.co.honolulu.hi.us

JEREMY HARRIS
MAYOR



November 18, 2003

RECEIVED

ERIC G. CRISPIN, AIA
DIRECTOR

'03 NOV 20 A9:56

BARBARA KIM STANTON
DEPUTY DIRECTOR

2003/ED-19(pd)

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

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

Dear Ms. Salmonson:

Waikiki Special District, Chapter 343
Environmental Assessment (EA)/Determination
Finding of No Significant Impact


Recorded Owner/	:	
Applicant	:	Honolulu Neighborhood Housing Services, Inc.
Agent	:	Gerald Park Urban Planner
Location	:	352 and 362 Hobron Lane - Waikiki
Tax Map Key	:	2-6-11: 2 and 4
Request	:	Major Waikiki Special District Permit (future application)
Proposal	:	Group Living Facility for the Elderly (Kapiolani Akahi Continuing Care Retirement Community)
Determination	:	A Finding of No Significant Impact is Issued

Attached and incorporated by reference is the Final EA prepared by the applicant for the project. Based on the significance criteria outlined in Title 11, Chapter 200, Hawaii Administrative Rules, we have determined that preparation of an Environmental Impact Statement is not required.

Ms. Genevieve Salmonson, Director
Page 2
November 18, 2003

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the Final EA. Should you have any questions, please contact Pamela Davis of our staff at 523-4807.

Sincerely yours,


ERIC G. CRISPIN, AIA
Director of Planning and Permitting

EGC:nt

Encls.

Doc257094

2003-12-03-0A-*FEA*

DEC 8 2003

FILE COPY

FINAL ENVIRONMENTAL ASSESSMENT

KAPIOLANI AKAHI CCRC

Waikiki, Oahu, Hawaii



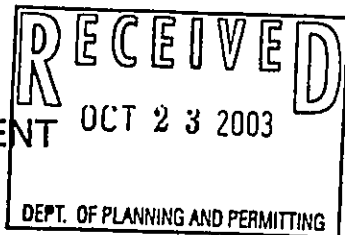
Prepared for

Honolulu Neighborhood Housing Services, Inc.
810 North Vineyard Boulevard, Room 4
Honolulu, Hawaii 96817

October 2003

FINAL ENVIRONMENTAL ASSESSMENT

KAPIOLANI AKAHI CCRC
Waikiki, Oahu, Hawaii



Prepared in Partial Fulfillment of the Requirements
of Chapter 343, Hawaii Revised Statutes and
Title 11, Chapter 200, Hawaii Administrative Rules,
Department of Health, State of Hawaii

Prepared for

Honolulu Neighborhood Housing Services, Inc.
810 North Vineyard Boulevard, Room 4
Honolulu, Hawaii 96817

Prepared by

Gerald Park Urban Planner
1400 Rycroft Street, Suite 876
Honolulu, Hawaii 96814

and

Sam Chang Architects & Associates Inc.
1860 Ala Moana Boulevard
Suite 1000
Honolulu, Hawaii 96815

October 2003

PROJECT PROFILE

Proposed Action: Kapiolani Akahi
Continuing Care Retirement Community (CCRC)

Applicant: Honolulu Neighborhood Housing Services, Inc.
810 North Vineyard Boulevard, Room 4
Honolulu, Hawaii 96817

Approving Agency: Department of Planning and Permitting for
Mayor, City and County of Honolulu

Need for Assessment: Development in Waikiki
Section 11-200-6 (b)(1)(e)
Hawaii Administrative Rules

Tax Map Key: 2-6-011: 02, 04
Parcel Area: 130,181 square feet or 2.9885 acres
Owner: Honolulu Neighborhood Housing Services

Existing Use: Vacant

State Land Use Designation: Urban
Development Plan Area: Primary Urban Center
Development Plan Land Use Map: High Density Residential
Public Facilities Map: No Improvements Programmed for
Hobron Lane and Ala Wai Boulevard

Special District: Waikiki
Zoning: Apartment Precinct
Special Management Area: Outside Special Management Area

Contact Person: Donald H. Graham, Jr.
Graham Murata Russell
345 Queen Street
Suite 400
Honolulu, Hawaii 96813

Telephone: (808) 524-5151

Note: Revisions to the text of the Draft Environmental Assessment are shown in **italic** type. Deleted text is [bracketed].

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DESCRIPTION OF THE PROPOSED PROJECT

Honolulu Neighborhood Housing Services, Inc., a local non-profit organization, proposes to construct a senior congregate living facility in the Hobron area of Waikiki. The facility, to be called the Kapiolani Akahi Continuing Care Retirement Community ("CCRC"), will be constructed on vacant land bounded by Ala Wai Boulevard to the north, Hobron Lane to the south, the Tradewinds Mauka Apartments to the west, and the Moani Apartments to the east. Both apartment developments are detached low-rise, low-density apartment developments.

The project site (or building site) is identified as tax map key 2-6-011: 002 and 004 encompassing an area of 130,181 square feet or 2.9885 acres. A Location Map, Vicinity Map, and Tax Map are shown in Figures 1, 2, and 3 respectively.

A. Purpose and Need for the Project

Few persons would dispute the contention that Hawaii's population is aging. What may be difficult to grasp is the speed at which that aging is occurring and the consequences for the community in the years ahead in coping with an aged population. The 1990 census counted 836,231 persons residing on Oahu. Of this total, approximately 128,490 persons (15.3%) were 60 years and older and 91,832 (11%) were 65 years and older. The Bureau of the Census estimates that in 1997 the Oahu population grew to 869,857 with 144,331 persons (16.6%) 60 years and older and 112,019 (12.9%) 65 years and older (Department of Community Services, 1999). In the year 2000, Oahu had a population of 876,156 and a population of 151,000 (17.2%) aged 60 years and older.

With the aging of the baby boomers (the age cohort born between 1946 and 1964), the percentage of population 60 years and older is projected to increase to 20% by the year 2010 and 25% by the year 2020 (Ibid). With the graying of the population, alternatives are being sought by public and private care providers to provide for the needs of the elderly.

The Four Year Area Plan prepared by the Elderly Affairs Division of the Department of Community Services, City and County of Honolulu (1999) identified five major needs facing the elderly and those that provide them services and care. These are:

- 1) Assuring subsistence needs—adequate income, medical care, housing, and food.
- 2) Providing access to people, places, and services they need to maintain independence and the information they need to make informed choices.
- 3) Providing supportive services for elders whose economic and social conditions make them vulnerable to illness, abuse, isolation, depression, or institutionalization.
- 4) Developing a system to provide adequate home and community based services.
- 5) Reducing ageism and attitudinal barriers towards the elderly.

The Kapiolani Akahi CCRC is proposed to help meet the needs and lifestyle preferences of an elderly population including, the healthy, the health impaired, and their respective families. The organization, circulation, and design of the project are simple, clean, and conducive to the prestige and self-respect due the elderly. It is anticipated that in striving to achieve this objective, the Kapiolani Akahi will make a meaningful contribution in assisting the community to provide services that would help meet the needs of its aging population.

B. Technical Characteristics

1. Podium and Tower

All CCRC residential and health care components will be housed in a 26-story building. The first levels feature a large building footprint that forms the base of the tower or podium. The remaining

levels form the tower. The height of the podium and tower is approximately 294 feet, which is less than the 350-foot maximum height permitted for the zoning precinct. A Site Plan is shown in Figure 4.

The podium Garden Level consists of Activity Rooms, Indoor Swimming Pool and Deck, Exterior Gardens, and Driveway to the parking structure (See Figure 5, L-1 Garden Level). A Loading Dock and spaces for Staff Parking are on this level. Activity rooms include an Exercise Room, Locker Rooms, Trainer's Office, Beauty Shop, and Mini-Storage Rooms. A Security Office with a Fire Control Center is located on this level. The exterior of the Ground Level would be landscaped with walking paths, sitting areas, and outdoor cooking facilities.

The podium Second Level consists of the Lobby, Congregate Dining Facility, Outdoor Deck, Dining Room Kitchen, Sitting Area, Mail Room, Front Office, Lounge Area, Restrooms, and Porte Cochere (See Figure 6, L-2 Lobby Level).

The tower Third Level consists of a 33-bed Skilled Nursing Unit, Nurse's Station, Examination and Therapy Room, Therapy Office, TV & Activity Room, Laundry Rooms, Restrooms, Bathing Rooms, DNS Office, Social Services, a combined Dining Room/Activity Room, and Janitorial and Storage Rooms (See Figure 7, L-3 Skilled Nursing Facility).

The tower Fourth Level houses a 26-bed Alzheimer Unit, Resident/Staff Interaction Center, TV/Music & Memory Room, Dining and Activity Room, Restrooms, Bathing Rooms, Activity Office, Staff Lounge, Multi-Purpose Classroom, Outdoor Recreation Deck, and support rooms. The recreation deck is designed with trellises for shade, perimeter planters, and lattice screening to keep patients within the building perimeter.

The tower Fifth Level houses a 14-bed Assisted Living Unit, Nurse's Station, Dining & Chapel Room/Lounge, Outdoor Dining and Exercise Deck, Restrooms, Bathing Rooms, Library, TV & Activity Room, Beauty Shop, and support rooms.

The Sixth through 25th Levels consist of 122 Independent Living Units. Levels 6 through 13 feature 3 one-bedroom/1 bath and 4 two-bedroom/2 bath units for a total of 7 units per floor (See Figure 8, L-6-13).

Levels 14 through 21 feature 1 one-bedroom/1 bath and 5 two-bedroom/2 bath units for a total of 6 units per floor (See Figure 9, L-14-21).

Levels 22 through 23 feature 1 one-bedroom/one bath and 4 two-bedroom/2 bath units for a total of 5 units per floor. Levels 24 and 25 feature 1 one-bedroom/1 bath and 3 two-bedroom/2 bath units for a total of 4 units per floor.

The one-bedroom units range in size from 580 to 830 square feet in net floor area and the two-bedroom units range between 1,016 square feet to 1,474 square feet. All units will be furnished with a kitchen, washer/dryer, air conditioning, ADA bathroom, and a lanai. In total, 36 one-bedroom and 86 two-bedroom units are planned.

A Party Room and Administrative Offices will be located on the penthouse level (See Figure 10-L-26, Party Room and Roof Plan). The Party Room may also function as a library and for chapel services.

2. Building Height and Setback

The 26-story Kapiolani Akahi will not exceed the 350-foot height limit established for the zoning district. As designed, the podium and tower are approximately 294 feet in height.

The podium (and all structural improvements) will be set back from all property lines as required by the development standards of the Waikiki Special District (15 feet for the front yard and 10 feet from the side and rear yards). Because of the height of the Akahi, all tower levels above 40-feet in height

have been "set back" an additional 26 feet per requirement of the Waikiki Special District, Land Use Ordinance (§21-9.80-5(c)(2)).

Exterior elevations are shown in Figures 11 through 14.

3. Open Space and Landscaping

Approximately 54% of the total land area (70,779 square feet) is devoted to open space that will be landscaped. The selection of plant materials and their arrangement will add form, color, and texture to the project thus improving the aesthetics of the site and helping to create a "Hawaiian sense of place." Landscaping will also help to "soften" the building mass and conceal ground level views of back of house functions. Drought-tolerant plants will be used to reduce water consumption. A koi pond may be constructed as a landscaping adjunct and water feature.

Landscaping plantings and sidewalk improvements along Ala Wai Boulevard will help to accent the Ala Wai Canal Promenade and add interest along this visible frontage.

In compliance with the requirements of the City's Park Dedication Ordinance, Applicant has elected to set aside land for a private park. Based on a formula used by the City and County of Honolulu (which requires 110 square feet of park space per the number of beds including nursing beds in the project), the land area required for parks and playgrounds is 32,450 square feet. Approximately 32,500 square feet will be provided. The private park will be designed to blend with the areas set aside for open space to create a unified landscape.

4. Parking and Access

Vehicle access and egress is proposed at two locations. The main driveway will be from Hobron Lane opposite its intersection with Kaiou Drive. From this driveway, vehicles can either directly enter the parking structure or access the porte cochere on Level 2 and the parking structure via a ramped driveway. A second driveway from Ala Wai Boulevard will accommodate resident, staff, service, and group vehicles (e.g. vans, Handi-van).

Off-street parking for 155 vehicles will be accommodated on-site. Approximately 148 vehicles and 10 handicapped stalls will be provided in a 2½ story parking structure located to the southwest of the tower. The parking structure is approximately 24-feet in height.

Employee parking will be made available inside the parking structure. In addition, seven at-grade stalls off the service driveway are set aside for staff parking. Parking needs are summarized as follows:

	<u>No. of Vehicles</u>
Residents	99
Health Care Patients	0
Employees	43
Guests and Visitors	8
Outside Vendors	<u>5</u>
Total	155

More on-site visitor parking stalls will be allocated if possible or alternative guest parking measures will be implemented as the need arises. Such measures may include limiting guest parking to a certain amount of time, tandem parking, attendant parking, and sharing parking stalls set aside for administrators and employees (Response to Honolulu Police Department Comment).

Five at-grade loading stalls are proposed. The loading stalls will access a loading dock on the Garden Level from Ala Wai Boulevard. All service vehicle maneuvering will occur on-site.

5. Amenities

One of the goals of the Kapiolani Akahi is to provide accommodations and amenities for its residents, their families, and guests. Towards this end, indoor and outdoor facilities are planned for active and passive pursuits. Outdoor recreation areas include a lawn area for exercise and unstructured outdoor activities and landscaped open space for strolling, sitting, and quiet enjoyment. Indoor facilities and services will include:

Congregate Dining Room	The Main dining room for residents and their guests. Three meals provided per day. One main prepared meal per day is provided in the monthly service fee. Meals cooked to order or available buffet style.
Nursing/Assisted Living/ Alzheimer Dining Rooms	Three small dining rooms for health care patients. Meals to be prepared from a central kitchen serving all dining rooms. These rooms can also function as activity rooms.
Indoor Pool	A pool for lap swimming, water exercise, and therapy.
Fitness Center	A place for exercise classes and therapies like massage. The Center will also be set up with exercise equipment specifically designed for use by seniors.
Beauty Shop (2)	One Beauty shop would be for residents requiring nursing services and the other for independent residents. Both will offer beauty and barber services, manicure, and pedicure.
Library/Reading Room	A room for reading and quiet enjoyment. A "library shelf" may be set up for sharing books and magazines.
Party Room	Large space for large group activities such as resident or group meetings, social functions, and entertaining. The party room will be located on the top floor of the tower. The room may also function as a library and for chapel services.
Activity and Recreation Area	Uses to be determined by residents. Activities such as a craft room, game room, business center or a combination of activities can be accommodated.

The Land Use Ordinance allows accessory uses provided they are operated and maintained for the benefit or convenience of the owners, visitors, and employees of the zoning lot with the principal use.

6. Operations

Honolulu Neighborhood Housing Services, Inc. has entered into an operating agreement with Regency Pacific, Inc. to manage the nursing, assisted living, and food service operations at Kapiolani Akahi. Regency Pacific is a developer, owner, and operator of nursing and senior living facilities in Washington, Oregon, and Hawaii. They own a nursing home in Lihue, Kauai and are breaking ground for a new independent and assisted living facility in Puakea, Kauai. Regency Pacific also recently opened a new independent and assisted living facility in Kailua-Kona, Hawaii.

The State Health Planning and Development Agency issued a Certificate of Need to Honolulu Neighborhood Housing Services, Inc. to operate the 33-bed skilled nursing facility on June 12, 2003.

C. Economic Characteristics

1. Land Tenure

Honolulu Neighborhood Housing Services, Inc. acquired fee title to both lots in 2003. They have retained GMR (Graham Murata Russell) as Development Manager and Agent for the Kapiolani Akahi project.

2. Construction Cost and Phasing

The estimated development budget for the project is \$113 million (hard and soft costs including land). The direct construction cost is estimated at \$39 million. The source for the construction period costs will be procured through an \$80 million taxable bond issue.

Construction is projected to take 18-20 months and will commence after all necessary permits and approvals are received. Resident move-in is tentatively projected for late-2005 or early-2006.

D. Social Characteristics

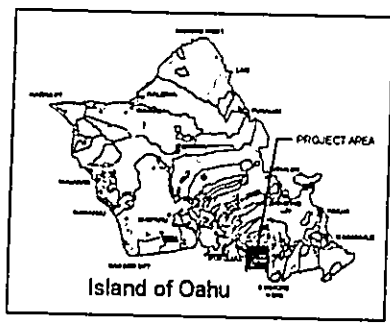
No business or residence will be displaced due to the proposed action.

The age requirement for entry into the Kapiolani Akahi independent living units will be 62 years and older. Additional requirements include the ability to live independently and the ability to carry the financial obligations.

When completed, the Kapiolani Akahi will provide employment for approximately 134 persons in various capacities. The facility will be staffed 24 hours a day, 7 days a week. A preliminary estimate of the number of employees and work shifts is summarized below.

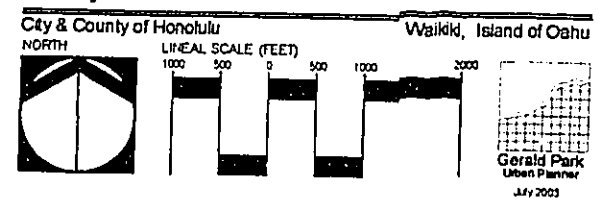
Table 1
Projected Employment, Kapiolani Akahi CCRC

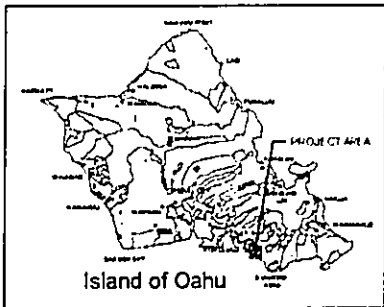
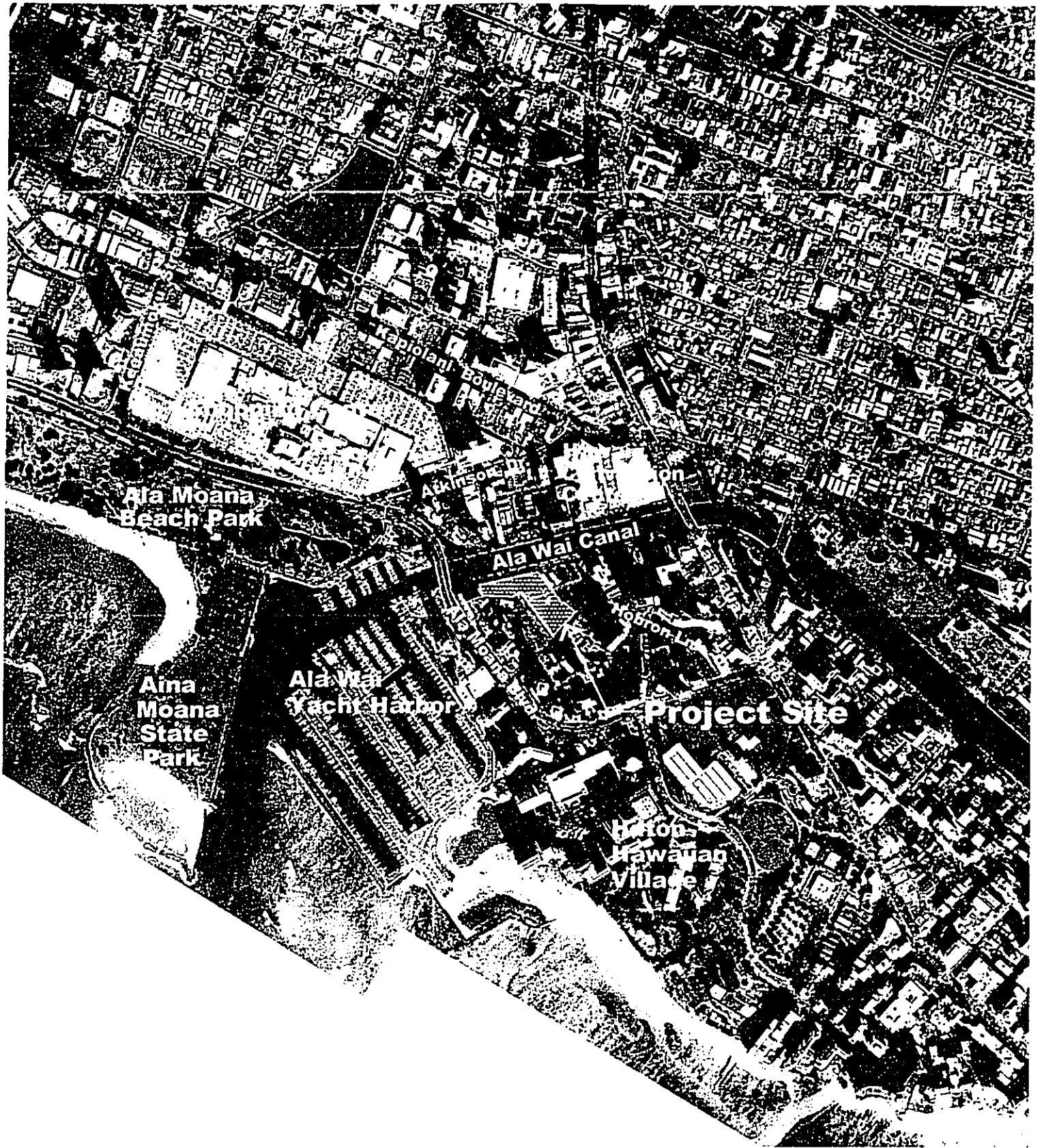
Category/Shift	6:00 AM 2:30 PM	2:30 PM 11:00 PM	11:00 PM 6:00 AM
Healthcare	30	12	5
Food Service	11	12	0
Housekeeping	4	4	0
Management			
Executive Staff	16	16	0
Security	2	2	2
Maintenance	5	5	0
Part-Timers	4	4	0
Total Employees	72	55	7



Source: USGS, Honolulu Quadrangle

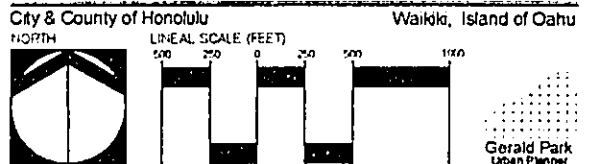
Figure 1
 Location Map
 Kapiolani Akahi CCRC





Source: City & County of Honolulu, GIS Database

Figure 2
Vicinity Map
Kapiolani Akahi CCRC



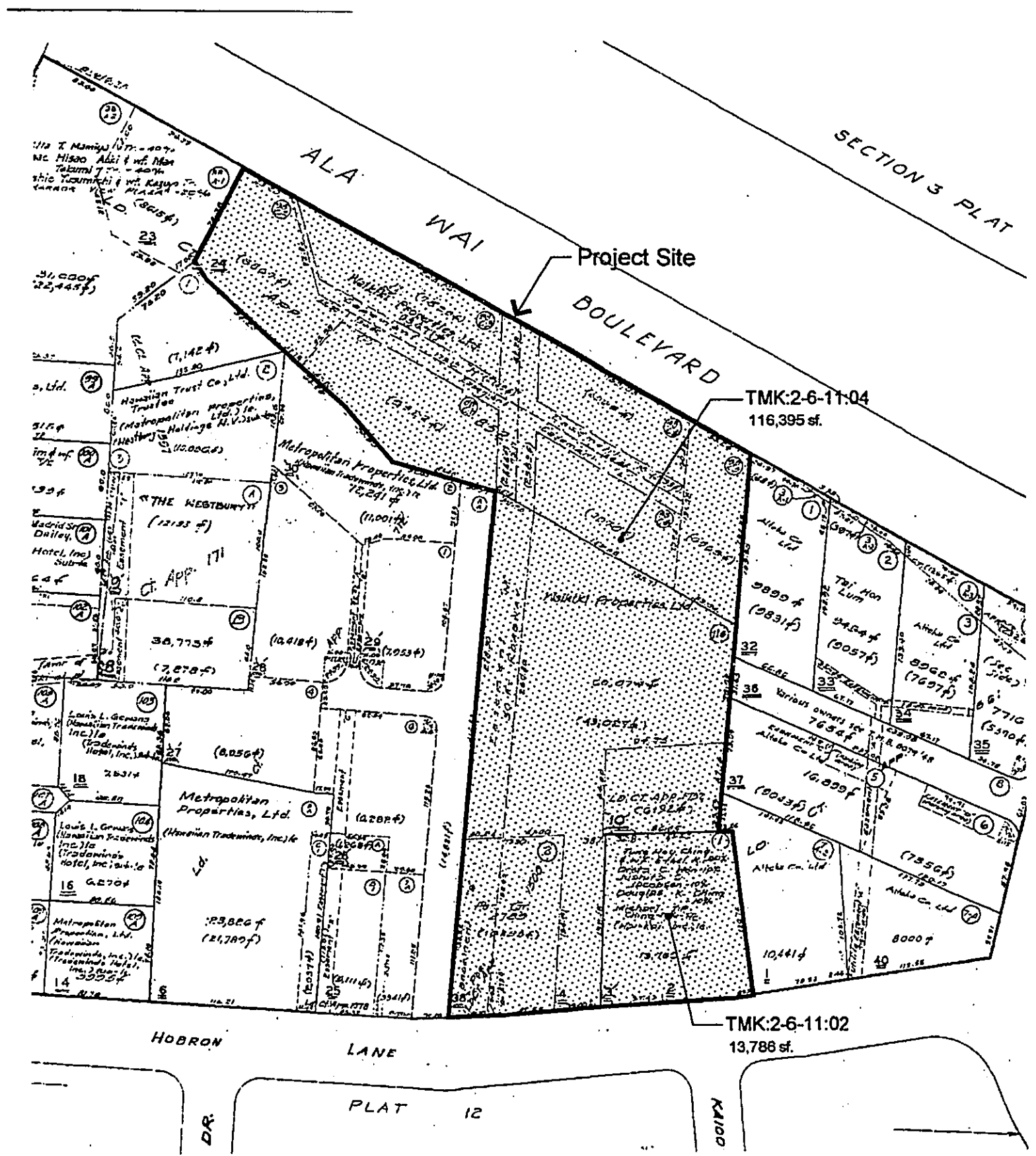


Figure 3
Tax Map Key
Kapiolani Akahi CCRC

FIRST DIVISION			
ZONE	SEC.	PLAT	
2	6	11	
CONTAINING		PARCEL	
Scale: 1 in. = 50 ft.			

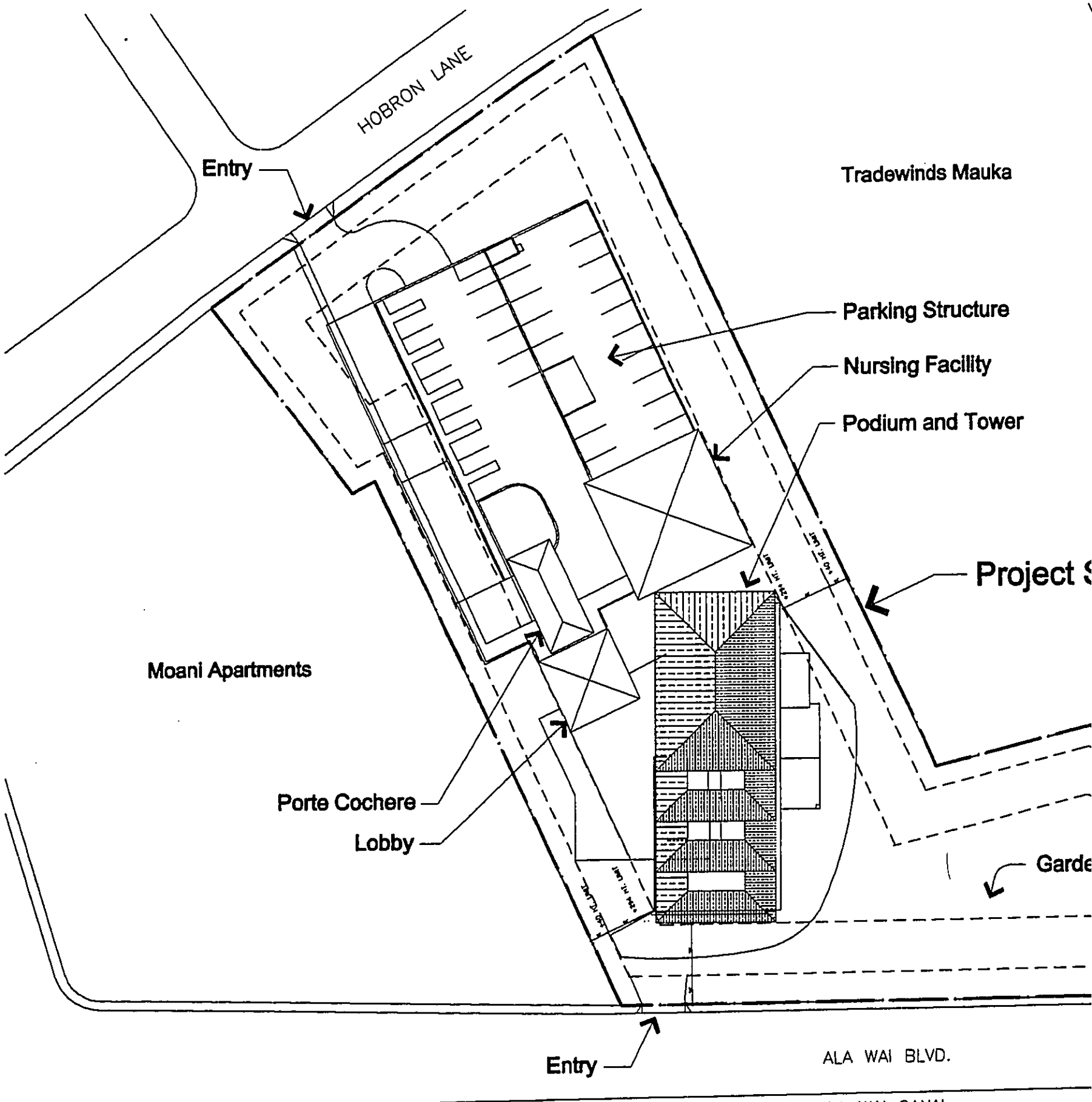
Source: Department of Taxation, Taxation Maps Bureau

City & County of Honolulu
 NORTH

Waikiki, Island of Oahu

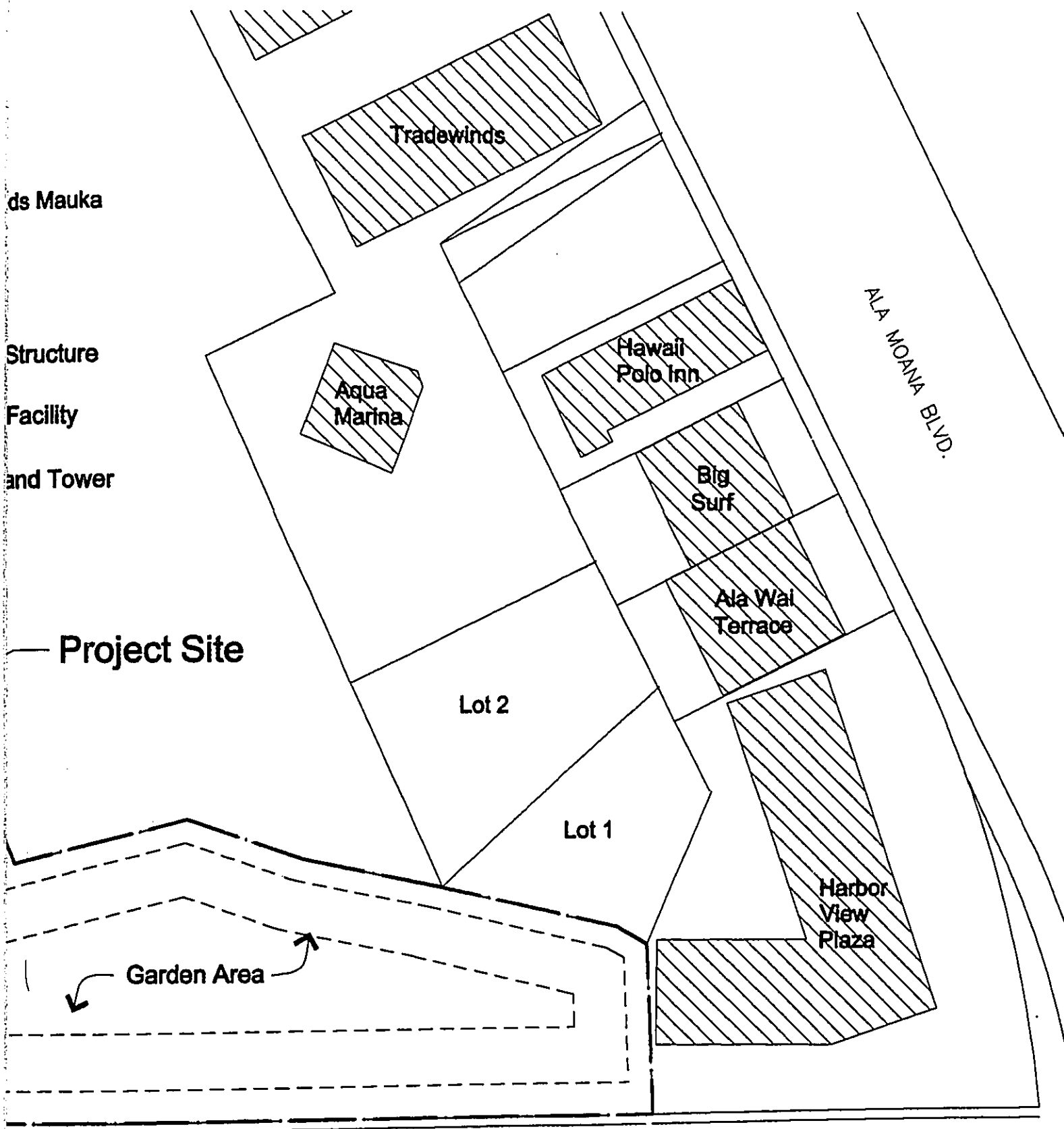
LINEAL SCALE (FEET)

Gerald Park
 Urban Planner
 July 2003



SCA

KAPIOLANI AKAHI CC
SITE PLAN

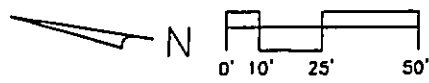


/D.

AL

KAHI CCRC

AN



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ALA WAI CANAL

ALA WAI ENTRY

ALA WAI BLVD.

GARDEN

STAFF PARKING

ACTIVITY ROOM

BEAUTY SHOP

MEN'S LOCKER ROOM

WOMEN'S LOCKER ROOM

TRAINER

SWIMMING POOL

EXERCISE ROOM

MINI-STORAGE 33

TRASH STORAGE

ELEV. LOBBY

SVC. ELEV.

TEL.

FIRE CTRL. CENTER

CORRIDOR

VESTIBULE

MINI-STORAGE 33

LAND

LOADING PARKING

LOADING DOCK

SERVICE DRIVEWAY

SERVICE DRIVEWAY

DRIVEWAY

DRIVEWAY

LANDSCAPE

+40 HT. LIMIT

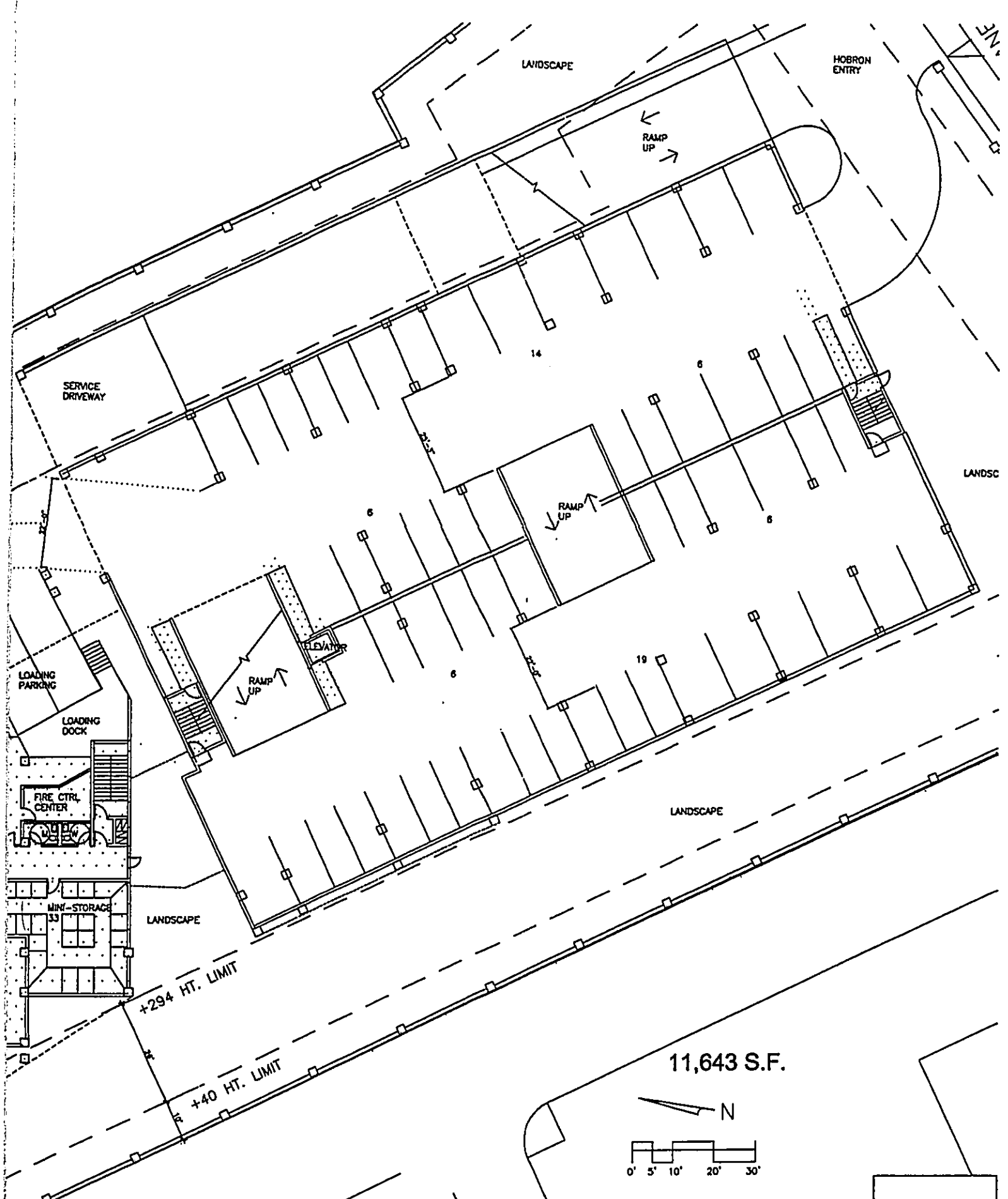
+294' HT. LIMIT

SERVICE DRIVEWAY

SCA

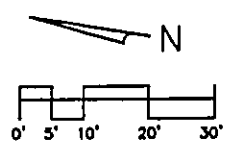
LANDSCAPE

KAPIOLANI AKAHI C



AKAHI CCRC

L-1 GARDEN LEVEL PLAN
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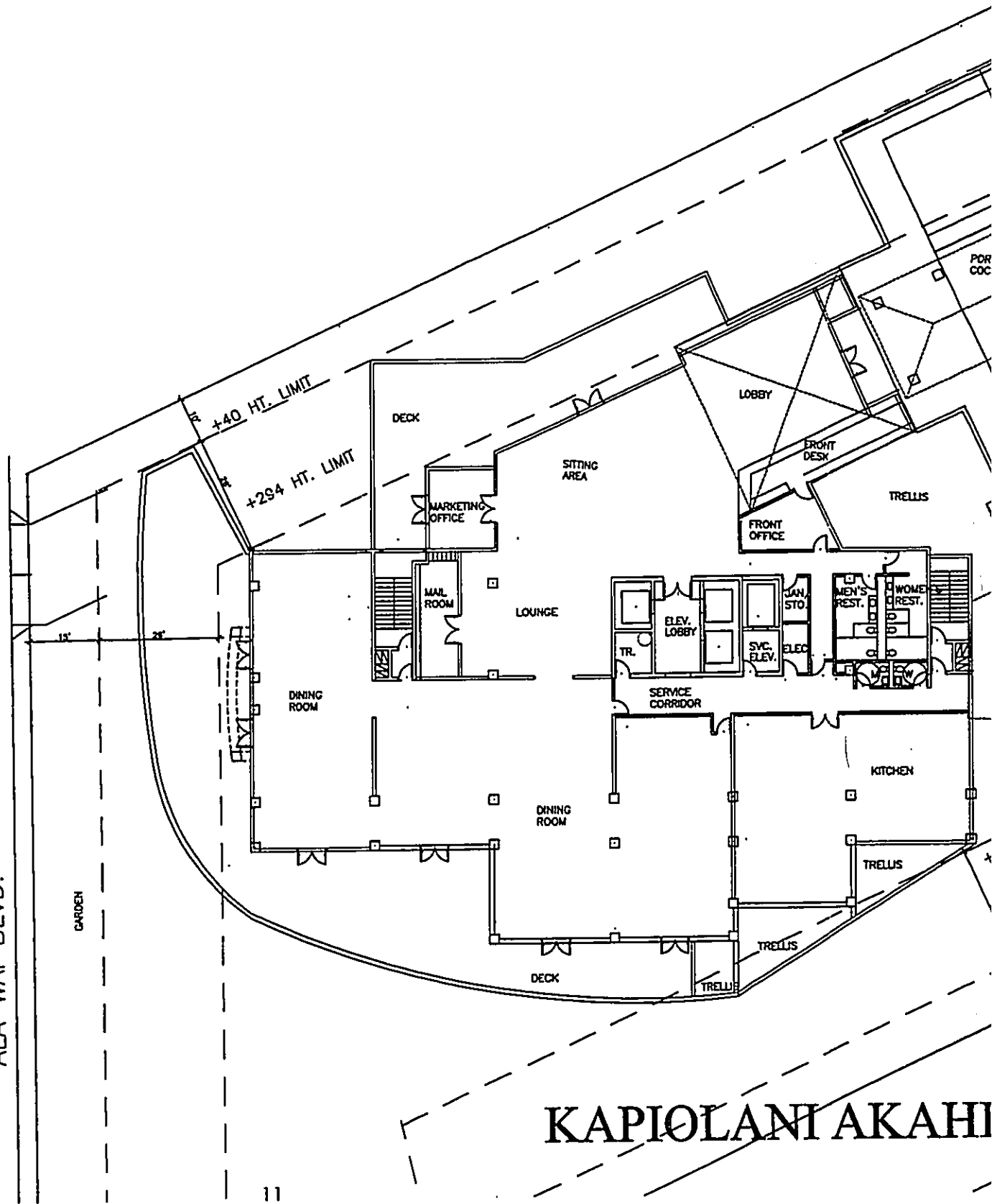


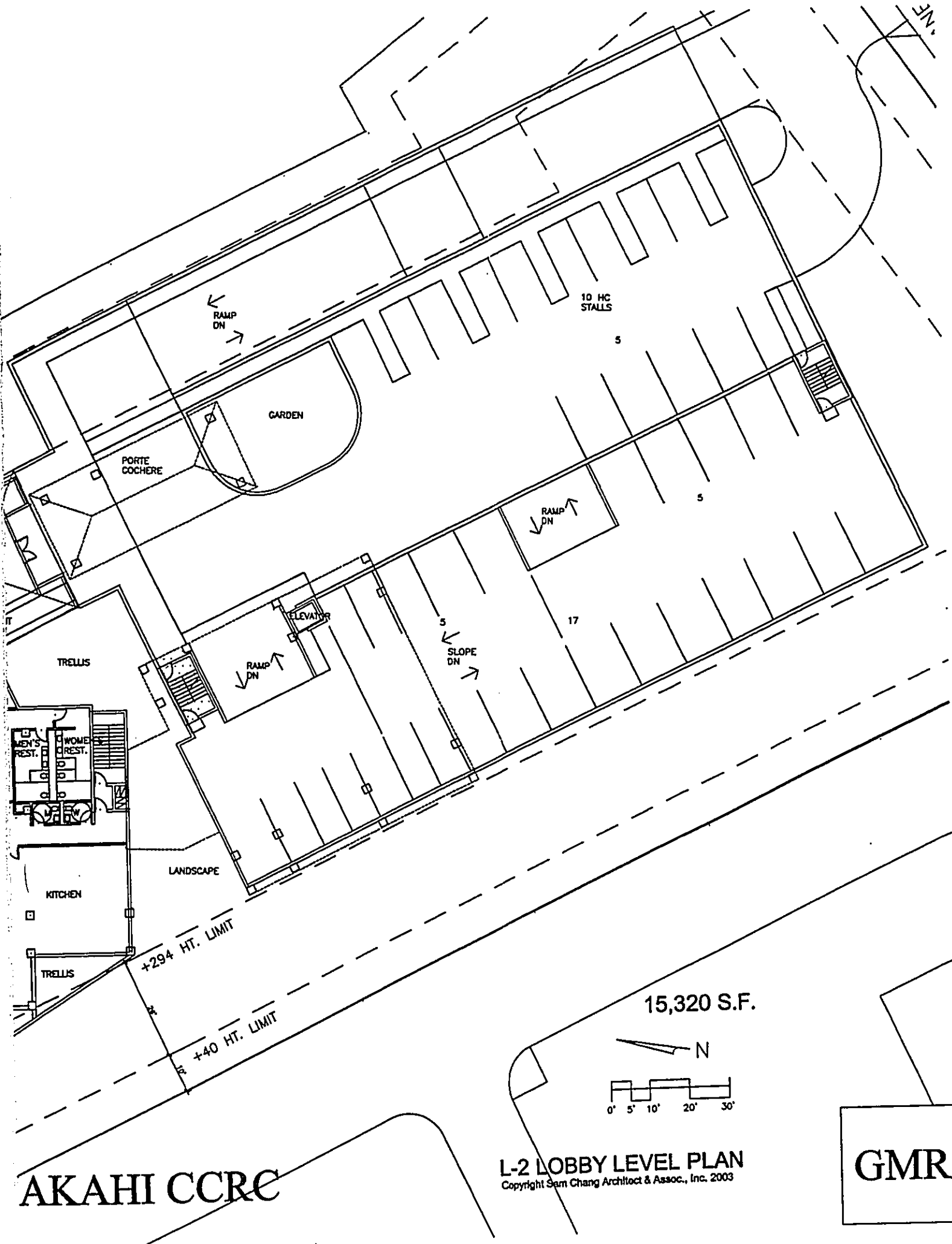
ALA WAI CANAL

SCA

ALA WAI BLVD.

GARDEN





AKAHI CCRC

L-2 LOBBY LEVEL PLAN
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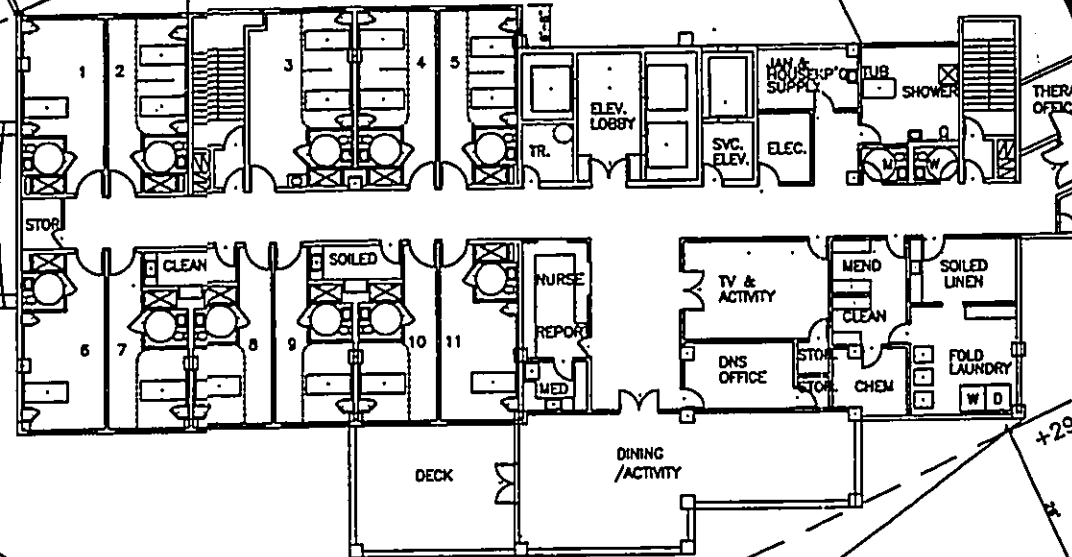
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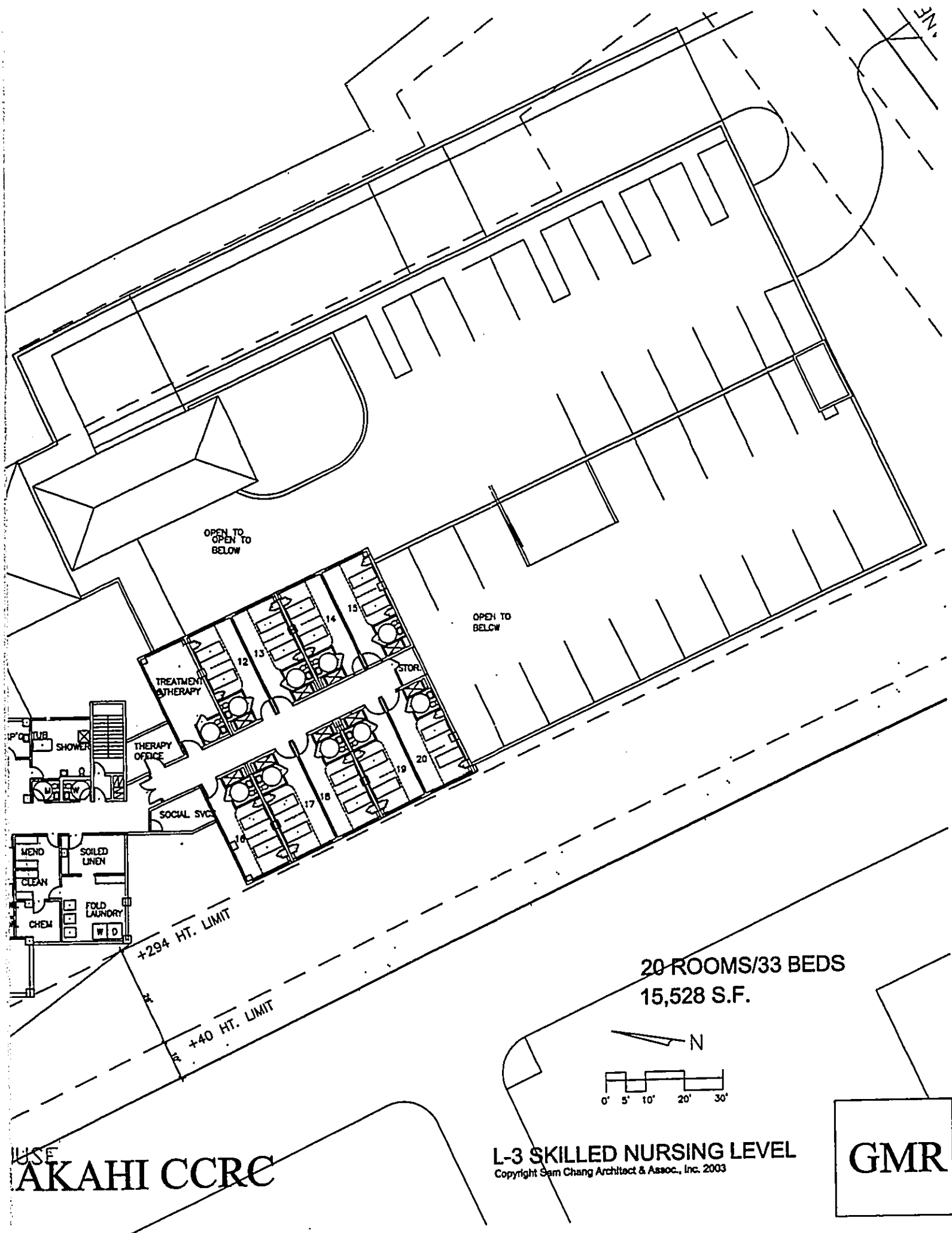
GARDEN

+40 HT. LIMIT
+294 HT. LIMIT



+294

PENTHOUSE
KAPIOLANI AKAHU



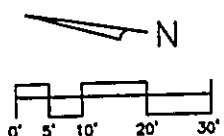
OPEN TO
OPEN TO
BELOW

OPEN TO
BELOW

+294 HT. LIMIT

+40 HT. LIMIT

20 ROOMS/33 BEDS
15,528 S.F.



AKAHI CCRC

L-3 SKILLED NURSING LEVEL
Copyright Sam Chang Architect & Assoc., Inc. 2003

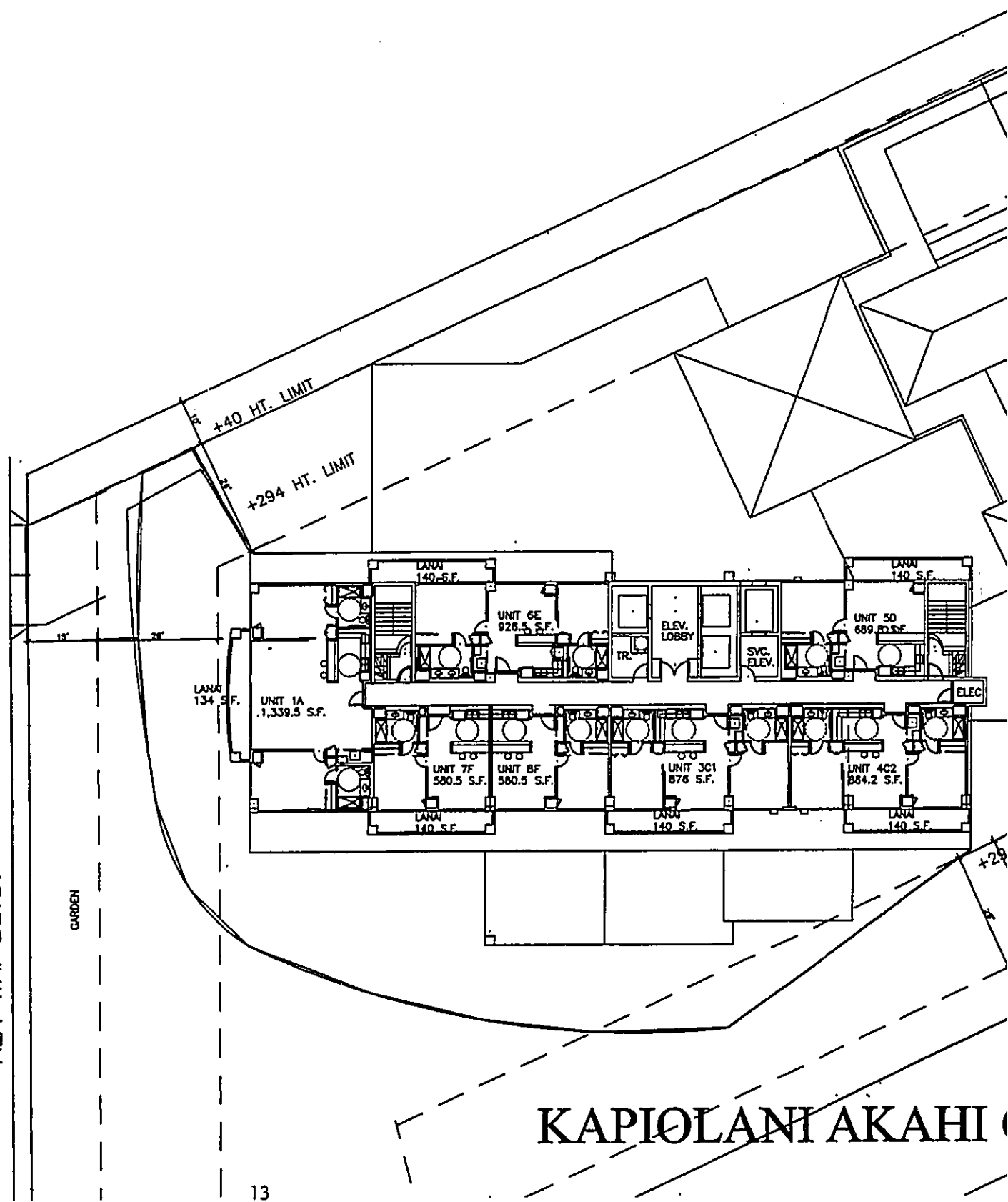


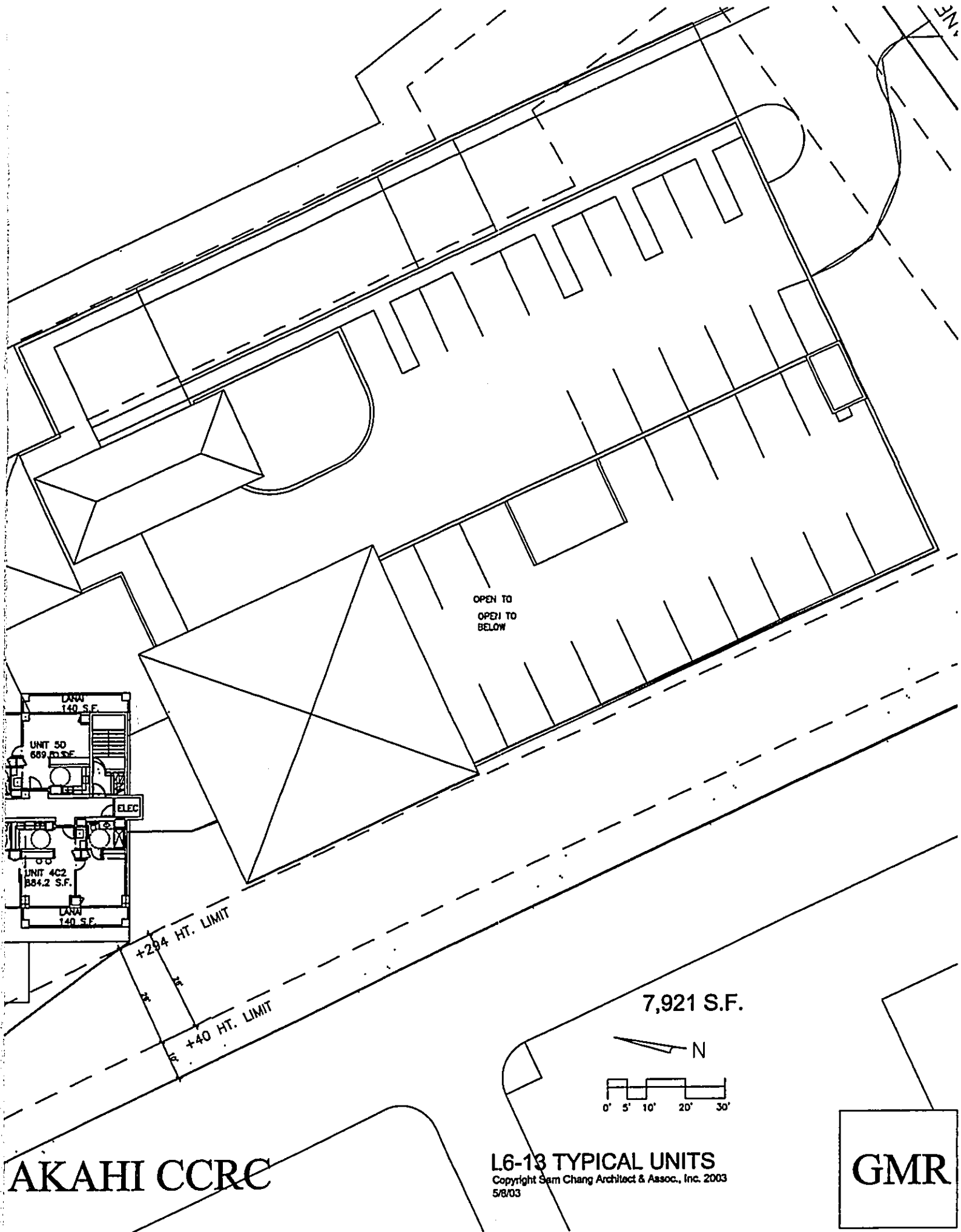
ALA WAI CANAL

SCA

ALA WAI BLVD.

GARDEN





AKAHI CCRC

L6-13 TYPICAL UNITS
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 5/8/03

GMR

ALA WAI CANAL

SCA

ALA WAI BLVD.

GARDEN

+40 HT. LIMIT

+294 HT. LIMIT

LAWA 134 S.F.

UNIT 1A
1,339.5 S.F.

LAWA 140 S.F.

UNIT 6E
926.5 S.F.

ELEV.
LOBBY

SVC.
ELEV.

LAWA 140 S.F.

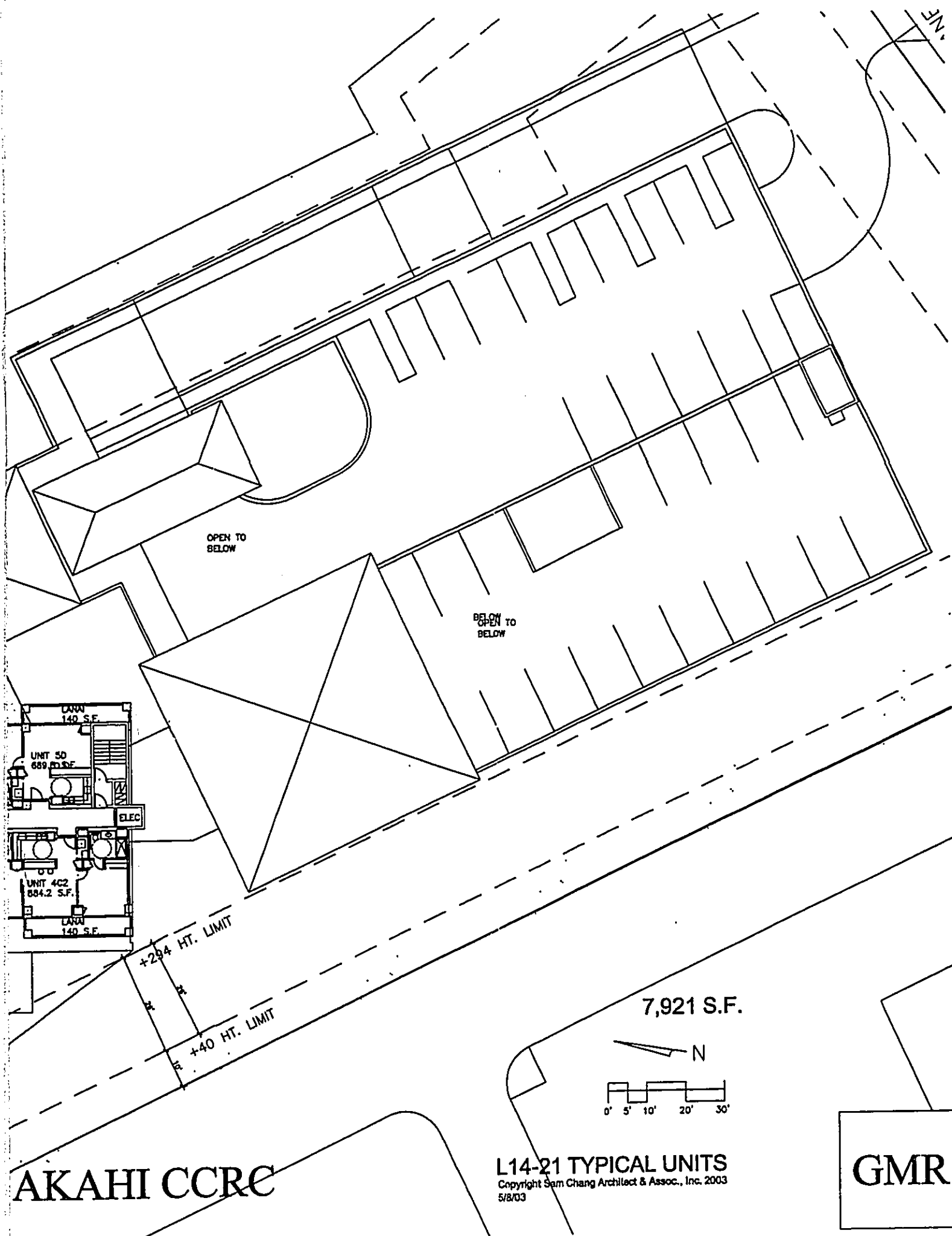
UNIT 5D
689 S.F.

UNIT 2B
1,172 S.F.

UNIT 3C1
876 S.F.

UNIT 4C2
884.2 S.F.

KAPIOLANI AKAHI

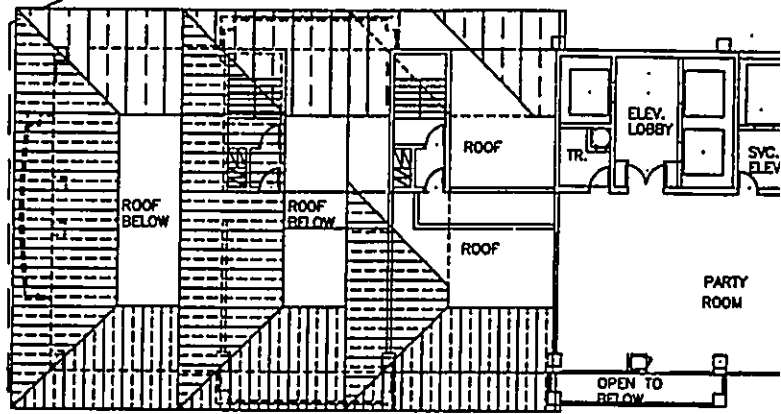


AKAHI CCRC

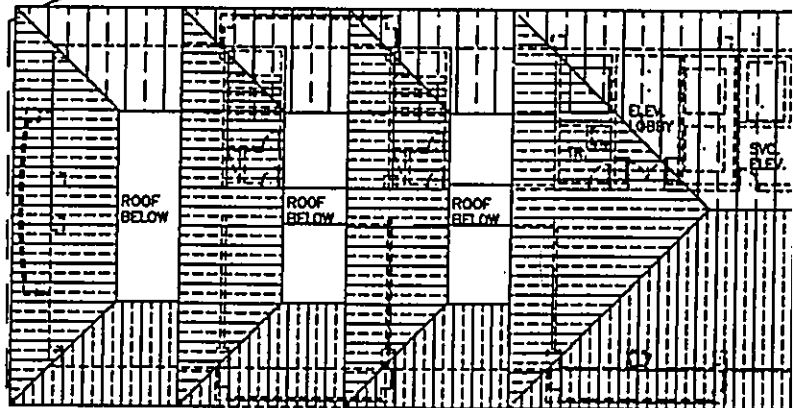
L14-21 TYPICAL UNITS
 Copyright Sam Chang Architect & Assoc., Inc. 2003
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+294 HT. LIMIT



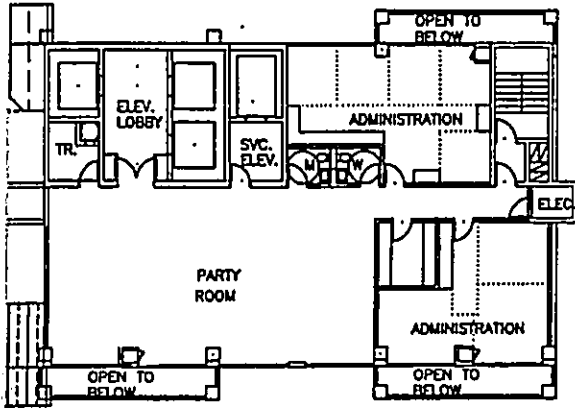
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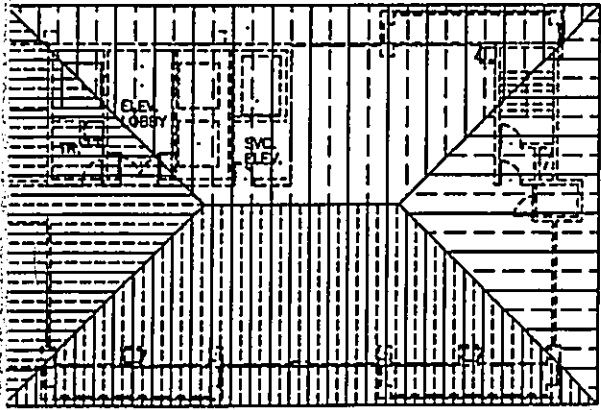
L-26

SCA

ROOF
KAPIOLANI AKAHU C

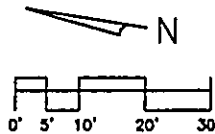


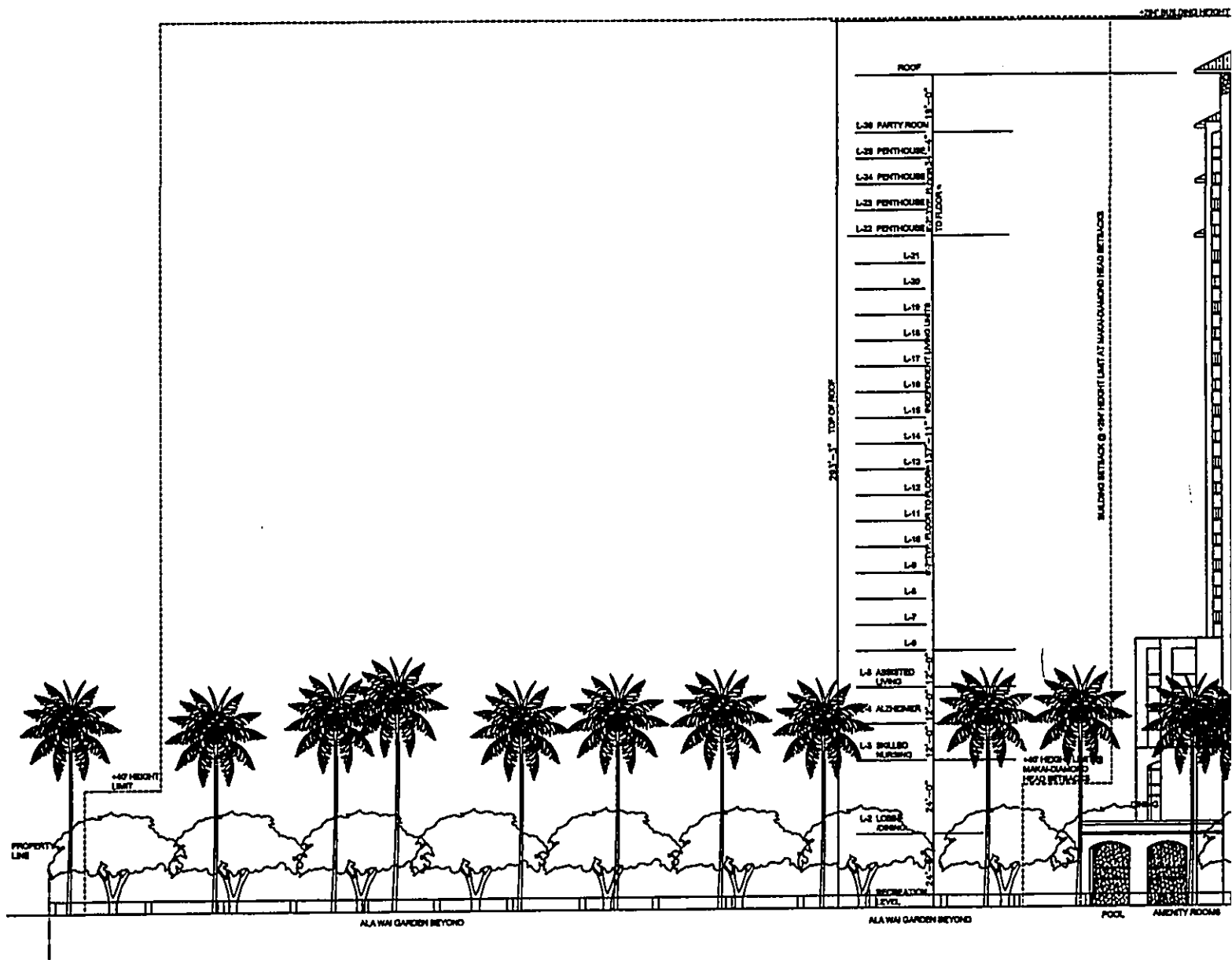
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L-26 PARTY ROOM



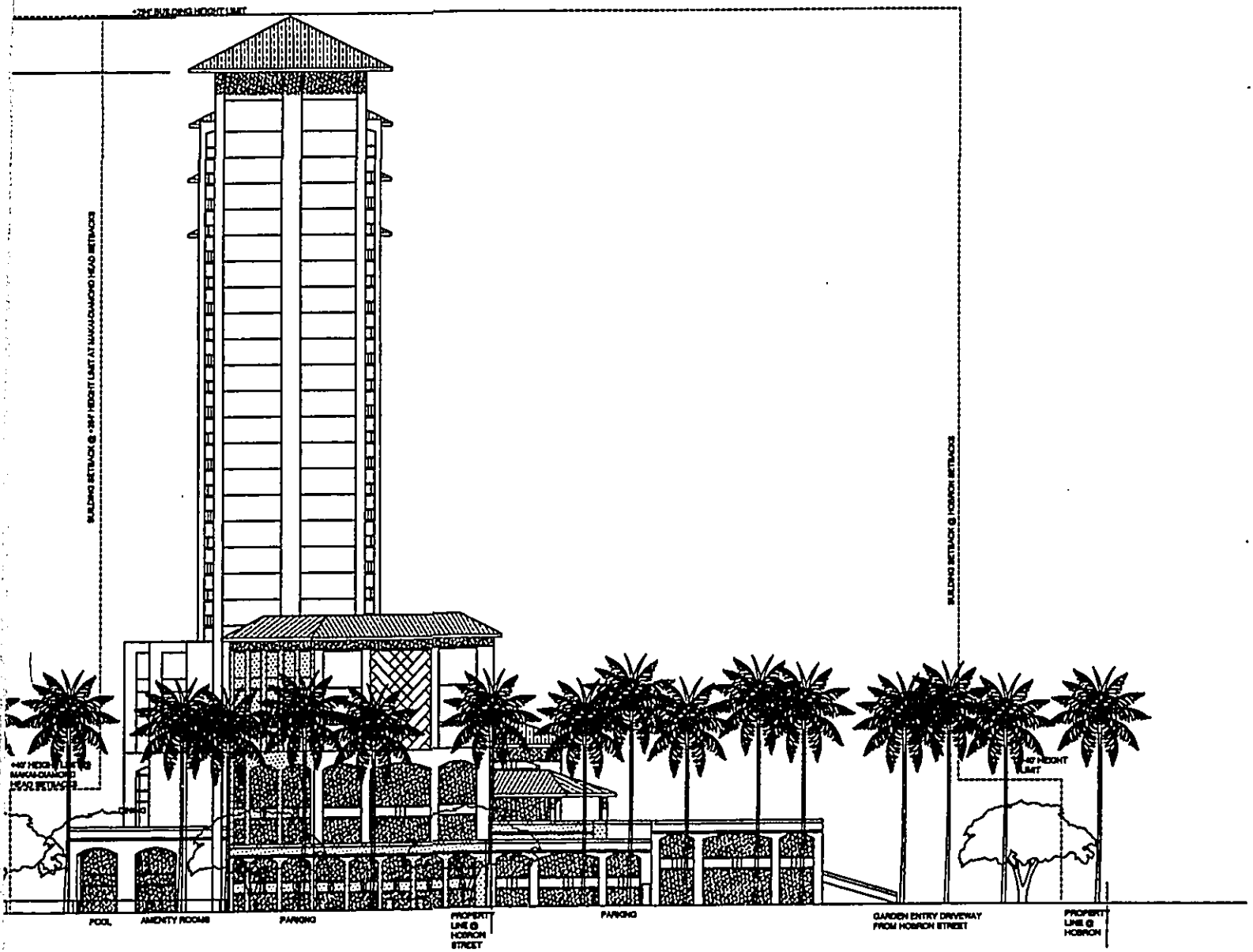
ROOF PLAN
AKAHI CCRC

L-26 PARTY ROOM
AND ROOF PLAN
Copyright Sam Chang Architect & Assoc., Inc. 2003
5/8/03





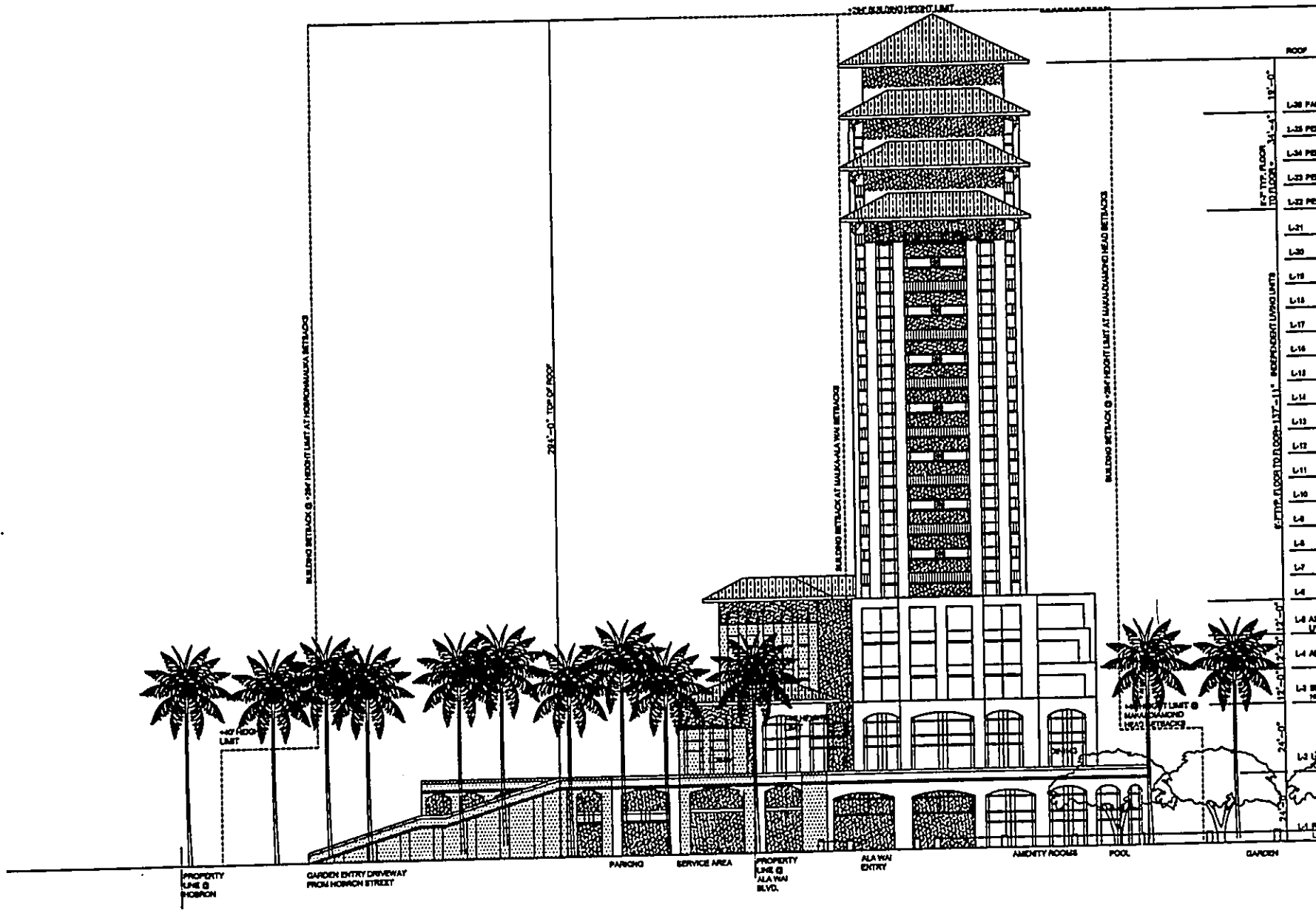
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AKAHI CCRC

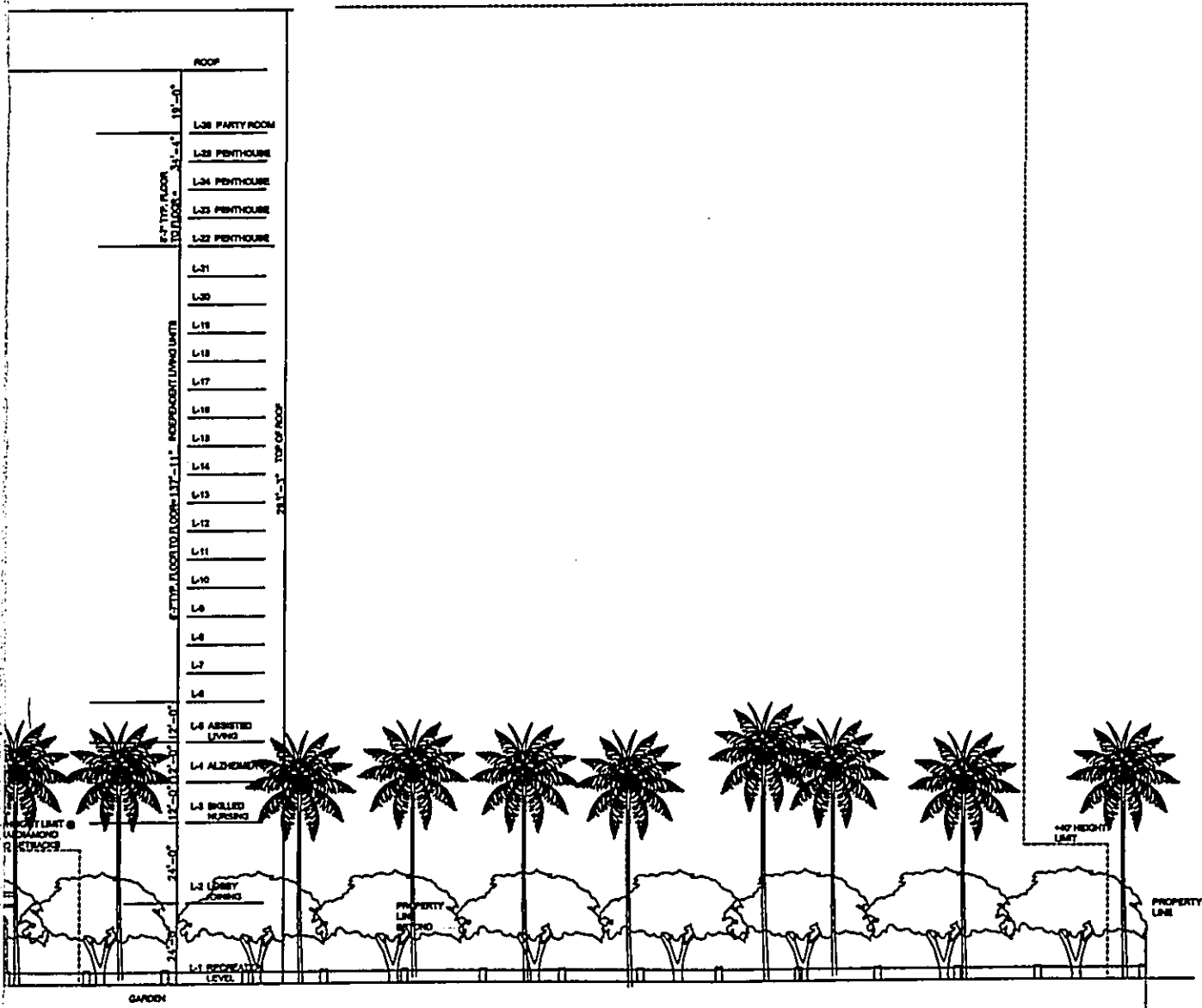
HOBRON ELEVATION
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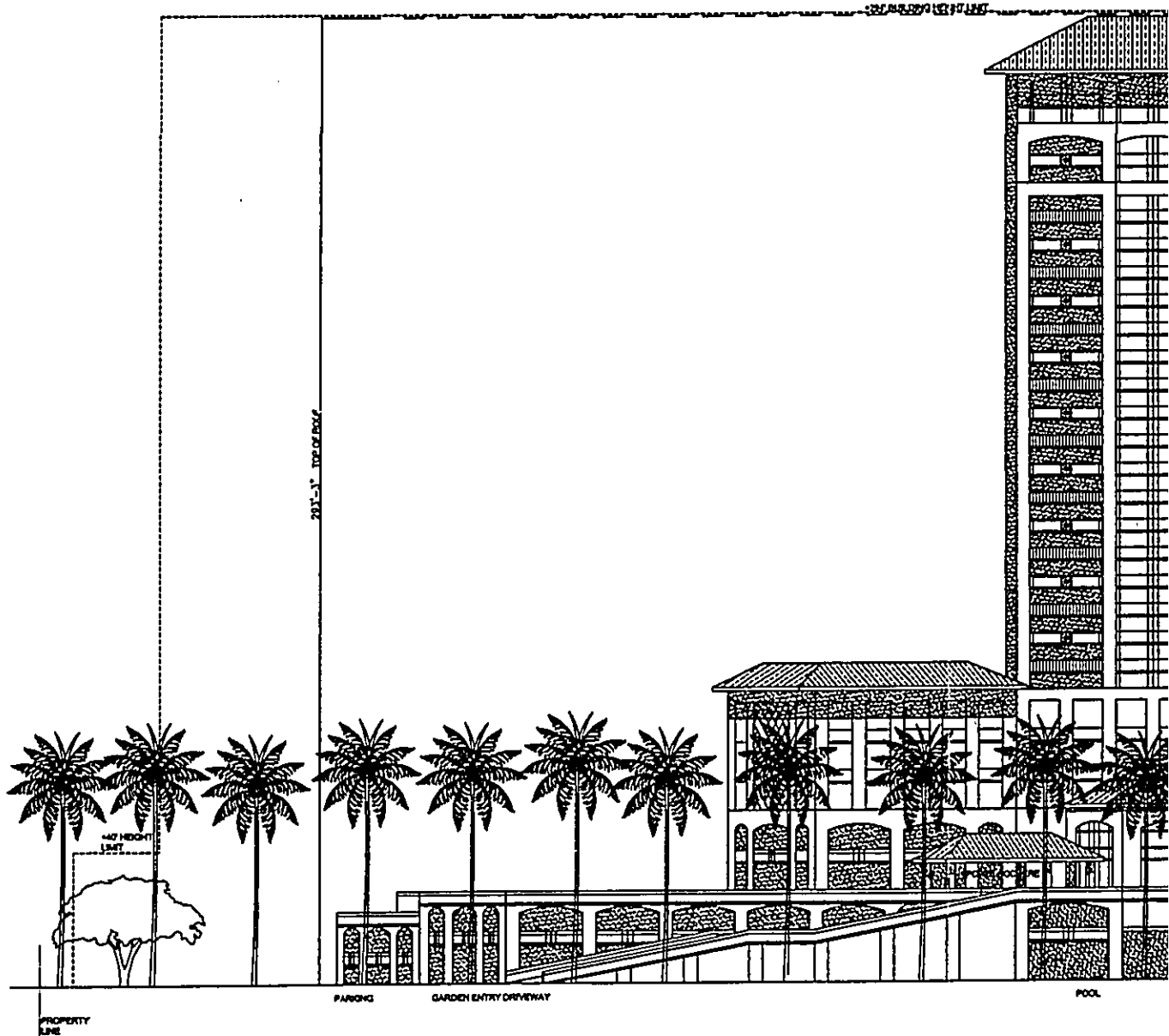
KAPIOLANI AKAHI



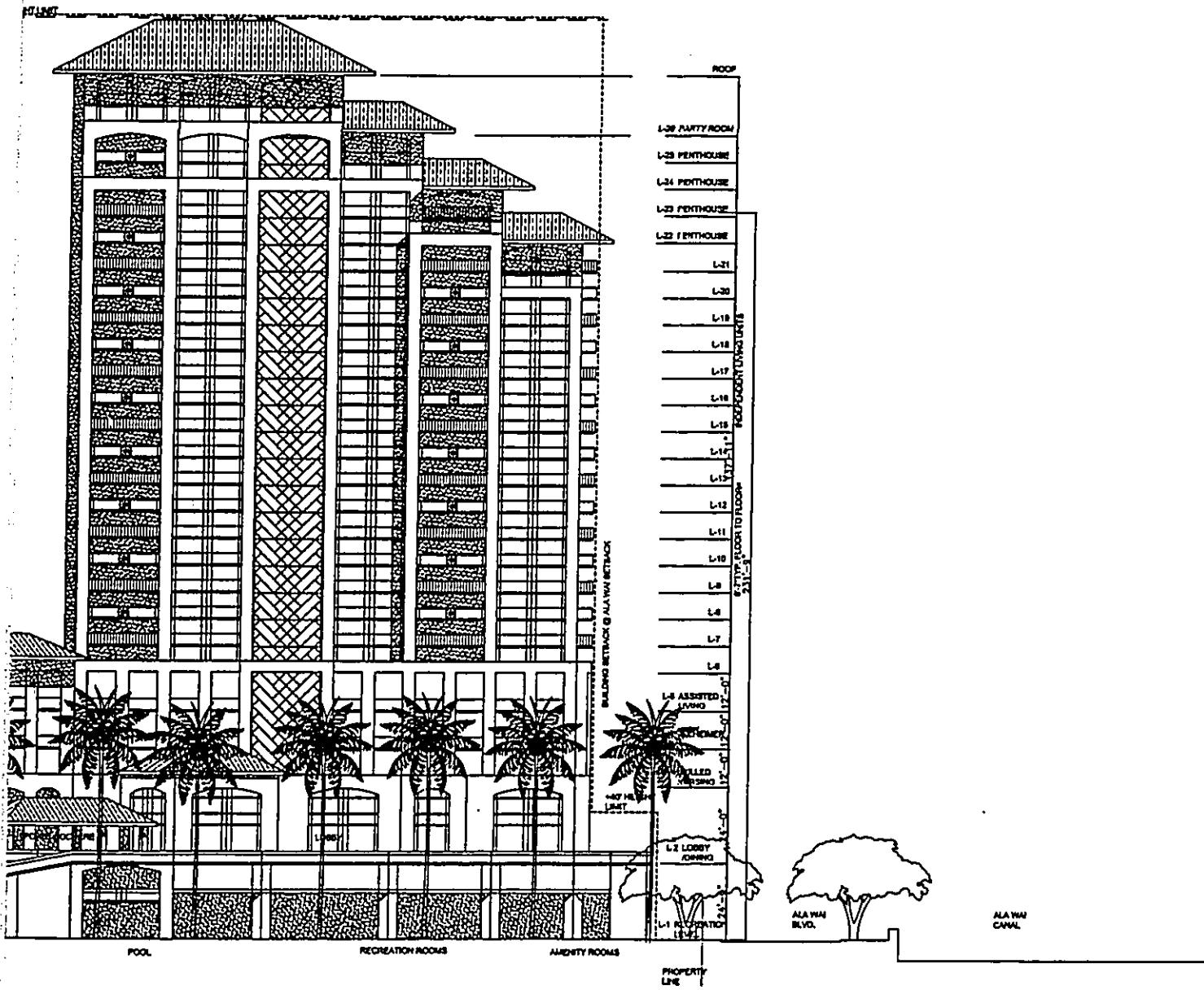
AKAHI CCRC

ALA WAI ELEVATION
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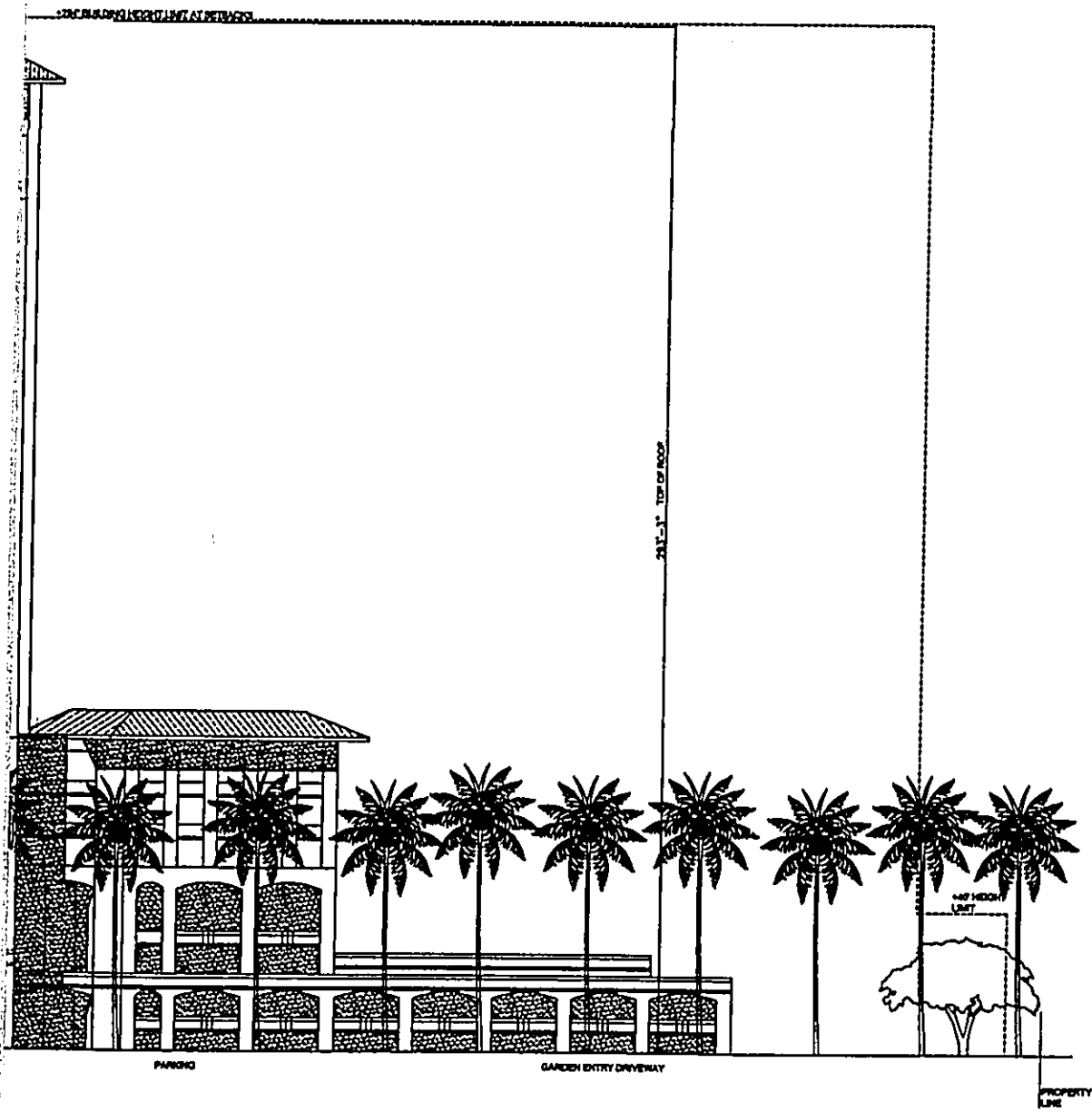
AKAHI CCRC

MAUKA ELEVATION
 Copyright Sam Chang Architect & Assoc., Inc. 2003





SCA



AKAHI CCRC

MAKAI ELEVATION
 Copyright Sam Chang Architect & Assoc., Inc. 2003



A. Existing Use and Improvements

Two parcels comprise the Kapiolani Akahi site. The project site was once improved as a cluster of low-rise apartment buildings consisting of 212 apartment units. The buildings were demolished in 1998 and both properties have been vacant since that time.

Parcel 2, the smaller of the two parcels at 13,786 square feet, is a trapezoidal shaped lot fronting on Hobron Lane. The lot is covered entirely with asphalt (See Image 1). A combination chain link and corrugated metal sheeting fence bounds the lot on its north side and a hollow tile wall bounds the lot on its east side. The south side along Hobron Lane is fenced with a line of 4-foot high metal posts. The Hobron Lane frontage is approximately 120 lineal feet.

Parcel 4, the larger of the two lots (116,395 square feet), is shaped like a "reverse-L." Approximately one-half of the lot (its southern half) is paved with asphalt and appears to have been used for parking. [Note: Vehicles were observed parked on the lot on several occasions.] The remainder is planted in grass with an assortment of trees and palms comprising the sparse landscaping. A corrugated metal building (identified as a maintenance/shop building for the previous owner) and a metal parking structure/shed are located along the northeast property line (See Images 2, 3, and 4). Parcel 4 has approximately 460 lineal feet of frontage along Ala Wai Boulevard and approximately 122 feet along Hobron Lane.

The Tradewinds Mauka, a cluster of 3-story walk-up apartments, borders Parcel 4 on the southwest. The Moani Apartments, also a cluster of 3-story walk-up apartments, borders Parcel 4 and part of Parcel 2 on the north. Most of the Tradewinds Mauka apartments are occupied whereas most of the Moani Apartment units are vacant. Two adjoining vacant lots are to the northeast of Parcel 2.

The Department of Planning and Permitting approved a Conditional Use Permit to convert the former Ohana Hobron hotel, located across the street from the proposed Kapiolani Akahi, to a group living facility in October 2002. The hotel was renamed the Hale Nohona and, following its physical conversion, would have provided 184 independent living units. In June 2003, it was learned that the developers of the Hale Nohona have decided not to proceed with their plans for a group living facility on that property. The name Hale Nohona is used in this Environmental Assessment pending a permanent name change by the developer.

A two-story (H&Y Hobron Apartments) and a three-story apartment building (Laniakea Apartments) are located across the project site at the corner of Hobron Lane and Kaioo Drive.

B. Environmental Conditions**1. Soils**

The Soil Conservation Service (1972) soil map (Sheet No. 63) for the area identifies one soil type--fill land (FL)--over the entire property. This soil type consists of areas filled with material dredged from the ocean or hauled from nearby areas, garbage, and general material from other sources. An agent of the owner recalls that the project site (and areas adjoining the site) was filled with spoil dredged to create the Ala Wai Canal.

2. Topography

The site is relatively flat having been previously filled, graded, and paved for a low-rise apartment complex. Ground elevation varies between 8 and 9 feet above mean sea level. It appears that the middle of the site slopes in all directions towards its peripheries.

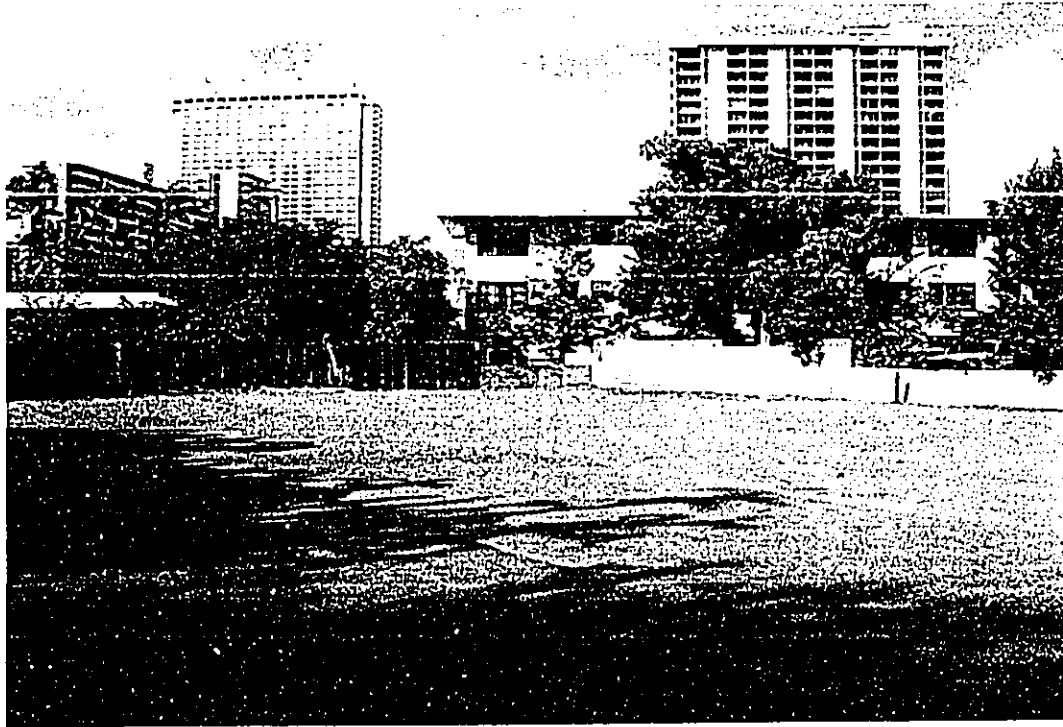


Image 1. View of Project Site (Parcel 2) Looking North from Hobron Lane.



Image 2. Project Site (Parcel 4) Looking North.



Image 3. Project Site (Parcel 4) Looking East. Ala Wai Boulevard is to the Left.



Image 4. Metal Shed and Building on Eastern Side of Parcel 4.

3. Flood Hazard/Drainage

The Flood Insurance Rate Map (FIRM) for the area places the project site in Zone AO which is defined as "areas or 100-year shallow flooding where depths are between one to three feet; average depths determined (Federal Emergency Management Agency, 2000)." The calculated flood depth for the property is 2 feet (See Figure 15).

Drain inlets and catch basins along the mauka and Ewa ends of the site collect surface runoff from the site. Runoff is conveyed via existing pipes under Ala Wai Boulevard and Lipeepee Street and discharged into the Ala Wai Canal. Catch basins along Hobron Lane and Ala Moana Boulevard convey storm water to a 5-foot by 3-foot box drain along Ala Moana Boulevard. The box drain also discharges into the Ala Wai Canal.

4. Tsunami Inundation

The property is not situated in a coastal high hazard or tsunami inundation area. Sections of the Ala Wai Canal between the Ala Wai Yacht Harbor on the west and Kalakaua Avenue on the east are designated as a tsunami evacuation area (Oahu Civil Defense Agency).

5. Groundwater

Groundwater resources in the area are listed as being part of the Nuuanu aquifer system of the Honolulu aquifer sector. According to Mink and Lau (1990) two aquifers underlie this part of Waikiki. The uppermost contains groundwater that is basal and unconfined in sedimentary non-volcanic rocks. The lowermost aquifer is also basal and confined within horizontally extensive flank volcanic lava rocks. The Aquifer Code assigned by Mink and Lau signifies that the upper aquifer has a potential for use, but is neither suitable for drinking nor ecologically important; has a moderate salinity of 1,000-5,000 mg/l Cl, is replaceable, and highly vulnerable to contamination. The lowermost aquifer is currently used as a drinking water supply, is fresh with a salinity of <250 mg/l Cl, and is irreplaceable with a low vulnerability to contamination (In Brewer Environmental Services, 2003).

Although actual groundwater level at the site is undetermined, previous limited borings in conjunction with a Phase II Environmental Site Assessment encountered groundwater at approximately three feet below the surface (Brewer, 2000).

The Underground Injection Control ("UIC") line was established by the State Department of Health to protect groundwater resources. Groundwater landward(mauka) of the UIC line is considered to be a drinking water source. Groundwater seaward (makai) of the UIC line is considered as non-potable and saline. The UIC line runs along Kapiolani Boulevard and then the Ala Wai Canal in the vicinity of the project site. The project site is thus located makai of the UIC line (Ibid).

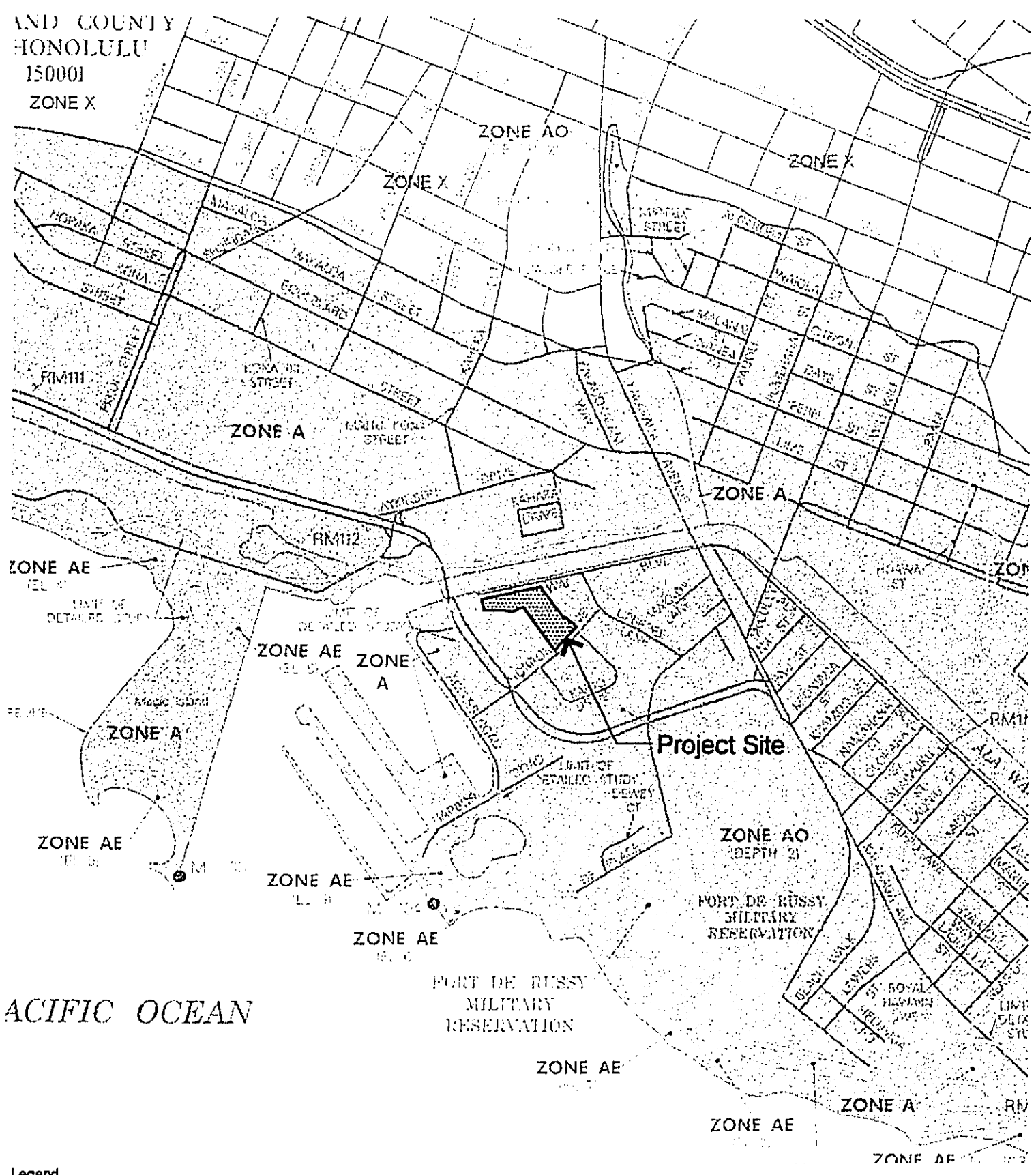
6. Surface Water

There are no streams, ponds, or wetlands on the premises. The nearest water feature is the man-made Ala Wai Canal. The Canal was dredged in the early 1920s to divert stream flow from discharging into the ocean off Waikiki. The Ala Wai Canal is located across Ala Wai Boulevard about 100 lineal feet from the project site.

7. Flora

The approximately 3-acre site is sparsely landscaped. Coconut is the most common palm, with isolated growth of octopus, mango, and milo trees. A row of opiuma trees grow along the length of the property boundary between parcels 2 and 4. An unidentified pine (Norfolk or Cook Island) grows in the northwest corner next to the Harbor View Plaza condominium. Panax, hibiscus, and ipomea are the predominant shrubs; panax is used to screen the property from several buildings comprising the Tradewinds Mauka apartments. Bermuda grass and isolated wedelia patches are the primary ground

DOCUMENT CAPTURED AS RECEIVED



- Legend**
- Special Flood Hazard Zone Inundated by 100-Year Flood
 - Zone AE Base Flood Elevation Determined.
 - Zone A Base Flood Elevation Not Determined.
 - Zone AO Areas of 100 Year Shallow Flooding Where Depths Are Between 1 to 3 Feet; Average Depth Determined.
 - Zone X Areas Determined to be Outside 500-Year Floodplain.

Source: Federal Emergency Management Agency, Flood Insurance Rate Map
 Map Number 15003C0365E & 15003C0370E
 Date: November 2000.

Figure 15
Flood Insurance Rate Map
Kapiolani Akahi CCRC

City & County of Honolulu Waikiki, Island of Oahu

NORTH

LINEAL SCALE (FEET)

0 250 500 1000

Gerald Park
 Urban Planner
 July, 2003

cover in areas that are not paved with asphalt concrete.

None of the observed flora is listed or nominated for rare, threatened, or endangered status.

8. Fauna

No significant wildlife was observed during several field inspections. Dogs and cats were seen on the edges of the property; however, none were observed browsing the premises probably because they are kept out by fencing surrounding the property.

Barred dove, common mynah, house sparrow, and pigeons roost in the trees growing on the premises.

9. Archaeological Resources

There are no recorded archaeological features on the ground surface. In spite of the absence of surface features, there is no assurance that there are no subsurface features. Burials have been unearthed in locations near the Hobron area (Hilton Hawaiian Village, Fort DeRussy, and at Ena Road and Kalakaua Avenue. Staff of the State Historic Preservation Division was consulted about the need for a subsurface investigation. Staff is aware that the area was created by fill in the early twentieth century, thus the probability of historic burials being present in the fill material is low.

Applicant, however, will prepare an archaeological monitoring plan in the unlikely event burials are uncovered during construction. The Archaeological Monitoring Plan shall be submitted to the State Historic Preservation Division for review and approval prior to construction.

10. Cultural Resources

Because the property was created from fill materials and given a history of urban activities on the site and in the immediate area, it is unlikely that cultural practices occurred on the property in the recent past and no on-going cultural activities are likely. This contention is supported by the absence of surface archaeological features, sacred sites, known burials, hunting and gathering resources, and known historic trails.

11. Hazardous Materials

A Phase I Environmental Site Assessment for the project site was completed in late 2002 (BEI Environmental Services). A summary of findings is presented below.

- Containers of hazardous chemical-containing substances (paints, primers, caulking compounds, two fire extinguishers, and sealants) were found stored in the maintenance/storage building located on Parcel 4. Should these materials not be completely used or are to be discarded, the remaining contents should be properly disposed of according to HDOH and USEPA guidelines.
- A dark gray stain about nine feet in diameter was present in an area approximately 100 feet to the west of the maintenance/storage building. The stain had a diesel fuel-like odor and may have been the result of a fuel leak from a parked vehicle. The asphalt in the stained area was cracked and deteriorated. It is therefore likely that the spilled material has penetrated at least several inches into the soil beneath the asphalt. The stain should be excavated and removed.
- The interior of the electrical switch box found on the ground beneath the open-sided parking structure should be checked for suspect PCB-containing electrical equipment.
- The maintenance/storage building and the parking/shed structure contained suspect LBP. Painted surfaces should be tested for lead before renovation or demolition.

- The maintenance/storage building contained suspect ACM in the form of transite panels, canec roofing insulation, vinyl floor tiles and sheeting, wall board, and insulation attached to the exterior of the three boilers and associated piping located in the boiler room. The insulation covering the boilers and pipes were in poor and deteriorated condition. Suspect ACM should be tested before renovation or demolition.
- One used refrigerator, one used ice-making machine, and a drinking fountain was found inside of the maintenance/storage building and in the shed. The refrigerator and ice-making machine uses chlorofluorocarbons (CFCs) as a refrigerant. All CFCs are EPA regulated materials with specific guidelines for their disposal. If the units are to be serviced, taken out of service, or demolished, then the CFCs must be handled in accordance with these regulations that govern their removal, transport, and disposal.
- The box "drain" located near the north corner of Parcel 4 is a potential environmental concern because chemical materials could enter the box via surface water runoff from adjacent properties or by illegal dumping.

12. Open Space and Views

The Waikiki Special District Ordinance does not identify significant public views of Waikiki landmarks, view planes, or views of the ocean or mountain from public vantage points in the Hobron area.

The Waikiki Special District proposes a pedestrian promenade circling Waikiki. In general, the Ala Wai Canal to the east, the Ala Wai Yacht Harbor to the north, the Pacific Ocean to the west, and Kapahulu Avenue to the south form the boundaries of the promenade. The Kapiolani Akahi would border the promenade fronting the western segment of the Ala Wai Canal.

The Waikiki Special District identifies three gateways into Waikiki in the Hobron area—Kalakaua Avenue at Ala Wai Boulevard, Kalakaua Avenue at Ala Moana Boulevard, and the Ala Moana Bridge over the Ala Wai Canal. City planners recommend that these gateways receive special design considerations for open space and architectural treatment. The Kapiolani Akahi does not front on any of these gateways although it is near the Ala Moana Bridge gateway.

C. Socio-Economic Conditions

1. Population and Housing

The 2000 Census enumerated 5,607 people residing in the Hobron Lane area of Waikiki (Census Tract 19.02). The total resident population of Waikiki has been reported at 19,720 persons (See Wilson Okamoto, 2000). Comparing the census data for Census Tract 19.02 and the Waikiki population indicates that more than one-fourth of the Waikiki residential population (28%) resides in the Hobron Lane area.

The Hobron Lane population is housed in 4,571 dwelling units of which 3,354 are renter occupied (73%). The average household size for all units is 1.71 persons. With respect to age, about 30% of the population is 62 years and older.

2. Comparable Group Living Facilities

A marketing study for the Kapiolani Akahi (Senior Living Valuation Services, 2003) identified four projects either existing or under construction in Hawaii as being comparable to the subject project. Comparability is based on all projects being entry fee based, that is, people pay an entry fee for an independent living unit, which also entitles them to future health care. The two existing projects are Arcadia and One Kalakaua and those under construction are Hale Nohona (See Note under Table 2) and Kahala Nui. Information about these projects is summarized in Table 2.

Because the Kapiolani Akahi also includes a skilled nursing health center (33 beds), local nursing homes were also evaluated. The surveyed nursing homes are relatively older but are generally well regarded projects with high private pay rates. The homes surveyed included Arcadia Retirement Residence (60 beds/10 Alzheimer), Maunalani SNF (101 beds), Beverly Manor Convalescent Center (108 beds), Pearl City Nursing Home (122 beds), and Pohai Nani Care Center (42 beds/11 Alzheimer). Both the Arcadia and Pohai Nani are part of larger retirement projects.

Table 2
Hawaii Comparable Entry Fee Facilities

Name	Year Built	Total Ind. Living	Beds		Reported Occupancy
			Skilled Nursing	Assisted Living	
Arcadia	1967	250	60	11	100%
One Kalakaua	1997	166	32	0	95%
Hale Nohona	2004	184	0	0	0%
Kahala Nui	2005	270	60	63	80%

(Presales of ILU)

Note: Hale Nohona is included in the text and Table 2 so as not to alter the contents of the marketing study. Plans for this group living facility have been dropped.

Source: Senior Living Valuation Services, Inc., 2003.

The report also identified major senior rental housing projects on Oahu that provide congregate, assisted living or Alzheimer's care. These projects included Hawaii Kai, Pohai Nani, and The Ponds at Punaluu. There is no entry fee into these projects but a monthly rental is assessed.

D. Public Facilities and Services

1. Circulation and Traffic

Ala Wai Boulevard and Hobron Lane are the two major streets passing the project site. Ala Wai Boulevard fronting the project site consists of a single lane for traffic and a parallel parking lane in each direction. The street provides local access to residential apartments fronting Ala Wai Boulevard and vehicular access is only from the east, at the intersection of Ala Wai Boulevard and Lipeepee Street. The street is fully improved with curbs, gutters, sidewalks, and planting strips on both sides. On-street parallel parking is permitted on both sides of the road. Ala Wai Boulevard ends approximately 175 to the west of the project site fronting the Harbor View Plaza condominium. At its intersection with Kalakaua Avenue to the east of the project site, traffic movement is controlled by a signalized intersection. Only right-turns onto Kalakaua Avenue from Ala Wai Boulevard are permitted at the intersection. The posted speed limit is 25 mph. Existing traffic volume is very light, estimated to be less than 1,000 vehicles per day.

Hobron Lane fronting the project site has a single lane and a parallel parking lane in each direction. To the east, Hobron Lane intersects with Lipeepee Street at a three-way intersection with all approaching traffic controlled by stop signs. Hobron Lane is fully improved with curbs, gutters, and sidewalks. Limited on-street parallel parking is provided on both sides. The posted speed limit is 25 mph.

A traffic count taken in August 1999 showed a daily volume of 13,200 vehicles entering the intersection, with 4,347 vehicles per day on Hobron Lane, eastbound. To the west, Hobron Lane forms a four-way intersection with Ala Moana Boulevard; this intersection is controlled by a traffic signal system. A count taken in July 1994 near Ala Moana Boulevard showed volumes of 5,144 vehicles per day eastbound and 7,340 vehicles per day westbound. Traffic volume on Ala Moana

Boulevard at the nearby Ala Wai Bridge totaled 50,000 vehicles per day in a count taken in August 2001.

Morning peak hours in the area typically occur from 7:00 AM to 8:00 AM on the major streets and 8:00 AM to 9:00 AM on the local streets. Afternoon peak hours vary by location but occur between 3:45 PM and 6:00 PM. Table T-1 shows data from counts of existing traffic in the area.

2. Water

Municipal water service is available from a 12" water main along Ala Wai Boulevard or an 8" water main along Hobron Lane. Fire flow is provided by fire hydrants located on Ala Wai Boulevard and Hobron Lane.

3. Wastewater

Wastewater flow can be discharged into 8" sewer lines in Ala Wai Boulevard or Hobron Lane. The 8" lines connect to a 12" sewer main in Ala Moana Boulevard that conveys wastewater *to the City's Fort DeRussy Wastewater Pump Station, where it is then pumped* to the Ala Moana [Sewage] Wastewater Pump Station [for pumping] *and then on* to the Sand Island Wastewater Treatment Plant (*Department of Environmental Services Comment*).

4. Protective Services

Police service originates from the main station on Beretania Street. The Police Department also operates a Waikiki Sub-station on Kalakaua Avenue near Kuhio Beach. The Sub-station has been operational since 2001.

Fire protection for this part of Waikiki originates from the Waikiki Fire Station located at the corner of Kapahulu Avenue and Paki Street/Ala Wai Boulevard, about 2 miles away from the project site. Station 2 at the corner of Kaheka and Makaloa Streets can be summoned for back up about .75 miles away.

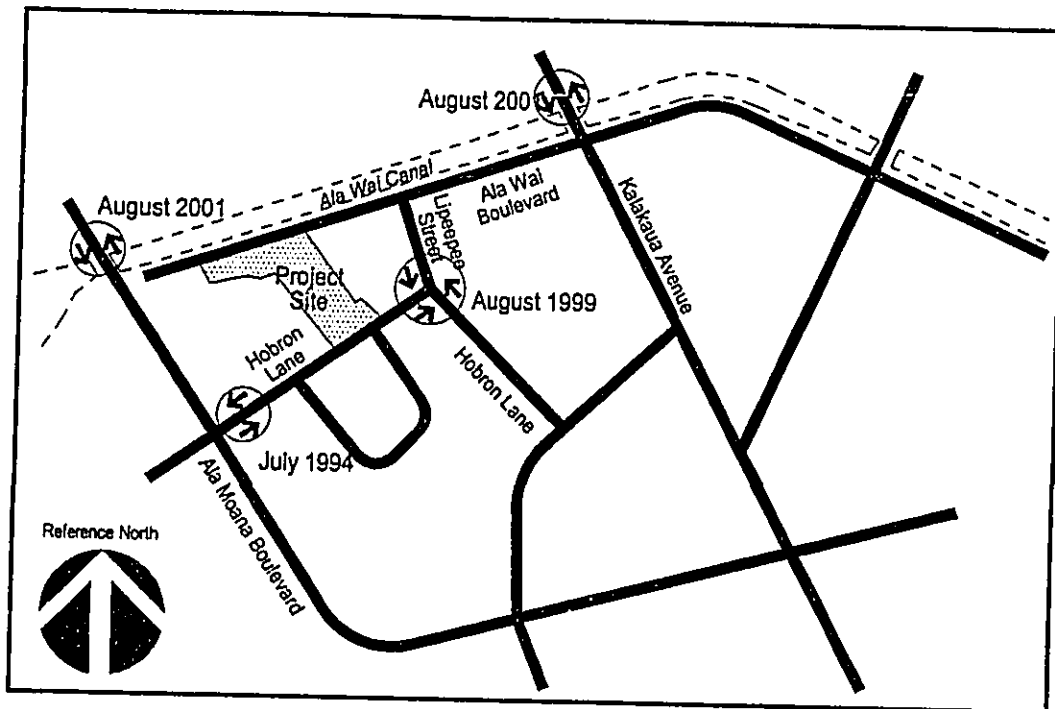
5. Medical Services

The Kapiolani Akahi is located within two miles of four of the State of Hawaii's major hospitals--- Queen's Hospital, Straub Hospital, Kapiolani Hospital for Women and Children, and the Kaiser Permanente Honolulu Clinic. Physicians' offices are located throughout Honolulu.

6. Recreation

Public recreation opportunities and facilities for an array of recreational activities are provided throughout Waikiki. These include Sans Souci, Queen's Surf, Kuhio, and DeRussy Beaches, Kapiolani Park, and the Ala Wai Canal. The Ala Wai Yacht Harbor, Ala Moana Beach Park, and Ala Wai Golf Course are just on the outer edges of Waikiki but in close proximity to the Kapiolani Akahi.

Table T-1
Existing Traffic



		Daily	AM Peak Hour	PM Peak Hour
Ala Moana Boulevard at Ala Wai Bridge	Northbound	26,365	1,620	2,025
	Southbound	23,638	1,176	1,718
Kalakaua Avenue at Ala Wai Bridge	Northbound	18,348	1,213	1,102
	Southbound	23,651	1,192	1,760
Hobron Lane east of Ala Moana Boulevard	Westbound	7,340	597	509
	Eastbound	5,144	168	426
Hobron Lane at Lipeepee Street	Eastbound	4,347	233	313
	Northbound	1,817	87	91
Lipeepee Street at Hobron Lane	Southbound	7,006	441	540

Sources: City and County of Honolulu Department of Transportation Services, State of Hawaii Department of Transportation Highways Division

3 RELATIONSHIP TO LAND USE PLANS, POLICIES, AND CONTROLS

A. State Land Use Law

All land in the State of Hawaii is classified Urban, Agricultural, Conservation, or Rural by the State Land Use Commission pursuant to Chapter 205, the Hawaii Land Use Law. The Kapiolani Akahi site is located in the State Land Use Urban district. The respective counties regulate land uses in the urban district. Thus, the use of the project site is under the jurisdiction of the City and County of Honolulu and its land use policies and controls.

B. General Plan

Waikiki is part of the Primary Urban Center designated by the General Plan (adopted in 1977 and amended in 1992) for the City and County of Honolulu. The Plan is "a statement of the long-range social, economic, environmental and design objectives for the general welfare and prosperity of the people of Oahu." The Plan is also "a statement of the broad policies which facilitate the attainment of the objectives of the Plan." These policies are expressed in eleven functional areas that cumulatively reflect the comprehensive planning process for the City and County of Honolulu and all aspects of the health, safety, and welfare of all the people of Oahu. Relevant General Plan objectives and policies and their relationship to the proposed project are identified below.

Economic Activity

Objective B To maintain the viability of Oahu's visitor industry.

- Policy 2 Provide for a high quality and safe environment for visitors and residents in Waikiki.
- Policy 3 Encourage private participation in improvements to facilities in Waikiki.
- Policy 4 Prohibit major increases in permitted development densities in Waikiki.

Comment: The Kapiolani Akahi is planned to provide a quality and safe residential complex for seniors desiring to live independently and a place that can care for them in their later years. Similar projects are being proposed in the Kahala and Hawaii Kai communities but there is no development of this kind proposed in Waikiki.

Construction will be financed through private funds. In the long-term, the project will be capitalized through an \$80 million dollar bond fund thus injecting outside money into the local economy.

The proposed development will help to revitalize one of the older, antiquated neighborhoods in Waikiki. The Hobron area has served the housing needs of the community for many years. Low-rise, low-density apartment uses in the area once were plentiful and a source of inexpensive rentals. The project site, for example, once accommodated 212 rental units. Perhaps as a result of municipal development policies in Waikiki, the marketing of Waikiki as a tourist destination, the increase in land values, and the growth in high-density living and working environments, the Hobron area is slowly being transformed into a high-rise, high-density neighborhood. The Kapiolani Akahi would be one of the projects contributing to this transformation.

Natural Environment

Objective A To protect and preserve the natural environment.

- Policy 7 Protect the natural environment from damaging levels of air, water, and noise pollution.

Policy 9 Protect mature trees on public and private lands and encourage their integration into new developments.

Comment: With the exception of short-term construction related impact, the project is not anticipated to be a source of long-term air, noise, and water pollution.

On-site trees will be removed prior to construction and may be incorporated into the project landscaping.

Housing

Objective A To provide decent housing for all the people of Oahu at prices they can afford.
Policy 3 Encourage innovative residential development which will result in lower costs, added convenience and privacy, and more efficient use of streets and utilities.

Policy 13 Encourage the provision of affordable housing designed for the elderly and the handicapped.

Comment: The project is the first CCRC project to be proposed in Waikiki. The project would increase the housing inventory in Waikiki by 122 residential units. The CCRC concept will provide seniors an option with regards to their life style in the immediate term and health care needs in the long-term.

The project will not require the construction of new streets and excessive extension of utility services.

Physical Development and Urban Design

Objective A To coordinate changes in the physical environment of Oahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.

Policy 2 Coordinate the location and timing of new developments with the availability of adequate water supply, sewage treatment, drainage, transportation, and public safety facilities.

Policy 5 Provide for more compact development and intensive use of urban lands where compatible with the physical and social character of existing communities.

Objective B To develop Honolulu (Waialae-Kahala to Halawa), Aiea and Pearl City as the Island's primary urban center.

Policy 3 Encourage the establishment of mixed-use districts with appropriate design and development controls to ensure an attractive living environmental and compatibility with surrounding areas.

Policy 5 Encourage the development of attractive residential communities in downtown and other business centers.

Comment: The proposed project is consistent with General Plan policies to promote development in the Primary Urban Center. The project is planned on a 3-acre lot in Waikiki that has been vacant for about 5 years. The Kapiolani Akahi would be the first congregate living facility to be built in Waikiki.

It should be recognized that the Kapiolani Akahi would be the last home for its residents. One of the purposes of the project is to provide an environment conducive to the prestige and self-respect due the elderly. The planned in-house facilities and activities, the plentiful landscaping and grounds for outdoor activities, the proximity to

Waikiki, parks, beach parks, and shopping areas come together to help achieve this purpose.

It is believed that the Kapiolani Akahi, would be a fine architectural addition to the area. Although close to 300 feet in height, the tower is no taller than towers on adjoining properties. And given the size of the lot and the number of residential units, the unit/acre density is less than adjoining high-rise developments.

On site landscaping would be an attractive improvement to the neighborhood. Landscaping would also help to screen the lower levels of the tower, podium, and parking lot from adjoining lots and roads. The screening is required pursuant to LUO Section 21-4.70-1 (d) which requires group living facilities to be screened from adjacent zoning lots by a 6-foot high solid wall or 6-foot high screening hedge.

Objective E To create and maintain attractive, meaningful, and stimulating environments throughout Oahu.

Policy 4 Require the consideration of urban-design principles in all development projects.

Policy 6 Provide special design standards and controls that will allow more compact development and intensive use of lands in the primary urban center.

Policy 8 Preserve and maintain beneficial open space in urbanized areas.

Comment: The project is designed to comply with the provisions of the Waikiki Special District with respect to setbacks, open space, density, and building height and the program requirements needed for the residential and health care needs for the intended population. In total, it is believed that the proposed Kapiolani Akahi CCRC will help to attain the objective for its intended clients, the neighborhood where it is located, and the community it will serve.

Culture and Recreation

Objective D To provide a range of recreational facilities and services that are readily available to all residents of Oahu.

Policy 9 Require all new development to provide their residents with adequate recreation space.

Policy 10 Encourage the private provision of recreation and leisure-time facilities and services.

Comment: As a multi-family development, the Kapiolani Akahi project would be subject to the Park Dedication Ordinance No. 4621, City and County of Honolulu. A private on-site park will be provided to comply with the park dedication requirements.

The project also provides in-house recreation and social facilities for use by residents and their guests.

C. Primary Urban Center Development Plan

The City and County of Honolulu's Development Plan program provides a relatively detailed framework for implementing the objectives and policies of the General Plan. Initially eight development plans were adopted covering the entire island. The development plans consist(ed) of Common Provisions applicable to all development plan areas, Special Provisions applicable to each development plan area, Land Use Map, and Public Facilities Map.

Beginning in 1997, the development plans have been replaced by Sustainable *Communities* Plans in [seven] *six* of the eight development plan areas. *The adopted Central Oahu DP retains the Development Plan designation.* The development plan area without an adopted [Sustainable

Communities] Development Plan is the Primary Urban Center. The primary urban center embraces the communities from Waialae-Kahala on the east to Pearl City on the west. Waikiki, and thus the project site, is located in the Primary Urban Center. A Draft *[Sustainable Communities] Primary Urban Center Development* Plan was published in May 2002 (Department of Planning and Permitting) but has not yet been adopted.

The Special Provisions for Waikiki are summarized below.

Waikiki. Waikiki is the area generally bounded by the Ala Wai Canal, the shoreline, Kapahulu Avenue, and includes the Ala Wai Golf Course, Ala Wai School, and Ala Wai Park. It contains major concentrations of resort, commercial, and apartment uses. The intent of the following statements is to enhance the attractiveness and quality of Hawaii's primary tourist destination and its residential areas.

(A) In general, resort and related commercial activities shall be concentrated in the areas makai of Kuhio Avenue and Ala Moana Boulevard. Apartments intended for Honolulu's residents who prefer a higher density urban living environment shall be located mauka of Kuhio Avenue and in the Hobron Lane area.

(E) Existing views of the mountains, ocean and Diamond Head from streets, pedestrian corridors and major public places shall be preserved through more stringent development controls in terms of height, bulk, siting and setback. Such views shall be enhanced by appropriate landscaping requirements for private developments along view corridors and the appropriate landscaping of related streets.

(Q) The Ala Wai Canal and adjacent area is an important natural, recreational, and open space resource to be protected, preserved and enhanced for its scenic, environmental, and recreational qualities.

(T) A viable residential community shall be supported in Waikiki and a compatible mixture of resident and visitor activities shall be permitted so as to preserve the integrity of residential communities.

Comment:

The proposed project is consistent with and supports the General Plan objectives and policies outlined previously and the Primary Urban Center Development Plan Special Provisions for Waikiki. The project is proposed in an area of Waikiki planned for high-density urban living and in need of redevelopment. The project is proposed as a congregate living facility for seniors (persons aged 62+ years). At this time, there is no congregate living facility to be built in Waikiki comparable the Kapiolani Akahi. Health care facilities may be constructed as part of that project at a later time. The Kapiolani Akahi introduces a new type of elderly housing to an area where residential apartments and condominiums are the prevalent housing type.

The Kapiolani Akahi has been sited on the properties to minimize its impact on existing views of the mountains (as viewed from buildings on the south) and its views towards Waikiki (as seen from buildings on the north).

The project would not encroach into the Ala Wai Canal view corridor and ample setbacks are provided along its frontage on Ala Wai Boulevard.

D. Land Use Ordinance and Waikiki Special District

The project site is located within the Waikiki Special District ("WSD") as shown in Figure 16. The WSD was created in 1976 to preserve and enhance the character of Waikiki and to maintain a balance in Waikiki's mix of resort, commercial, residential and recreational use. It was essentially a planning tool for controlling apartment, commercial, and hotel density in Waikiki. Its enactment came

in an era when development in Waikiki created a myriad of planning issues over density, availability and cost of public infrastructure to accommodate additional density, vehicle and pedestrian circulation, public access to beaches, and the visual impacts of development on the community.

The WSD Ordinance was amended in 1996 and is the major regulatory tool for controlling development in Waikiki. It sets forth 14 objectives that reflect the City's commitment to guiding, protecting, and enhancing the economic, social, and physical well being of Waikiki, a major world tourist destination. In operational terms, the Ordinance provides tools including zoning precincts, development standards, and design controls that generally are more stringent than similar tools applicable to the rest of Oahu.

The Kapiolani Akahi site is located within an Apartment Precinct of the WSD (See Figure 16). The Land Use Ordinance defines the proposed use as a group living facility and permits group living facilities in the apartment precinct as a conditional use (Table 21-9.6 (A)).

A Conditional Use Permit and a Waikiki Special District Permit Major will be required for the Kapiolani Akahi to be built and operated as planned. A Waikiki Special District Minor Permit may be required for the removal of trees with a caliper over 6 inches in diameter.

E. Special Management Area

The Kapiolani Akahi project site is located entirely outside the boundaries of the City and County of Honolulu's Special Management Area ("SMA") for west Waikiki. A Special Management Area Use Permit is not required to build the project.

F. Conditional Use Permit

Group living facilities are permitted in the Apartment precinct as a conditional use and a Conditional Use Permit will be required. An application for a Conditional Use Permit will be submitted after the completion of the environmental review process.

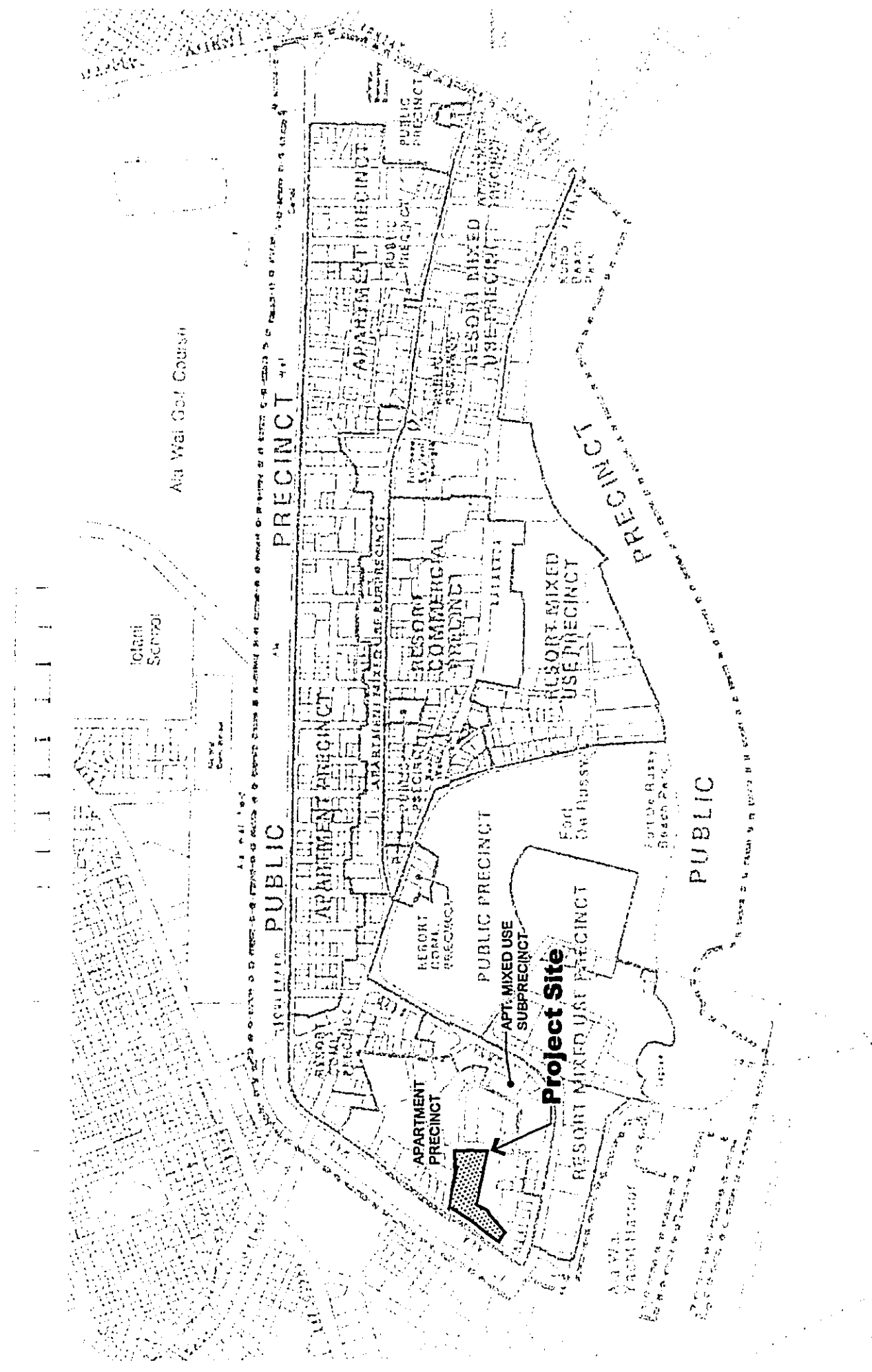


Figure 16
Waikiki Special District Zoning Precincts
Kapiolani Akahi CCRC

City & County of Honolulu
 Waikiki, Island of Oahu
 NORTH

LINEAL SCALE (FEET)
 0 250 500 750 1000

Waikiki, Island of Oahu

Gerald Park
 Urban Planner
 July 2007

LEGEND

- WAIKIKI SPECIAL DISTRICT BOUNDARY
- USE PRECINCT BOUNDARY

Source: City & County of Honolulu

SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS AND MEASURES TO MITIGATE ADVERSE EFFECTS

A. Assessment Process

The scope of the project was discussed with the agent for the landowner, consulting architect, members of the design team, and staff of the Department of Planning and Permitting. State and County agencies were contacted for information relative to their areas of expertise. Time was spent in the field noting site conditions and conditions in the vicinity of the project. The sum total of the consultations and field investigations helped to identify existing conditions and features that could affect or be affected by the project. These conditions include:

- The building site is vacant;
- The project area was filled with material dredged to create the Ala Wai Canal;
- There are no rare, threatened, or endangered flora or fauna on the property;
- There are no recorded archaeological or cultural resources on the property;
- The property is not located in a flood hazard zone;
- The property is not located in a coastal high hazard area or tsunami inundation area;
- The presence of on-site hazardous substances has been reported;
- Existing water, wastewater, drainage, and utility systems are available to serve the proposed project; and
- City land use plans propose high-density development for the Hobron area.

B. Anticipated Short-term Impacts

Site work is a necessary function to prepare the land for building the temporary and permanent improvements to follow and is probably the most disruptive construction activity on the environment. Site work is a persistent source of fugitive dust. Site contractors are aware that dust is a nuisance to both workers and people living near work sites and it is imperative for them to maintain stringent dust controls. Water sprinkling is probably the most effective dust control measure given the size of the building site and the scale of proposed improvements. The Contractor, however, may choose to implement other measures based on their experience with similar projects, physical conditions, and job sites. Air pollution control measures will comply with Chapter 60.1, Air Pollution Control regulations of the State Department of Health.

The Contractor will be responsible for general housekeeping of the site and for keeping adjacent streets and properties free of dirt, mud, and construction litter and debris.

Construction noise, like fugitive dust, cannot be avoided. Exposure to noise, however, is expected to vary in volume, frequency, and duration. Noise will vary also by construction phase, the duration of each phase, and the type of equipment used during the different phases. For this project, noise will be most pronounced during the early stages when the building site is grubbed of vegetation and foundation work started. Because of the underlying soil conditions, the buildings will be supported on pile caps.

Rather than driving piles to form the pile caps, a caisson system is proposed. Under this system, shafts will be drilled into the ground, reinforcing steel lowered into the shaft, and then filled with concrete. This system is significantly quieter than driving piles but costlier. This phase of the work is anticipated to take 2-3 months and includes time for equipment mobilization and demobilization.

Community Noise Control regulations establish a maximum permissible sound level for construction activities occurring within various zoning districts. Multi-family residential use is placed in the Class B zoning district and the maximum permissible sound level is 60 dBA between the hours of 7:00 am

and 10:00 pm (Chapter 46, Community Noise Control, 1996). Construction activities often produce noise in excess of the permissible daytime noise level and a noise permit (or variance) will be needed. The Contractor will be responsible for obtaining the permit and complying with conditions attached to the permit. Work will be scheduled for normal working hours (7:00 am to 3:30 pm) Mondays through Fridays.

Site work will expose soil thus creating opportunities for runoff and erosion. The site is relatively flat and site work will involve excavating, grading, and trenching. Earthwork will be performed in accordance with the Revised Ordinances of Honolulu, 1990, as amended and the Rules Relating to Soil Erosion Standards and Guidelines. Best Management Practices (BMPS) for erosion and drainage control during construction will be prepared for review and approval by the Department of Planning and Permitting.

The presence of a high water table will require dewatering for the building foundations extending below the water table and pile supports. Dewatering activities will be performed with dewatered fill and other constituents detained on-site. Water will be pumped to detention basins and allowed to evaporate. Alternatively water may be pumped into tanker trucks for off-site disposal. Solids will be disposed of off-site. An NPDES Permit will be required from the State Department of Health prior to any dewatering activity pursuant to Chapter 54, Hawaii Administrative Rules.

The hazardous conditions and materials identified during the Phase I Environmental Site Assessment (and summarized in Section 2 of this Assessment) can be remediated by adhering to EPA and State Department of Health guidelines and procedures. Containers with hazardous chemical-containing substances shall be properly disposed. Hawaiian Electric Company will be contacted to determine possible PCB content in the electrical transformers and electrical switch box. Prior to demolishing the corrugated metal shed and parking shed/storage building, all potential hazardous materials will be removed by a licensed hazardous materials contractor. Refrigeration equipment containing chlorofluorocarbons (CFCs) as a refrigerant shall be removed and properly transported for disposal. The oil spot identified on the property will be properly characterized for any potential contamination and to determine the appropriate method of disposal.

Subsurface archaeological and cultural features should not be encountered because the project is proposed on fill land. [Ground disturbing activities shall comply with the archaeological monitoring plan provisions.] *After consulting with staff of the State Historic Preservation Division, Honolulu Neighborhood Housing Services, Inc. will conduct an archaeological inventory survey of the parcel. If cultural deposits, subsurface artifacts, or human remains are unearthed, Applicant will adhere to the protocol procedures established by the State Historic Preservation Division.*

Applicant will also provide archaeological monitoring during trenching, excavating, and boring activities associated with ground disturbances.

Adverse effects on flora are not anticipated. None of the trees and plant materials observed on the property is indigenous to the area and listed or proposed for rare, threatened, or endangered status.

Work in Hobron Lane and Ala Wai Boulevard will be required to connect infrastructure and utilities and to construct new driveways. A traffic management plan will be prepared and submitted to the Department of Planning and Permitting for review and approval. Mitigating measures in the plan may include but are not limited to:

- Posting notices alerting residents and motorists of scheduled road work.
- Posting warning signs on both sides of the work area to alert motorists of construction and to slow traffic speed.
- Positioning traffic cones or other directional devices in the roadway to guide vehicles around work areas.
- Posting flagmen for traffic control.

- Keeping at least one traffic lane open at all times to minimize inconveniences to motorists.
- Limiting road construction to between 8:00 AM and 3:00 PM, Monday through Friday.
- Covering open trenches with steel plates during non-working hours and posting safety devices with warning lights to alert motorists of the construction area.

The possibility of working at night to make the utility and infrastructure connections is also an option. Although costlier, night work would aid in minimizing impacts on daily traffic flow in the project area.

Construction vehicles hauling men and material will contribute to traffic on streets leading to and surrounding the project site. These streets include sections of Ala Moana Boulevard, Kalakaua Avenue, Ala Wai Boulevard, and Hobron Lane. Material deliveries will be scheduled during non-peak traffic hours to minimize impacts on local traffic. Construction material will be off-loaded and stockpiled on-site; however, should materials need to be unloaded within the road right-of-way, flagmen will be posted for traffic control. When this occurs, traffic delays can be expected but should not last for more than a few minutes.

The construction of the Kapiolani Akahi will require a budget of approximately \$39 million. This is a significant infusion of capital into the local economy although most of the benefits will accrue to the construction industry. The amount includes the cost of purchasing direct and indirect labor, materials, shipping, and all professional services associated with the project. An estimated 300 to 400 persons (the vast majority of them being tradesmen) will be employed directly on-site at various times over the one-year construction period. Indirectly, the budget also will pay for off-site administrators and construction managers of companies providing the labor. Labor purchases will also contribute tax dollars to federal and state governments in the form of payroll deductions.

The owner/sponsor, Honolulu Neighborhood Housing Services, Inc. ("HNHS") is a 501-c-3 corporation. HNHS is exempt from the State of Hawaii General Excise tax of 4.16% on all project costs.

C. Anticipated Long-term Impacts

The Kapiolani Akahi would provide an independent living environment for seniors desiring this type of lifestyle, accommodations, and future nursing care, essentially achieving the purpose and need for the project. Residents of the Akahi would purchase their unit and reside therein until the time when they cannot care for themselves and health care services are the only option to independent living. They can then move into the one of the health care units where they would receive nursing care. At this time, the alternatives available to seniors are limited to other CCRCs, senior rental apartments, senior residential housing projects, intermediate and long-term care facilities, and in-home care. Health care and services generally must be sought or provided separately.

A marginal impact on population and the housing inventory in Waikiki is anticipated. No other senior congregate living facility is planned for Waikiki at this time. A future Kapiolani Akahi population was approximated based on the number of independent living units and the health care beds. It is assumed that 60% of the resident population would be couples and 40% singles. Applying these percentages to the number of residential units yields an estimated population of 195 seniors.

The health care units of the Kapiolani Akahi also would accommodate a patient population. The health care units/beds will first be made available to Akahi residents. If residents do not fully occupy the facility (which will be the case in the early to middle years of the project), the assisted living, alzheimer/dementia care, and nursing components will be marketed to the general public/direct admits. Based on the number of health care beds (73) a potential population of up to 73 seniors can be accommodated at one time. In total, the Kapiolani Akahi could house a senior population ranging between 265-275 persons.

The addition of 122 living units would make a small contribution to the total number of dwelling units in Waikiki. The addition of 73-health care beds appears to be a first for Waikiki as no other comparable project with patient beds are under construction at this time.

Daily, on-going residential and operational activities will generate noise and discharge air pollutants. Delivery vehicles, private automobiles, recreational sounds, and maintenance noise can be expected during daylight hours when most activities at the Akahi will take place. During evening hours, noise will diminish to levels experienced in most nearby residential apartments and condominiums. Nighttime social activities will be limited to certain hours with most activities ceasing by 10:00 PM. Air conditioning equipment will be screened or enclosed to mitigate adverse noise effects on adjoining properties. The landscaping should also aid in noise attenuation.

Ambient air quality should not be adversely affected in the long-term. The principal source of air pollution is expected to be exhaust emissions from vehicles going to and from the site and vehicles passing the site. Exhaust emissions will be disbursed by the prevailing trade winds without adverse effects. On occasion, cooking odors from the congregate kitchen may be detectable but will also be dispersed by the prevailing wind.

The project would provide employment for an estimated 140-150 persons in health care, housekeeping, food services, administrative, and maintenance services. Labor costs have not yet been estimated but the cost of labor would contribute to the State of Hawaii tax base primarily in the form of payroll taxes. The State would also derive tax revenues from the general excise tax levied on goods and services *provided by individual contractors* to support the operation of the Akahi.

HNHS is a 501-c-3 corporation and as such, the Kapiolani Akahi project will be considered tax exempt from City and County of Honolulu real property taxes. The application for tax exemption has been filed. HNHS is exempt from Federal and State income taxes and from the State of Hawaii General Excise Tax of 4.16% [on all project costs].

All residents of independent living apartments will be refunded 90% of the entry fee paid upon vacating their apartment. The refunds are primarily funded from the Entry Fee Revenue from the remarketing of the apartment.

The City's development plan and the Waikiki Special District Apartment Precinct designation propose a high-rise, high-density urban form. That this area of Waikiki is destined for high-rise high-density development is a given. As stated previously, development of the Kapiolani Akahi would be consistent with and supportive of City land use policies for the area. Although land use policies establish the desired urban form for the area, it is tools such as the Waikiki Special District ordinance (and its objectives, design guidelines and design controls) that help to embellish the overall design of the development and the area in which it is located.

The Kapiolani Akahi has been sited to fit the L-shaped lot. The podium and tower are oriented perpendicular to the Ala Wai Canal with appropriate setbacks and ample open space and landscaping. The 26-story high Kapiolani Akahi will alter the visual setting by replacing a large, vacant lot with a slender tower. The vacant lot also serves an open space function for low and high-rise buildings arrayed around the site.

It should be noted that the Waikiki Special District does not identify significant view corridors, view corridor streets, or panoramic views in the direction of the Koolau Mountains or the sea from the Hobron area. The ordinance does however identify gateway features at three street locations in the vicinity of the Hobron area. The Kapiolani Akahi is located a sufficient distance from the gateways and should not visually detract from any of the gateway improvements that would be planned.

The project would not affect the Ala Wai Canal view corridor. Aside from its drainage (and recreation function) the Canal creates a wide scenic waterway separating Waikiki on the south from the neighborhoods of Ala Moana, McCully, Kaimuki, and Kapahulu on the north. Ala Wai Boulevard,

which runs parallel to the Ala Wai Canal, also provides a tree-lined 75-foot wide buffer between Ala Moana Boulevard and Kalakakaua Avenue. The Kapiolani Akahi has been setback from Ala Wai Boulevard (and hence the Ala Wai Canal) at ground level. Without the setback, the property is approximately 100 lineal feet from the edge of the Canal. The exterior of the structure is further set back from Ala Wai Boulevard at 40-feet above grade and set back again at about the 230-foot level.

The perpendicular orientation to Ala Wai Boulevard maximizes views for residents and provides ample open space and landscaping at ground level. It is believed that the above grade building setbacks add architectural interest to the structure. The use of pitched roofs at the upper levels (rather than a flat roof) imparts a visual sense of an old-style Hawaiian type residential dwelling with its pitched roof and overhangs. Coupled with the planned landscaping and judicious use of tropical and native plant materials, the project should visually convey a Hawaiian sense of place.

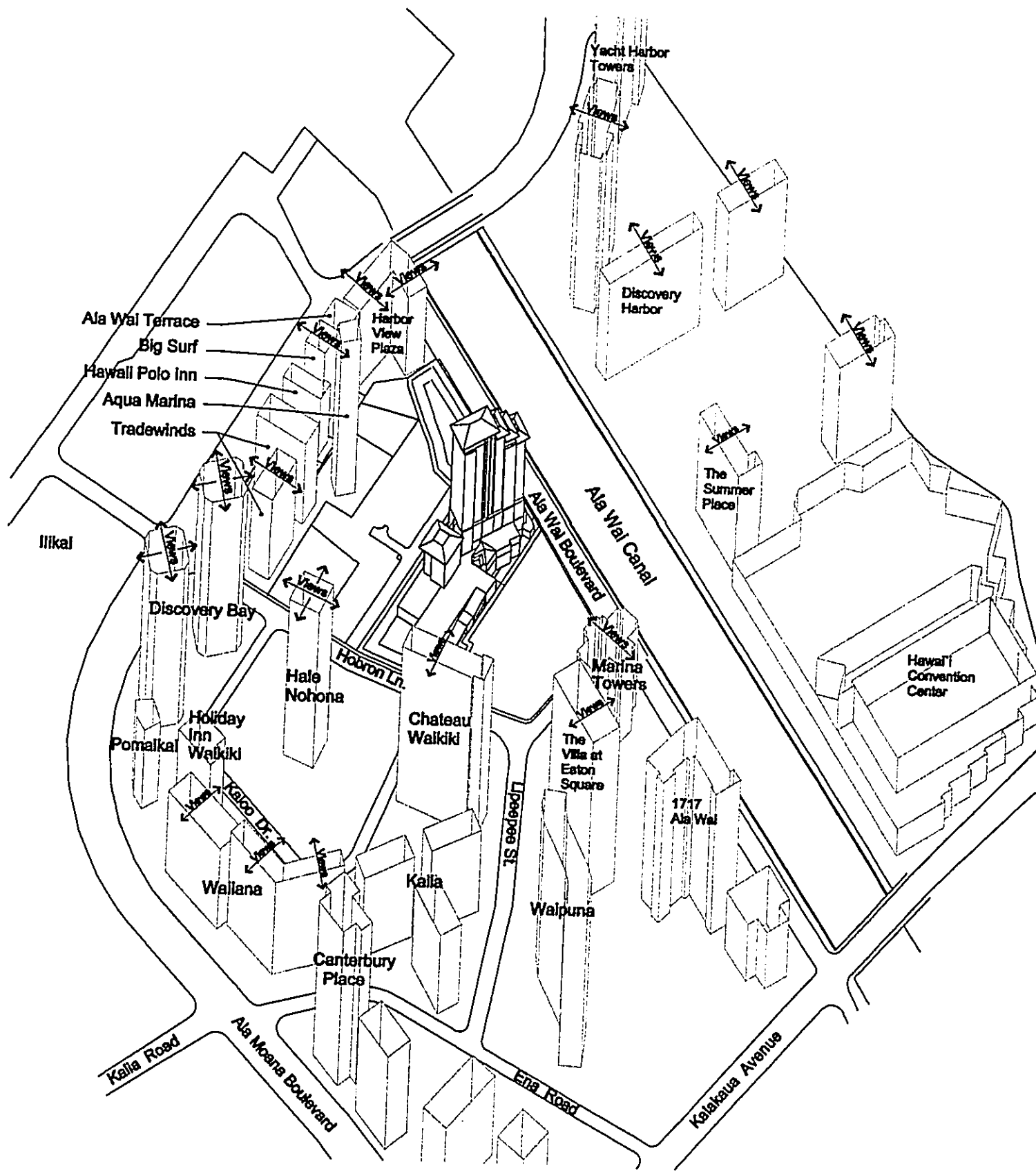
The building should not significantly affect **south facing views** from buildings located across the Ala Wai Canal. The Akahi would appear as a slender tower because of its perpendicular orientation to Ala Wai Boulevard (See Figure 12, Ala Wai Elevation). The view from units in the several tall structures adjoining the mauka side of the Ala Wai Canal is one where tall structures including the former Ohana Hobron Hotel, Discovery Bay, Chateau Waikiki, The Kalia, The Walluna, and the Villa at Eaton Square already obstruct views in a 180 degree arc in the direction of Waikiki.

The Akahi will **partially obstruct views** of Ala Moana Beach Park, Ala Wai Yacht Harbor, and the Pacific Ocean from units in several buildings located to the east of the Akahi (See Figure 17). Not all the buildings on the east side of the Akahi are sited to provide views of the ocean. Units in the Chateau Waikiki and Marina Towers (at Lipeepee and Ala Wai Boulevard) that have views across the subject properties would be most affected.

From the south side of the Kapiolani Akahi, the structure would obstruct some **mauka facing views** from high-rise units along Ala Moana Boulevard (for example Discovery Bay), Hobron Lane (Chateau Waikiki), and Ena Road (The Kalia), and Kaioo Drive (Hale Nohona). The Akahi would not completely obstruct views in the direction of the Koolau Mountains as sections of its south slope, ridges, and mountaintop would be viewable on either side of the tower (See Figure 18). The tower, however, would break up existing unobstructed panoramic views across the site from those units where this view now exists. To some degree, existing high-rises on the mauka side of the Ala Wai Canal and the many mid and high-rise structures dotting the skyline in the Pawaa and McCully areas already block views of the mountains as seen from the Hobron area.

The Akahi would partially obstruct **east-facing views** from buildings located on the west (Harbor View Plaza, Ala Wai Terrace, Big Surf, Aqua Marina, and the Tradewinds). Most units in these buildings have panoramic views of the Koolau Mountains and east Waikiki but existing high-rise towers in the immediate area and generally between Kalakaua Avenue and Ala Wai Boulevard obstruct distant views in the direction of east Waikiki (See Figure 18). Units in buildings closest to the Ala Wai Canal would be most affected by the orientation of the Kapiolani Akahi Tower. These units would lose panoramic views over the site but distant views of the mountains and east Waikiki would still be visible on either side of the Tower.

Landscaping will significantly **improve the appearance** of the site and views into the site. The proposed landscape treatment will add needed greenery to an otherwise drab street scene. Plantings would help to conceal ground level activities and general back-of-house functions. Palms and trees would help to break up the mass of the podium, parking structure, and shade the sidewalk and street. Flowering trees and plants will add color to the site and to the livelihood of the residents. Landscaping will also introduce indigenous plant materials to the neighborhood.

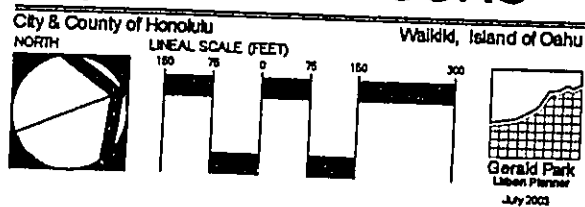


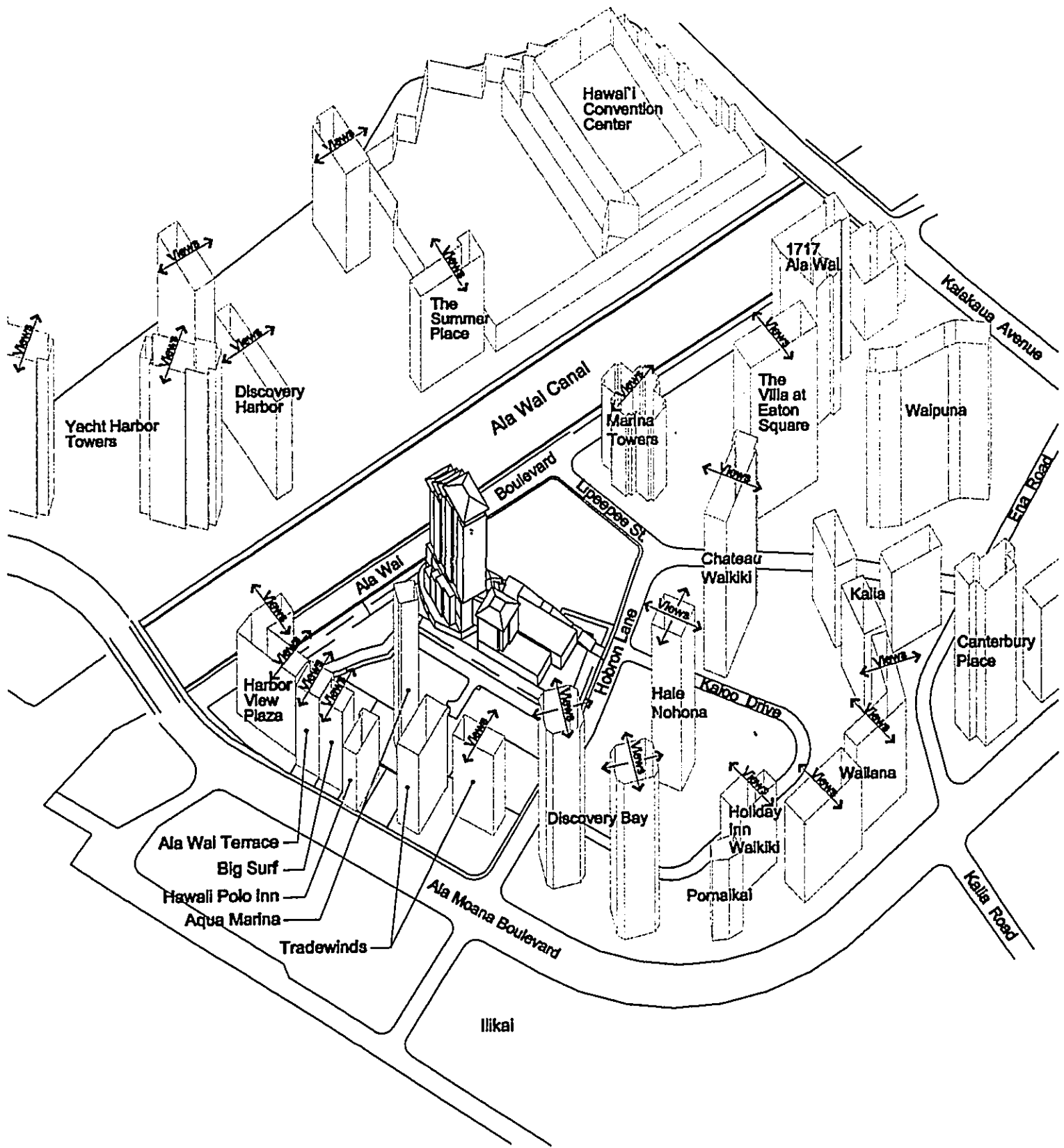
Legend

← Views → General View Direction

Source: Sam Chang Architects & Assoc., Inc., 2003

Figure 17
Axonometric View from East
Kapiolani Akahi CCRC





Legend

← Views → General View Direction

Source: Sam Chang Architects & Assoc., Inc., 2003

Figure 18
Axonometric View from South
Kapiolani Akahi CCRC

City & County of Honolulu Waikiki, Island of Oahu

NORTH

LINEAL SCALE (FEET)

150 75 0 75 150 300

Gerald Park
 Urban Planner
 July 2003

The project site is located on a city block that has been slow to realize its development potential. Lots along the western edge of the block fronting Ala Moana Boulevard have been developed for high density residential and some commercial activities. Similarly, lots along Ena Road and Hobron Lane have been improved with high-rise high-density structures. Over time the Kapiolani Akahi will appear as another tall building in a neighborhood where high-rise buildings are the norm.

The proposed Kapiolani Akahi CCRC will consist of 122 independent living units, a 14-bed assisted living unit, a 33-bed skilled nursing facility, and a 26-bed Alzheimer care facility. The project at completion will provide employment for approximately 134 persons and will be staffed 24 hours a day, 7 days a week.

Primary vehicular access will be through a single driveway to Hobron Lane; the driveway will serve a multi-level parking garage (about 150 parking spaces) and a ramp leading to a second level porte cochere. A sidewalk will be provided on the ramp for pedestrian access. Secondary vehicular access through a single driveway to Ala Wai Boulevard will be provided for a ground level service area (loading area and limited staff parking).

The independent living units are expected to be used by elder residents who will maintain an active lifestyle, but would not be commuting during peak travel hours. The assisted living, Alzheimer care, and skilled nursing facilities will generate traffic through service deliveries, employee arrivals and departures, and visitors. Trip generation factors that account for all traffic generated by similar uses were used to estimate the traffic from the proposed project. These rates are shown in Table T-2.

Table T-2
Trip Generation Rates

		Average Weekday	AM Peak Hour		PM Peak Hour	
			Rate	% entering	Rate	% entering
Nursing Home	Vehicle trips per employee	4.03	0.33	63%	0.48	26%
Elderly Housing - Attached	Vehicle trips per dwelling unit	3.48	0.07	63%	0.11	53%

Source: Institute of Transportation Engineers, *Trip Generation, 6th Edition*.

The proposed project is estimated to generate less than 1,000 vehicle trips per day; the highest hourly volume in the peak direction is estimated to be less than 55 vehicles per hour. Table T-3 shows the traffic generation estimates.

Table T-3
Traffic Generation

		Average Weekday	AM Peak Hour		PM Peak Hour	
			entering	exiting	entering	exiting
Care facilities	134 employees	540	28	16	17	47
Independent Living Units	122 dwelling units	420	5	4	7	6
TOTAL SITE TRAFFIC GENERATED		960	33	20	24	53

Source: Julian Ng, 2003.

The project **traffic impact** is minimal. The maximum impact is less than the guideline suggested by the Institute of Transportation Engineers that "a traffic access/impact study be conducted whenever a

proposed development will generate 100 or more *added* (new) peak direction trips to or from the site during the adjacent roadways' peak hours or the development's peak hour" (from *Traffic Access and Impact Studies for Site Development, A Recommended Practice, 1991*).

If all of the site-generated traffic were to use Hobron Lane, the additional volume would be less than 10% of the existing volume. Since vehicular access is provided from two sides, the project impact will be shared by Hobron Lane and Ala Wai Boulevard, further lessening any impact. The project traffic during existing peak hours in the area will be smaller than shown in Table 3 since most of the peak hour traffic generated by the site would be due to the care facilities. The projected employment includes three shifts, beginning and ending at 6:00 am, 2:30 PM, and 11:00 PM. Employee travel to arrive at or to depart from the site will not coincide with existing peak hours in the area. Also, deliveries can be scheduled to occur during off-peak hours.

The traffic generated by the proposed project will be less than other uses that could be developed on the site. For example, a high-rise apartment with 475 dwelling units could generate 2,000 vehicle trips per day with peak hourly volumes as high as 190 vehicles per hour in the peak direction.

The project would remove approximately 3 **on-street parking stalls** along Ala Wai Boulevard (and several coconut palms in the planting strip) and 3 parking stalls along Hobron Lane. The Department of Transportation Services proposes widening the sidewalk on Hobron Lane. Applicant will set back improvements in anticipation of the widening.

Water use is estimated at 39,000 gallons per day for domestic consumption (residents only) and irrigation. Quantities have not yet been calculated for the congregate/common area, accessory uses, and health care facilities. The Board of Water Supply has indicated that the municipal water system can supply the estimated daily flow. Applicant, however, will be assessed the appropriate facilities charges.

Wastewater flow from the residential units is estimated at 9,750 gallons per day. Wastewater will be discharged into the municipal sewer system and transmitted to the Sand Island Wastewater Treatment Plant for treatment and ocean disposal. The Department of Planning and Permitting [has] approved a Wastewater Connection for the project **on May 8, 2003**.

Domestic solid waste from the residential units is estimated at 430 pounds per day (3.5 pounds per dwelling unit). A private hauler will collect and transport solid waste to approved disposal facilities. Solid waste resulting from administrative and office functions has not been determined.

The **health care component** is projected to generate an estimated 1 cubic yard per day of infectious waste such as disposal diapers and dressings. Bio-hazardous waste such as sharps containers should not exceed 1 gallon per month. Medical waste will be collected by a private disposal company and transported for disposal at an approved medical waste disposal site.

Wet garbage from the congregate kitchen is estimated at 100 liquid gallons per day and does not include paper or plastic waste. The estimate is based on the assumption that wet garbage cannot be disposed of using garbage disposals and must be hauled away.

Comprehensive management procedures for various waste products such as green waste, solid waste, wet garbage, medical waste, and grease have yet to be developed. A primary health care provider has been selected but other on-site vendors have not. Once all vendors are selected, waste generation and disposal requirements can be determined collectively. Appropriate strategies and procedures for collecting, storing, processing, and disposing of (or recycling) different types of waste would then be promulgated (Response to Department of Environmental Services Comment).

Storm runoff to be generated by the Kapiolani Akahi would be higher in volume as compared to the runoff generated under existing conditions. The current City and County of Honolulu policy on storm water runoff mandates [no increase in runoff generation allowed and no net increase in pollutant loading when comparing existing (or pre-development) conditions to future (or developed) conditions.]

that changes in runoff as a result of proposed construction that have an adverse impact on City/private property will not be allowed (Department of Planning and Permitting Comment). Because the site is currently vacant, on-site generated storm runoff is minimal. Development will increase storm water by the addition of roofs and paved surfaces. To comply with City policy, it is proposed a) to direct storm water to open space areas for percolation into the ground; and b) provide an on-site detention system with controlled release to the municipal drainage in the project design. **The Department of Planning and Permitting also commented that permanent best management practices shall be incorporated into the drainage system such as installing inlet filters or filtering the runoff in landscaped areas prior to discharging it into the city drainage system.**

The project should not place additional demands on public recreation facilities and services. The availability of nearby municipal recreation facilities—a golf course, clubhouse, and beach parks—is a benefit for residents. Residents can also recreate, exercise, and enjoy the activities and programs offered at the Kapiolani Akahi that would be geared towards their recreational needs.

The project is not anticipated to place additional demands on protective services. The Honolulu Police Department regularly patrols the neighborhood and their presence will be supplemented by on-site security, 24 hours a day, 7 days a week.

Four major hospitals are located nearby for residents in need of medical treatment or hospitalization. Residents requiring skilled nursing, assisted living, and treatment for Alzheimer's disease or other forms of dementia will be cared for in the Akahi health care facilities.

A. No Action

The no action alternative would maintain the status quo of the building site and preclude the occurrence of all environmental impacts, short and long-term, beneficial and adverse described in this Assessment. The site would remain vacant until such time as another more economically feasible development is proposed. The benefits of providing independent living residential units and assisted care for a growing segment of the local population would be foregone.

B. Alternate Site Plan

An alternate site plan proposed locating the podium and tower on the lot parallel with Ala Wai Boulevard and the parking structure would be placed adjacent to the podium and set back from Hobron Lane. Primary access to the project would be taken from Hobron Lane. This proposal generally would have resulted in the same short and long-term impacts described in this environmental assessment with the exception of its impact to planned open space and views. This arrangement would create two open space areas. One would front on Hobron Lane and the other would be in the northwest corner of the lot adjoining the Harbor Vista condominium. Practical site planning dictates not breaking up a large open area into smaller areas unless necessary. Moreover, there is no open space along Hobron Lane that can compare with the open space on the other side of the property created by the Ala Wai Canal.

A building aligned east-west would present a slimmer building form from buildings located to the east and west of the proposed structure. Units in some of these buildings would maintain their views in the direction of the ocean, the mountains, and Diamond Head while some units would lose either portions of their existing views or their view entirely.

Generally there would be no loss of views in the direction of Waikiki from units in buildings across the Ala Wai Canal. Tall buildings to the south of the project site already obstruct these views.

Some units in buildings to the south of the site (Discovery Bay for example) would lose panoramic mauka views of the Koolau Mountain Range but the sections of themountain range would still be visible on either side of the Kapiolani Akahi tower.

It is difficult to ascertain whether an east-west building placement results in more significant visual impacts than the preferred layout. Public views over the subject property from the same building would be affected differently depending on the viewing location with respect to the orientation of the Akahi Tower.

C. Alternate Foundation Work

If concrete piles are used for creating the building foundation, then pile driving will be required. Typical noise levels produced by impact pile drivers at a distance of 50 feet ranges from about 95 dBA to 105 dBA and 87 to 99 dBA at 100 feet. Low and high-rise multi-family residences bound the project site and are considered to be noise sensitive properties by the Department of Health. To minimize pile driver noise, shafts can be pre-drilled to pre-determined depths and the pile lowered into the shaft. The pile driver would then drive the pile. This method would not eliminate noise completely but would minimize the duration to drive individual piles and the duration of pile driving noise. Pile drivers also can also be equipped with noise suppressors to help attenuate noise. Pile driving is expected to take 2 to three months depending on subsurface conditions. An additional month would be needed for mobilization and demobilization. Pile driving should not adversely affect the public health welfare and safety because of the temporary nature of this noise-producing activity.

The Contractor will be required to obtain a Noise Variance and adhere to the rules for Community Noise Control (Chapter 46, Hawaii Administrative Rules).

Pile driving also creates ground vibration that has the potential to cause damage to structures in the immediate vicinity of the project site. "Ground vibrations are generally described in terms of peak particle (or ground) velocity in units of inches/second. While people can feel ground vibrations as low as 0.01 to 0.04 inches/second, damage to structures would occur at much higher levels. The most commonly used damage criterion for structures is 2.0 inches/second, derived from the U.S. Bureau of Mines. A more conservative limit of 0.2 inches/second is also used, and is suggested for planning purposes for pile driving because of its repetitive nature, which can increase the risk of damage (Wilson Okamoto, 2003).

If piling is needed, test piles will be driven and structures adjoining the work area monitored for vibration. Based on the monitoring results, engineers should be able to determine whether pile driving in certain areas poses a high risk of structural damage to adjoining structures. Because vibration diminishes with distance, a spatial threshold would be established on the premise that the closer the adjoining structure, the higher the risk of vibration damage. If the 0.02 inches/second threshold is exceeded alternatives to pile driving or determining where piles should be located will be evaluated. In these situations, the caisson system may be appropriate.

Land use and construction permits required for the project and responsible authorities are identified below. Additional permits and approvals may be required depending on final construction plans.

<u>PERMIT/APPROVAL</u>	<u>AUTHORITY</u>
City and County of Honolulu	
Conditional Use Permit (Major-Group Living Facility)	Department of Planning and Permitting
Conditional Use Permit (Minor-Joint Development)	Department of Planning and Permitting
Special District Permit (Major)	Department of Planning and Permitting
Park Dedication	Department of Planning and Permitting
Grubbing, Grading, and Stockpiling Permit	Department of Planning and Permitting
Building Permit for Building, Electrical, Plumbing	Department of Planning and Permitting
Sidewalk/Driveway and Demolition Work	
Permit to Excavate Public Right-of-Way	Department of Planning and Permitting
Sewer Connection	Department of Planning and Permitting
Storm Drain Connection License	Department of Planning and Permitting
Certificate of Occupancy	Department of Planning and Permitting
Water and Water System Requirements for	Board of Water Supply
Developments	
Street Usage Permit	Department of Transportation Services
State of Hawaii	
Variance From Pollution Controls (Noise Permit)	Department of Health
NPDES Permits (Various)	Department of Health
Archaeological Monitoring Plan	State Historic Preservation Division

AGENCIES AND ORGANIZATIONS CONSULTED IN THE ENVIRONMENTAL ASSESSMENT PROCESS

*The Draft Environmental Assessment for the Kapiolani Akahi Continuing Care Retirement Community was published in the Office of Environmental Quality Control Environmental Notice of August 23, 2003 and September 8, 2003. Publication initiated a 30-day public review period ending on September 22, 2003. Copies of the Draft Environmental Assessment were mailed to the agencies and organizations identified below. An asterisk * identifies agencies and organizations that submitted letters or written comments during the review period. All comment letters and responses are found in Appendix A.*

City and County of Honolulu

- *Board of Water Supply
- Department of Community Services
- *Department of Environmental Services
- *Department of Facility Maintenance
- *Department of Parks and Recreation**
- *Department of Planning and Permitting
- *Department of Transportation Services
- *Fire Department
- *Police Department

State of Hawaii

- Department of Health
 - *Noise, Radiation and Indoor Air Quality Branch**
 - *Environmental Health Administration**
- Department of Land and Natural Resources
 - *Historic Sites Division
- Department of Human Services
 - *Department of Transportation**
 - *Office of Environmental Quality Control**
 - *Office of Hawaiian Affairs**

Others

- Councilmember Charles Djou
- Hawaiian Electric Company
- Hobron Hotel, LLC
- Oceanic Cable Television
- Outrigger Enterprises Inc.
- Verizon Hawaii Inc.
- Waikiki Improvement Association
- Waikiki Neighborhood Board No. 9
- Waikiki Residents Association
- Kapahulu-Waikiki Public Library (Placement)

- *Theodore K.R. Norman Jr.**
- *Mark Duering**
- *Barry and Barbara Feather**
- *Fleming and Hortense Carstensen**
- *Theodore Riese**

Pre-Assessment Consultation

Department of Planning and Permitting
Land Use Permits Division
Site Development Division
Traffic Review Branch

Department of Land and Natural Resources
State Historic Preservation Division

Chapter 200 (Environmental Impact Statement Rules) of Title 11, Administrative Rules of the State Department of Health, establishes criteria for determining whether an action may have significant effects on the environment (§11-200-12). The relationship of the proposed project to these criteria is discussed below.

- 1) **Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;**

Natural or cultural resources are not found on the property. The State Historic Preservation Division recommended that an Archaeological Monitoring Plan be prepared. A monitoring plan will be prepared and submitted to the State Historic Preservation Division for review and approval prior to construction.

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

The project site consists of two lots that have been vacant since 1998. Applicant is proposing to redevelop the properties in a manner that is consistent with City and County of Honolulu General Plan, Primary Urban Center Development Plan, Land Use Ordinance, and Waikiki Special District guidelines and standards.

- 3) **Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, Hawaii Revised Statutes, and any revisions thereof and amendments thereto, court decisions or executive orders;**

The project does not conflict with long-term environmental policies, goals, and guidelines of the State of Hawaii.

- 4) **Substantially affects the economic or social welfare of the community or State;**

In the short-term the project will provide an infusion of \$39 million for purchasing labor and materials to construct the project. The project is anticipated to employ approximately 300 to 400 workers during construction. Tax benefits would accrue to the State of Hawaii in the form of payroll taxes.

After construction is completed, it is estimated that approximately 140 to 150 persons would be employed on a long-term basis thus contributing to the labor base and payroll taxes. Job positions in health care, food service, security, housekeeping, and management will expand employment opportunities in those fields.

- 5) **Substantially affects public health;**

Public health will not be adversely affected *by the proposed project*. [The proposed project is a senior congregate living facility and will not contribute pollutants] *People residing near the project site may complain about Fugitive dust and noise generated during construction but can be mitigated by having the General Contractor adhere to applicable public health regulations.*

Medical wastes such as diapers, dressings, and biohazardous waste (sharps containers) will be collected by a private disposal company and transported for disposal at an approved medical waste disposal site.

6) Involves substantial secondary impacts, such as population changes or effects on public facilities;

The project would contribute a resident population to Waikiki in general and the Hobron area in particular. Preliminary estimates project a residential population between 190 and 200 persons and a health care population of 87 persons. The population would be comprised of persons aged 62 years and older.

City land use plans propose high-density development in the Hobron area. The Kapiolani Akahi is but one project that would help to implement the desired land use pattern. Water and wastewater facilities are already in place to accommodate the planned development.

7) Involves a substantial degradation of environmental quality;

Environmental quality will not be degraded. The Kapiolani Akahi is proposed on two vacant, undeveloped lots in the midst of a dense, highly developed neighborhood. The Hobron Lane area is proposed for high-rise, high-density development and the Kapiolani Akahi will contribute a well-designed, safe, and secure residential development for senior citizens to the area. The project is anticipated to improve the overall environmental quality of the properties on which it is to be built and the neighborhood in which it is located.

8) Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;

The project does not involve a commitment for larger actions.

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

Field surveys did not uncover rare, threatened or endangered flora or fauna on the premises.

10) Detrimentally affects air or water quality or ambient noise levels;

Air and water quality and ambient noise levels should not be adversely affected by the proposed project. Fugitive dust will be raised during site work activities but can be controlled by appropriate dust mitigation measures. Noise from construction equipment will be audible throughout the one year construction period. Most surrounding residential units are located well away from the actual building site and this distance should help to attenuate construction noise.

The completed project is not anticipated to adversely affect air and water quality in the long-term.

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 waters;

The Kapiolani Akahi is not proposed in an environmentally sensitive area.

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

The Waikiki Special District Ordinance does not identify scenic vistas or view planes in the direction of the Koolau Mountain Range and the sea from the Hobron area. Although the Kapiolani Akahi is located near a planned Waikiki gateway---at the Ala Moana Bridge over the Ala Wai Canal---it is sufficiently distant and should not adversely affect improvements that would be planned at this gateway.

13) Requires substantial energy consumption.

The Kapiolani Akahi will require electrical and gas energy to sustain its residential activities and health care operations. Electrical requirements will be determined during the design stage of the project.

REFERENCES

- Brewer Environmental Services. January 2003. *Phase I Environmental Assessment (TMK (1) 2-6-11: parcel 2 Lot 2 & Parcel 4 Lot 1, 352 and 362 Hobron Lane, Honolulu, Hawaii 96815. BES Project No. 02-1149. Prepared for Mr. Donald Graham, Graham Murata Russell, 345 Queen Street, Suite 400, Honolulu, Hawaii 96813.*
- Department of Community Services, Elderly Affairs Division, City and County of Honolulu. July 1999. *Four-Year Area Plan October 1, 1999-September 30, 2003.*
- Department of General Planning. 1992. *General Plan Objectives and Policies.*
- Department of Planning and Permitting. November 1981. *Primary Urban Center Development Plan Land Use Map and Public Facilities Map. Ordinance No. 81-79.*
- Department of Planning and Permitting, City and County of Honolulu. May 1999. *Land Use Ordinance (As Amended through Ordinance No 99-12).*
- Department of Parks and Recreation, City and County of Honolulu. April 1997. *Index of Oah'u Parks and Facilities.*
- Federal Emergency Management Agency. 2000. *Flood Insurance Rate Map, City and County of Honolulu. Community Panel No. 15001 120C.*
- Hobron Hotel LLC. July 2002. *Application for Group Living Facility Permit Under the Land Use Ordinance. Hobron Hotel, LLC Hobron Seniors' Group Living Facility, Residence Condominiums Tax Map Key: 2-6-12: 47.*
- Ng, Julian. June 2003. *Traffic Study for Kapiolani Akahi.*
- Park, Gerald. January 2003. *Field Observation.*
- Senior Living Valuation Services, Inc. April 2003. *Market Analysis Kapiolani Akahi on the Ala Wai, Ala Wai Boulevard, South of Kalakaua Avenue, Honolulu (Waikiki), Hawaii. SLVS File No. 03-02006.*
- U.S. Department of Agriculture, Soil Conservation Service. 1972. *Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai. In Cooperation with the University of Hawaii Agricultural Experiment Station. U.S. Government Printing Office, Washington D.C.*
- Wilson Okamoto & Associates, Inc. January, 2003. *Final Environmental Assessment and Finding of No Significant Impact A&B Waikiki Condominium. Prepared for A&B Waikiki LLC.*

A. LETTERS NOT REQUIRING A RESPONSE

Department of Facility Maintenance
Board of Water Supply
Department of Health, Noise, Radiation & IAQ Branch, State of Hawaii
Office of Hawaiian Affairs
Department of Transportation

B. LETTERS REQUIRING A RESPONSE

Department of Environmental Services
Department of Parks and Recreation
Office of Environmental Quality Control
Honolulu Fire Department
Department of Health, State of Hawaii
Theodore K.R. Norman
Honolulu Police Department
Department of Planning and Permitting (3)
Department of Transportation Services
Mark Duering
Barry and Barbara Feather
Fleming and Hortense Carstensen
Theodore and Corinne Riese
State Historic Preservation Division

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU
1000 ULUKOHA STREET, SUITE 215, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 492-2654 FAX: (808) 491-3427

2003 AUG 13 AM 10 55



JEREMY HARRIS
Mayor

LARRY J. LEONARDI, P.E.
DIRECTOR AND CHIEF ENGINEER

ALVIN K. C. AU
DEPUTY DIRECTOR

IN BODY REFER TO:
DRM 03-615

August 12, 2003

MEMORANDUM

TO: ERIC G. CRISPIN, AIA, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: *Larry Leonard*
LARRY J. LEONARDI, P. E., DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF FACILITY MAINTENANCE

SUBJECT: KAPIOLANI AKAHU CCRC
DRAFT ENVIRONMENTAL ASSESSMENT

Thank you for the opportunity to review the subject Draft Environmental Assessment. We have no comments at this time.

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96813

2003 AUG 19 PM 4 23



2003 AUG 14, 2003

ERIC G. CRISPIN
DEPUTY DIRECTOR

DEPARTMENT OF PLANNING AND PERMITTING

CITY & COUNTY OF HONOLULU

TO: ERIC G. CRISPIN, AIA, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: *K. Zinda*
K. ZINDA, MANAGER AND CHIEF ENGINEER

SUBJECT: YOUR MEMO OF AUGUST 1, 2003 ON THE DRAFT ENVIRONMENTAL
ASSESSMENT FOR KAPIOLANI AKAHU CCRC - HONOLULU, HAWAII,
IMK: 2-6-011: 002 AND 004 - 2003/ED-19(pdf)

The existing water system is presently adequate to accommodate the proposed project.
The availability of water will be confirmed when the building permit is approved.
When water is made available, the applicant will be required to pay our Water System
Facilities Charges for resource development, transmission, and daily storage.

The proposed project is subject to Board of Water Supply Cross-Connection Control and
Backflow Prevention requirements prior to issuance of the Building Permit Applications.

If you have any questions, please contact Joseph Kaakua at 748-5440.

JEREMY HARRIS, Mayor
EDDIE FLORES, JR., Chairman
CHARLES A. STEWART, Vice-Chairman
JAN M. Y. AM
HERBERT S. K. MAOPUA, SR.
DANOLYN H. LEONG

ROONEY K. HARRAGA, Esq.
LARRY A. LEONARDI, Esq.
CLIFFORD S. JAMILE
Manager and Chief Engineer
DOMINA RAY, Esq.
Deputy Manager and Chief Engineer

FAX (808) 594-1865

PHONE (808) 594-1868



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPOLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD#03-1100

August 22, 2003

Mr. Eric G. Crispin, AIA
Director of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

SUBJECT: ALA WAI GATEWAY -- SENIOR CONGREGATE LIVING
FACILITY - DEA

Dear Mr. Crispin:

Thank you for the opportunity to review and comment on the above referenced facility for senior citizens.

The Office of Hawaiian Affairs (OHA) agrees with the findings that an Archaeological Monitoring Plan should be prepared and submitted to the State Historic Preservation Division. Your contractors should be directed that if there are any burials discovered, work should stop immediately and the State Historic Preservation Division and the Oahu Island Burial Council should be contacted.

If you have any questions, please contact Jerry B. Norris at 594-1847 or email him at jerryn@oha.org.

Sincerely,

Peter L. Yee
Director
Neighborhood and Native Rights Division

2003 AUG 29 PM 3 59
CITY & COUNTY OF HONOLULU

OFFICE OF HEALTH
DEPARTMENT OF HEALTH

In reply, please refer to
File #



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 2799
HONOLULU, HAWAII 96813-2799

August 12, 2003

Ms. Eric G. Crispin, AIA
Director of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Crispin:

SUBJECT: Comments to the Kapiolani Akahi Continuing Care Retirement Community
Draft Environmental Assessment
TMK: 2-6-11: 002 and 004

Thank you for the opportunity to review and comment on the subject proposal. We have no comments at this time.

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

Sincerely,

Russell S. Takata
Program Manager
Noise, Radiation & IAQ Branch

LOCAL HEALTH
DEPARTMENT OF HEALTH

2003 AUG 20 PM 1 26

CITY & COUNTY OF HONOLULU

UW1-00-2003 NEW U3-00 P18 PLANNING & PERMITTING

PTA NO. 000 321 U143

T, UC

LEONARDO
GOYENGA



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
888 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

OCT 1 2003

RODNEY K. HARAGA
DIRECTOR
Dwight D. Brown
BRUCE Y. MATSUDA

BY REPLY REGISTER TO:
HWY-PS
2.1827

Mr. Eric G. Crispin, AIA, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

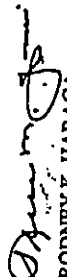
Dear Mr. Crispin:

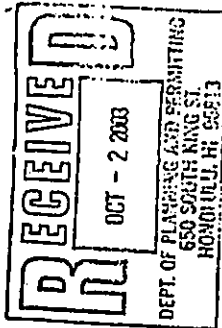
Subject: Draft Environmental Assessment (Ea) for Kapiolani Alkali CCRC, Waikiki,
TMK: 2-6-011: 2 and 4

Thank you for requesting our comments on the Draft EA. The proposed continuing care
retirement project will not significantly affect State highway facilities.

If you have any questions, please contact Ronald F. Suzuki, Head Planning Engineer, Highways
Division, at 587-1830.

Very truly yours,


RODNEY K. HARAGA
Director of Transportation



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
1020 ULUKOHA STREET, SUITE 204, WAIKIKI, HI 96817
(808) 832-5159, Fax: (808) 832-6113

Jeremy Harris
Mayor

2003 JUL 11 PM 4 U



Frank J. Doyle, P.E.
Director
Tiffany A. Hougham
Deputy Director

PRO 03-37

August 6, 2003

MEMORANDUM

TO: ERIC G. CRISPIN, AIA, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: FRANK J. DOYLE, P.E., DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

SUBJECT: KAPIOLANI AKAHILCCRC
DRAFT ENVIRONMENTAL ASSESSMENT - JULY 2003

We have reviewed the subject Draft Environmental Assessment (EA) as requested by your memo, ref.#2003/ED-19(p-d), dated August 1, 2003, and have the following comments:

1. In the description of the existing municipal wastewater system on p. 28, the Draft EA incorrectly states that the sewer main in Ala Moana Blvd conveys wastewater to the Ala Moana Sewage Pump Station. This sewer main in fact conveys wastewater to the City's Fort DeRussy Wastewater Pump Station, where it is then pumped over to the Ala Moana Wastewater Pump Station, and then on to the Sand Island Wastewater Treatment Plant.
2. On p. 44, it is stated that the Department of Planning and Permitting has approved a Wastewater Connection for the project. A copy of the approved document should be included in an appendix to the EA for reference.
3. The short description on p. 44 of how solid waste, hazardous waste, and wet garbage will be handled does not sufficiently address the potential environmental impacts and measures to mitigate adverse effects. This section should be expanded to more thoroughly address these issues, including opportunities for recycling wastes. Proper removal of grease from wastewater flow, and grease disposal issues, should also be addressed.

Should you have any questions, please call Jack Pobuk, Program Coordinator, at 692-5727.



GERALD PARK
Urban Planner

Planning
Land Use
Research
Environmental
Studies

1221 Kapiolani Blvd
Suite 211
Honolulu, Hawaii
96814

Telephone:
(808) 596-7481
Facsimile:
(808) 596-7485
e-mail:
geraldpark@aod.com

October 10, 2003

Frank J. Doyle, P.E., Director
Department of Environmental Services
1000 Uluohia Street, Suite 212
Kapolei, Hawaii 96707

Dear Mr. Doyle:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

1. Wastewater System

The Environmental Assessment will be corrected to read: "...to the Fort DeRussy Wastewater Pump Station where it is then pumped over the Ala Moana Wastewater Pumping Station..."

2. Wastewater

The Permit was approved on May 8, 2003.

3. Waste

Comprehensive management procedures for various waste products such as green waste, solid waste, wet garbage, medical waste, and grease have yet to be developed. A primary health care provider has been selected but other on-site vendors have not. Once all vendors are selected, waste generation and disposal requirements can be determined collectively. Appropriate strategies and procedures for collecting, storing, processing, and disposing of (or recycling) different types of waste would then be promulgated.

We thank the Department of Environmental Services for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Principal

c: D. Graham, GMR/HINISI

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

1000 ULUKOEA STREET, SUITE 309 • HONOLULU, HAWAII 96707
PHONE: (808) 922-5561 • FAX: (808) 922-1131 • INTERNET: WWW.DOPR.HONOLULU.HI

2003 AUG 22 PM 1 57



WILLIAM D. BALFOUR, JR.
DIRECTOR
EDWARD T. "BOBBY" O'HAZ
DEPUTY DIRECTOR

CITY & COUNTY OF HONOLULU

August 20, 2003

TO: ERIC G. CRISPIN, AIA, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: WILLIAM D. BALFOUR, JR., DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
KAPIOLANI AKAHI CCRC
TAX MAP KEY 2-6-11: 2 AND 4
2003/ED-19 (pdf)

Thank you for the opportunity to review and comment on the Draft Environmental Assessment relating to the Kapiolani Akahi CCRC senior congregate living facility.

The Department of Parks and Recreation does not endorse the applicant's election to set aside land for a private park.

Private parks, such as that proposed, do not address the parks and recreation needs of the community, and we recommend that the Park Dedication Ordinance requirements be met with a cash payment to the Park Dedication Fund.

Should you have any questions, please contact Mr. John Reid, Planner, at 692-5454.

WILLIAM D. BALFOUR, JR.
Director

WDB:cu
(1/66)

cc: Mr. Don Griffin, Department of Design and Construction



GERALD PARK
Urban Planner

Planning
Land Use
Research
Environmental
Subject

1221 Kapiolani Blvd
Suite 211
Honolulu, Hawaii
96814

Telephone:
(808) 596-7184
Facsimile:
(808) 596-7495
e-mail:
geraldpark@aol.com

October 10, 2003

William D. Balfour Jr., Director
Department of Parks and Recreation
City and County of Honolulu
1000 Uluohia Street, Suite 309
Kapolei, Hawaii 96707

Dear Mr. Balfour:

Subject: Kapiolani Akahi CCRC
TRMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We offer the following response to your comment.

The Park Dedication Ordinance provides three options for developers to comply with the subject Ordinance. The developer of the Kapiolani Akahi has elected to set aside land for a private park, which is one of the options. If the set aside is land short in satisfying the land dedication requirement, then a cash payment to the Park Dedication Fund will be made to cover the shortfall.

We thank the Department of Parks and Recreation for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Principal

cc: D. Graham, GMR/HNHSI

LINDA LINDLE
GOVERNOR OF HAWAII



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
225 SOUTH BERKELEA STREET
SUITE 201
HONOLULU, HAWAII 96813
PHONE: (808) 551-1100
FACSIMILE: (808) 551-1100
E-MAIL: oeq@state.hi.us

GENEVIEVE SALMONSON
DIRECTOR

Eric Crispin
August 25, 2003
Page 2

Text exemptions: Besides the state general excise tax, is this project eligible for any other exemptions? What is the total amount in exemptions?

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

Sincerely,

Genevieve Salmonson
GENEVIEVE SALMONSON
Director

c: Donald Graham, Honolulu Neighborhood Housing Services
Gerald Park

Eric Crispin
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Attn: Pamela Davis

Dear Mr. Crispin:

Subject: Draft Environmental Assessment (EA)
Kapiolani Akahi Continuing Care Retirement Community

We have the following comments to offer:

Pile driving: This is listed as an alternate construction method. Pile driving generally disturbs the surrounding residents a great deal in terms of both noise and vibration. In the final EA list the selected construction method. If at that point pile driving is still being considered, indicate how you will advise the surrounding neighbors and neighboring land owners of the upcoming disruption. We recommend scheduling an informational meeting for the neighborhood if pile driving will take place. If you have not already done so, forward a copy of the draft EA to the Noise, Radiation & Indoor Air Quality Branch of the Department of Health, which has oversight over construction noise issues.

Landscaping: In the final EA give a fuller description of your landscaping plan. We recommend the use of umiiruy native Hawaiian plants, trees and shrubs.

Paving: We recommend the use of recycled glass in paving materials whenever possible.

Sustainable building techniques: Please consider applying sustainable building techniques presented in the "Guidelines for Sustainable Building Design in Hawaii." In the final EA include a description of any of the techniques you will implement. Go to our website at <http://www.state.hi.us/health/oeq/guidance/sustainable.htm> or contact our office for a paper copy of the guidelines.



GERALD PARK
Urban Planner

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Research
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Facsimile:
(808) 596-7485
e-mail:
geraldp@hawaii.com

October 10, 2003

Genevieve Salmonson, Director
Office of Environmental Quality Control
State of Hawaii
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813-2437

Dear Ms. Salmonson:

Subject: Kapiolani Akahi Continuing Care Retirement Community
TMK: 2-6-011-002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

1. Pile-driving

The method for constructing the building foundation has not yet been determined. A method will most likely be selected during contract negotiations with the building contractor.

A copy of the Draft Environmental Assessment was forwarded to the Noise, Radiation, and Indoor Air Quality Branch, Department of Health. They offered no comments.

2. Landscaping

A landscaping plan was not available at the time the Draft Environmental Assessment was written. A landscaping plan will be prepared during the design phase of the project. The landscaping plan will be submitted for review and approval to the Department of Planning and Permitting.

Your recommendation for using "unthirsty" native Hawaiian plants is noted.

3. Paving

This recommendation has been forwarded to the consulting architect for consideration.

4. Sustainable Building Techniques

This comment has been forwarded to the consulting architect for consideration.

5. Tax Exemptions

The project is also eligible for real property tax exemption and exemption from state and federal income taxes.



Genevieve Salmonson
Page 2
October 10, 2003

We thank the Office of Environmental Quality Control for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

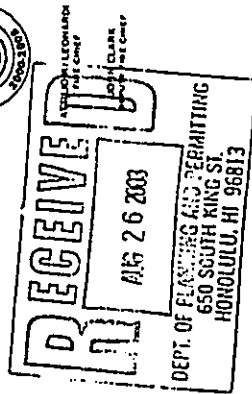
Gerald Park

Gerald Park
Principal

c: D. Graham, GMR/HNHSI

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

3375 KUMUHAU STREET, SUITE 4425 • HONOLULU, HAWAII 96819-1819
TELEPHONE: (808) 831-7781 • FAX: (808) 831-7750 • INTERNET: www.honolulu.gov



Eric G. Crispin, AIA, Director
Page 2
August 19, 2003

3. Submit civil drawings to the HFD for review and approval.

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

ATTILIO K. LEONARDI
Fire Chief

AKLUSD:jl

TO: ERIC G. CRISPIN, AIA, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: ATTILIO K. LEONARDI, FIRE CHIEF

SUBJECT: CHAPTER 343, HAWAII REVISED STATUTES
DRAFT ENVIRONMENTAL ASSESSMENT
PROJECT: KAPIOLANI AKAHU CONTINUING CARE RETIREMENT
COMMUNITY
LOCATION: 362 HOBSON LANE - WAIKIKI
TAX MAP KEY: 2-6-011: 002 AND 004

We received your memorandum dated August 1, 2003, requesting our review and comments on the above-mentioned project.

The Honolulu Fire Department (HFD) requires that the following be complied with:

1. Provide a private water system where all appurtenances, hydrant spacing, and fire flow requirements meet Board of Water Supply standards.
2. Provide a fire department access road within 150 feet of the first floor of the most remote structure. Such access shall have a minimum vertical clearance of 13 feet 6 inches, be constructed of an all-weather driving surface complying with Department of Transportation Services (DTS) standards, capable of supporting the minimum 60,000-pound weight of our fire apparatus, and with a gradient not to exceed 20%. The unobstructed width of the fire apparatus access road shall meet the requirements of the appropriate county jurisdiction. All dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with an approved turnaround having a radius complying with DTS standards.



October 10, 2003

GERALD PARK
Urban Planner

Planning
Lead Use
Research
Environmental
Studies

Attilio K. Leonard, Fire Chief
Fire Department
City and County of Honolulu
3375 Koaopa Street, Suite H425
Honolulu, Hawaii 96819-1869

Dear Chief Leonard:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

1. The water system and fire flow requirements will be designed to Board of Water Supply standards.
2. This comment has been forwarded to the project architect and engineer for consideration in the design plans for the Kapiolani Akahi.
3. Civil drawings prepared for the Kapiolani Akahi will be submitted to the Fire Department for review and approval.

We thank the Honolulu Fire Department for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER


Gerald Park
Principal

c: D. Graham, GMR/HNHSI



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

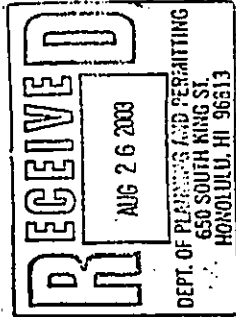
August 11, 2003

LINDA LINGLE
GOVERNOR OF HAWAII

CHRISTINE L. FURUKI, M.D.
DIRECTOR OF HEALTH

In reply, please refer to
this
file

03-866A CAB



Mr. Eric G. Crispin, AIA, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Crispin:

Subject: Draft Environmental Assessment (DEA) for 26 Story Senior Facility,
363 Hobron Lane, Waikiki, Oahu; TMK: 2-6-11: 2 and 4

Thank you for allowing us to review and comment on the draft DEA for the senior facility at 363 Hobron Lane, Waikiki, Oahu. Although the applicant has indicated compliance with Chapter 60.1, Hawaii Administrative Rules, the Department of Health, Clean Air Branch, does have additional comments.

Control of Fugitive Dust:

Due to the location of the project, proximity to residential areas and the Ala Wai Canal there is a significant potential for fugitive dust to be generated during the excavating and construction activities that would impact residential, nearby thoroughfares and a sensitive waterway. It is recommended that a dust control management plan be developed which identifies and addresses activities that have a significant potential for fugitive dust to be generated. Implementation of adequate dust control measures during all phases of the project is warranted.

Construction activities must comply with provisions of Chapter §11-60.1, Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. The contractor should provide adequate means to control dust from road areas and during the various phases of construction activities. These measures include, but are not limited to:

Mr. Eric G Crispin
August 11, 2003
Page 2

- a. Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing material transfer points and on-site vehicular traffic routes, and locating potentially dusty equipment in areas of the least impact;
- b. Providing an adequate water source at the site prior to start-up of construction activities;
- c. Landscaping and rapid covering of bare areas, starting from the initial grading phase;
- d. Controlling of dust from shoulders, project entrances, and access roads; and
- e. Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities.

If you have any questions, please contact Mr. Barry Ching of the Clean Air Branch at 588-4200.

Sincerely,

LAURENCE K. LAU
Deputy Director
Environmental Health Administration

BC:jhm



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October 10, 2003

Lawrence K. Lau
Deputy Director of Health
Environmental Health Administration
Department of Health
State of Hawaii
PO Box 3378
Honolulu, Hawaii 96801-3378

Dear Mr. Lau:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project.
We offer the following response to your comment.

The site work contractor will employ dust control measures per the requirements of Chapter 60-1,
Hawaii Administrative Rules. As stated in the environmental assessment, "the Contractor,
however, may choose to implement other measures based on their experience with similar
projects, physical conditions, and job sites."

We thank the Department of Health for participating in the environmental assessment review
process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Principal

c: D. Graham, GMR/HNHSI

August 27, 2003

To: Pamela Davis
C & C of Honolulu
Department of Planning and Permitting

From: Theodore K. R. Norman Jr.
91-953 La'aulu St. A
Ewa Beach, HI 96706

Subject: Kapiolani Akahi Continuing Care Retirement Community

Aloha Kakou,

I am one of many native Hawaiian descendants of George William Keawamahi from the Ahupua'a of Kalia, Waikiki. In this area of the planned development of the Kapiolani Akahi Continuing Care Retirement Community is where my ancestors lived. Many of my relatives were born and raised on that Apana including my own mother. That portion of Kalia is known to be where the Alii chiefs once resided when in Waikiki. It had many of the favorable fish ponds that even Kamehameha himself enjoyed its delicious rewards. My Ohana were the last Kanaka Maoli to own the large property that covered an area from the shoreline to Kalanua Blvd. and from Atkinson Rd. to the west side of Fort DeRussey bordered by Ala Moana Blvd.

I have a great concern for this project because of probable ancient burial sites. I am aware of many other ancient burial sites in Kalia and Kewalo. Our Ohana are against any development that disturbs our Kupuna Iwi. Although E. Coit Holbron had the land and fish ponds filled in with coral from the Ala Wai, it is still probable that Ancient Burials exist. The projects plan to drill into the ground for concrete footing will possibly disturb ancient burial sites. Therefore a thorough archaeological survey should be made. A thorough survey will have to include below the top surface of ground, meaning below the fill material in the entire area of the development before any permit of construction is given. I would like your assurance that the survey would be done and when any burial sites are found that permits for construction be denied.

The name for the project is also inappropriate. Why is it called or named after Kapiolani? She did not have any ties on this particular Apana. The name should be changed.

Mahalo Nui Loa,

Theodore K.R. Norman Jr.



GERALD PARK
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Facsimile:
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E-mail:
geraldpark@aol.com

October 10, 2003

Theodore K.R. Norman, Jr.
91-953 La'aulu St. A
Ewa Beach, Hawaii 96706

Dear Mr. Norman:

Subject: Kapiolani Akahi Continuing Care Retirement Community
TNMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We offer the following responses to your comments.

After consulting with staff of the State Historic Preservation Division, Honolulu Neighborhood Housing Services, Inc. will conduct an archaeological inventory survey of the parcel. If cultural deposits, subsurface artifacts, or human remains are unearthed, Applicant will adhere to the protocol procedures established by the State Historic Preservation Division.

Applicant will also provide archaeological monitoring during trenching, excavating, and boring activities associated with ground disturbances.

The project name was chosen when the project was proposed for a site on Kapiolani Boulevard. The current plan is to rename the project Ala Wai Akahi Senior Living to reflect its present location.

We thank you for your interest in this project and for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Principal

c: D. Graham, GMR/JNHSI

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
 801 SOUTH BERETANIA STREET
 HONOLULU, HAWAII 96813 - AREA CODE (808) 328-3111
 2:30 SEP 3 PM
 www.honolulu.gov
 www.cc.honolulu.hi.us



LEE D. DONOHUE
 CHIEF
 OLIVER K. KAJIYAMA
 PAUL D. PUTZIGLU
 DEPUTY CHIEFS

JEREMY HARRIS
 MAYOR
 OUR REFERENCE CS-KP

September 2, 2003

TO: ERIC G. CRISPIN, AIA, DIRECTOR
 DEPARTMENT OF PLANNING AND PERMITTING
FROM: LEE D. DONOHUE, CHIEF OF POLICE
 HONOLULU POLICE DEPARTMENT
SUBJECT: CHAPTER 343, HAWAII REVISED STATUTES
 DRAFT ENVIRONMENTAL ASSESSMENT
 KAPIOLANI AKAHU CCRC, WAIKIKI, OAHU

Thank you for the opportunity to review and comment on the subject project.
 Although we have no objection to the proposed project, we do have a recommendation and some concerns.

In spite of the stated construction mitigation measures, calls for police service to the area because of fugitive dust, noise, and construction-related traffic are inevitable.
 It is advisable to include more guest stalls. Considering the total number of residents, eight on-site guest stalls will not be adequate and will force visitors to seek on-street parking. This area is already congested, and on-street parking spaces are not usually available. This may force people to park their vehicles illegally, which in turn will have a negative impact on calls for police service to the area.

The elderly generally are victims of crimes, such as thefts, robberies, and assaults. There are other situations, such as unattended deaths and missing persons cases, which generate an overall increase in calls for police service to the area.

If there are any questions, please call Major Thomas Nitta of District 6 at 529-3361 or Ms. Carol Soderant of the Support Services Bureau at 529-3658.

LEE D. DONOHUE
 Chief of Police
 By *Lee D. Donohue*
 KARL GODSEY
 Assistant Chief of Police
 Support Services Bureau

Serving and Protecting with Aloha



GERALD PARK
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 geraldpark@aol.com

October 10, 2003
 Lee D. Donohue, Chief of Police
 Police Department
 City and County of Honolulu
 801 S. Beretania Street
 Honolulu, Hawaii 96813

Dear Chief Donohue:
 Subject: Kapiolani Akahi CCRC
 TMK: 2-6-011: 002, 004
 Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

Construction Impacts

It is agreed that calls for police service during construction because of noise, dust, and traffic are inevitable even with the mitigating measures described in the environmental assessment.

Guest parking stalls

It is recognized that the area is already congested and there is a paucity of on-street parking spaces. More on-site visitor parking stalls will be allocated if possible or alternative guest parking measures will be implemented as the need arises. Such measures may include limiting guest parking to a certain amount of time, tandem parking, attendant parking, and sharing parking stalls set aside for administrators and employees.

Calls for police service

It is anticipated that on-site security would help to deter crimes such as theft, robbery, and assault from occurring on the grounds of the Kapiolani Akahi. As you pointed out, the police would be summoned as a matter of reporting such crimes when they occur.

We thank the Honolulu Police Department for participating in the environmental assessment review process.

Sincerely,
 GERALD PARK URBAN PLANNER
Gerald Park
 Gerald Park
 Principal

c: D. Graham, GMR/VNH/HSI

DPP Memorandum
Community Action Plans Branch

04 September 2003

To: Pam Davis, Land Use Approval Branch
 Via: Kathy Sokugawa, Division Chief *KS*
 Lowell Chun, Branch Chief *LC*
 From: Bonnie Arakawa *BA*
 Subject: Kapiolani Akahi Continuing Care Retirement Community - Waikiki
 Draft Environmental Assessment Review
Tax Map Keys 2-6-011: 002 and 004

Primary Urban Center Development Plan

The discussion on the Primary Urban Center (PUC) Development Plan (DP) needs to be revised to correctly reflect the revision program for the Development Plans. Six of the DPs, not all 8, are re-designated as *Sustainable* Communities Plans. The PUC DP and the adopted Central Oahu DP both retain the Development Plan designation.

The DEA should also provide discussion on the proposal's consistency with the *Draft* PUC DP, dated May 2002, where the Land Use Map indicates the project area as Resort. The project design should take advantage of its proximity to the Ala Wai Canal waterway and the designated pedestrian network (Land Use Map) and bicycle link in the Lei of Parks Concept Plan (Fig 3.18) along Ala Wai Boulevard. The proposed garden and open space element could significantly contribute to this pedestrian experience along Ala Wai Boulevard, however Sheet L-1 indicates a continuous wall along the sidewalk, separating the pedestrian from the open space.

P:\casia\2003\KapiolaniAkahi.doc

Record agency comments
 Job 018386707-002 (2003/ED-19)

Civil Engineering Branch

Assigned To	Status	Outcome	Scheduled		Actual	
			Start	Completed	Start	Completed
MITAKAKURA	Complete	Recorded				Aug 06, 2003 15:43:34

Agency: CEB

Reviewed by: Don Fuji

Agency Comments:

1. A storm drain connection forms will be required for the proposed connection to the City's drainage system (MS4). Include this to your list of Permits and Approvals. (DF)
2. Page 49, Item #15: The response appears to be incomplete. (DF)
3. Page 50, Item #12: The statement in bold text is incomplete. (DF)
4. From the information to repair or construct sidewalks and curb ramps may be required pursuant to Ordinance 2412. (DK)
5. All drainage improvements shall comply with the city's standards. (DK)
6. Permitted Best Management Practices (BMP) shall be incorporated into the drainage system, such as, installing wet filters or filtering the runoff in landscaped areas, prior to discharging it into the city drainage system. (DK)
7. Section A.C. Addressing storm runoff is not completely accurate. CEB runoff policy is that changes in runoff as a result of proposed construction that have an adverse impact on City / Private property will not be allowed. Therefore site runoff is not necessarily linked to predevelopment levels, unless it can not be handled without adverse impacts to City drainage/property and/or private property. (KA)

Comments:

**Record agency comments
Job 018386707-002 (2003/ED-19)**

Assigned To	Status	Div/zone	Scheduled		Actual	
			Start	Completed	Start	Completed
CHING	Complete	Recorded				Aug 01, 2003 11:01:09

Details

Agency: Wastewater Branch
Reviewed by: T Ching

Agency Comments:

The municipal sewer system is adequate to accommodate the proposed project. A Site Development Division Request Application Form for Sewer Connection (2003/SCA-0240) was approved on May 15, 2003. The developer should note that the sewer connection form expires one year from when issued. The estimated sewer connection date of June 1, 2003. A new connection application may be required.

Comments:



GERALD PARK
Urban Planner

- Planning
- Land Use
- Research
- Environmental
- Studies

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October 10, 2003

Eric G. Crispin, AIA, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Crispin:

Subject: Kapiolani Akahi CCRC
TMK: 2-G-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We offer the following response to your comment.

Community Action Plans Branch

The discussion of Development Plans and Sustainable Communities Plans on page 32 will be revised as noted.

Because the Draft PUC Development Plan is a draft plan and subject to public review and change, a discussion of consistency of the project with a Draft PUC DP that may be revised does not appear warranted.

The project design takes advantage of its location adjoining the Ala Wai Canal and the planned pedestrian network proposed along Ala Wai Boulevard.

Civil Engineering Branch

1. A Storm Drain Connection License will be added to the List of Permits and Approvals.
2. The paragraph has been completed.
3. The statement is written correctly.
4. Acknowledged. Thank you for the information about Ordinance 2412.
5. All frontage improvements will comply with City standards.
6. Acknowledged.
7. The discussion of storm runoff will be revised per your comment.

Wastewater Branch

Response not required.



Eric Crispin
October 10, 2003
Page 2

We thank the Department of Planning and Permitting for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Gerald Park
Principal

c: D. Graham, GMR/HNHSI

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
430 SOUTH KING STREET, 3RD FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 522-4313 • FAX: (808) 522-1770 • INTERNET: www.honolulu.gov



JEREMY HARRIS
DIRECTOR

CHERYL D. SOON
DIRECTOR
GEORGE WEDON MITUMOTO
SENIOR DIRECTOR

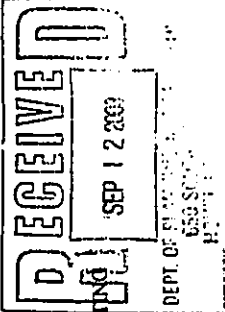
September 10, 2003
TPD8/03-30978R
TPD03-00437/00428/00424

MEMORANDUM

TO: ERIC G. CRISPIN, AIA, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: KAPOLANI AKAHLCCRC



In response to your August 1, 2003 memorandum, we reviewed the draft environmental assessment (EA) for the subject project. The following comments are the result of this review:

1. The draft EA does not address public transportation impacts. The proposed Hobron Lane entrance is a short block away from a bus stop serviced by Routes 8, 19, 20, 42 and 58. The project should assure that there is an accessible path within the project to the public right-of-way and that residents, visitors and employees who use public transportation are directed to bus stops at Ala Moana Boulevard/Hobron Lane.
2. Residents, visitors and employees who are Americans with Disabilities Act (ADA) paratransit eligible and use TheHandi-Van, a curb-to-curb system, will likely be picked up and dropped off in the public right-of-way (Hobron Lane) near the entry.
3. Based on our review of the proposed traffic that may be generated by this project, we do not anticipate any significant traffic impacts on City roadways or on the proposed Bus Rapid Transit project that will be constructed along Ala Moana Boulevard.
4. The Hobron Lane driveway should be aligned directly across from Kaioo Drive.
5. The internal traffic circulation near the Hobron Lane driveway may be problematic. The conflict point between vehicles exiting down the ramp and vehicles entering and wanting to turn left to the Garden Level is close to Hobron Lane. This may result in problems associated with queuing and the potential for rear end accidents.

Eric G. Crispin
Page 2
September 10, 2003

6. Passenger vehicles over 15,000 pounds will be prohibited on Ala Wai Boulevard from Kalakaua Avenue to its makai end and on Lipepet Street between Ala Wai Boulevard and Hobron Lane. If applicable, this should be considered by the project.

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

CHERYL D. SOON



GERALD PARK
Urban Planner

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e-mail: gpm@kapolei.net.com

October 14, 2003

Cheryl D. Soon, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Kapolei Akahi CCRC
TRK: 2-6-011; 002, 004
Waikiki, Oahu, Hawaii
(TPD8/03-30978R)

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. We offer the following response to your comment.

1. Public Transportation Impacts

Public transportation impacts cannot be determined at this time. It can be presumed that residents and employees that depend on public transportation will find out that the nearest bus stop is at Hobron Lane and Ala Moana Boulevard.

Accessible pedestrian access to Hobron Lane and Ala Wai Boulevard will be provided within the development.

2. ADA Pick-up/Drop-off

This comment will be passed on to the developer.

3. Traffic Generation

Response not required.

4. Hobron Lane Alignment

The project architect, civil engineer, and developer will look into aligning the Hobron Lane driveway directly across Kaioo Drive or as close to directly across Kaioo Drive.

5. Internal Traffic Circulation

Your comment about internal circulation near the Hobron Lane driveway has been forwarded to the project architect for consideration.

6. Vehicle Weight

Thank you for this information.



Cheryl Soon
Page 2
October 14, 2003

We thank the Department of Transportation Services for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Gerald Park
Principal

c: D. Graham, GMR/HINISI

527-6743 (Fax)

Pam Davis
Eric Crispin
Dept of City Planning
650-South King St, 7th Floor
Honolulu, Hawaii, 96813

Sept 18, 2003

Re: Senior Housing Project fronting Ala Wai Blvd & Hobron Lane

Dear Pam & Eric,

I spoke with Pam on the telephone. She asked that I address this letter as stated above, and that your department is receiving public input re: the above project until Sept 20, 2003.

My sister owns 3 condominium apartments in Chateau Waikiki (411-Hobron Lane). The concern is the newly proposed project "blocking views" facing Ewa. I obtained a copy of the proposed renovation/building plans from Graham, Murata & Russell. Mr. Graham indicated that the City was suggesting to turn the horizontal layout of the main building at a different angle, so to reduce the view obstructions, for reasons which I presume was to "minimize" the west/very panoramic views that Chateau Waikiki high rise condominiums (facing West) now enjoy.

I encourage that this "change" to the existing plans be required by the City, which would not require modification of the structural building plans, and would only require new drawings for the "site plan".

If the new proposed Senior Housing Project is angled perpendicular to the Chateau Waikiki views, the blockage of views will be limited to the "width" (of approx. 60 feet) of the proposed new structure.

If the new proposed building is at an angle to Chateau Waikiki different from 90 degrees, it will expand the 60 feet width, and block a considerably larger portion of the views which those condos now enjoy.

In doing so, it will also not diminish the value of the condominiums proposed for the new Senior Housing Project.

Please notify me at my below address of any meetings and/or new developments re: the above project.

Thank you.

Mark Duerling
PO Box 10081
Honolulu, Hawaii, 96816
735-1246



GERALD PARK
Urban Planner

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- Land Use
- Recreation
- Environmental
- Studies
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- 96814
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- Facsimile:
- (808) 596-7485
- e-mail:
- geraldpark@aol.com

October 10, 2003

Mark Duerling
PO Box 10081
Honolulu, Hawaii 96816

Dear Mr. Duerling:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011-002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

The podium and tower comprising the Kapiolani Akahi CCRC are set back from Ala Wai Boulevard a minimum of 15 feet as required by the zoning code. In addition, all tower levels have been set back an additional 26 feet above the 40-foot height level to add interest to the vertical building facade. The tower will feature pitched roofs to further add architectural interest and a visual sense of an old-style Hawaiian dwelling. The tower orientation is perpendicular to Ala Wai Boulevard.

The proposed project will require building permit approval from the Department of Planning and Permitting, City and County of Honolulu. The project is proposed in a section of Waikiki that is approved for apartment use. The addition of health care facilities, however, requires the Applicant to seek a Conditional Use Permit. Application for this permit will be submitted after the completion of the environmental review process.

Draft plans and drawings have been submitted to the City for preliminary discussion purposes only. As a result of these discussions and recommendations from Department of Planning and Permitting staff, the project architect has instituted revisions to the original plans. The project will require a Conditional Use Permit and a Waikiki Special District Permit (Major) as part of the approval process. Both permits require a public hearing. Following the public hearings, institutional and public recommendations may also result in additional design changes to the tower and podium.

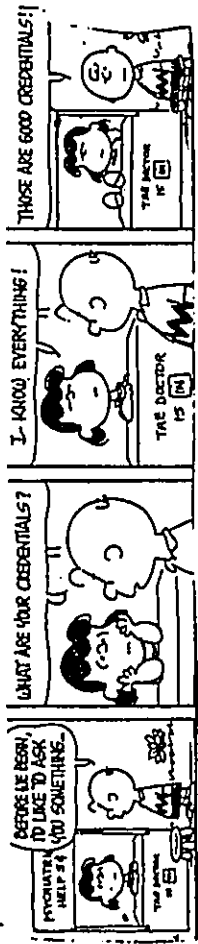
Thank you for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Principal

c: D. Graham, GMR/HNHSI



14 SEPTEMBER 1 2002
2:03 SEP 14 PM 10:40

BARRY and Barbara Feather
1778 Ala Moana Blvd
#3819
Honolulu, HI 96815-1627

TO WHOM IT MAY CONCERN:

AS HOMEOWNERS AND RESIDENTS OF THE AREA WHERE THIS PROPOSED PROJECT (KAPIOLANI AKAHI CONTINUING CARE) WOULD BE LOCATED, MY HUSBAND AND I ARE SHOCKED BY THE ANNOUNCEMENT OF THIS EARSTWHILE UNKNOWN BUILDING. AND WE ASSUREDLY ARE NOT ALONE IN OUR OUTRAGE. THIS AREA IS ALREADY SATURATED WITH HI-RISES, SO A BUILDING OF 26 STORIES WOULD NOT ONLY BE OVERLY TAXING FOR THIS NEIGHBORHOOD, BUT SUCH AN INAPPROPRIATELY TALL BUILDING WOULD, BY ITS WIDTH AS WELL AS ITS HEIGHT, DESTROY THE RELATIVELY UNENCUMBERED AMBIENCE OF THE ADJACENT ALA WAI CANAL AREA, TO SAY NOTHING OF HOW IT WOULD ADVERSELY AFFECT THE VIEWS AND PROPERTY VALUES OF OTHER LONGTIME RESIDENTS. WHY SHOULD A "NON-PROFIT" BUILDING BE SO EAGER TO MAKE SUCH A NEGATIVE IMPACT UPON A NEIGHBORHOOD?

WHY WAS THIS PROPOSED PROJECT NOT PUBLICIZED BEFORE THIS? THERE IS ALREADY A LARGE BUILDING BEING CONVERTED TO SENIOR LIVING FACILITIES IN THIS IMMEDIATE AREA, SO IT

(2)

WOULD SEEM THAT ANOTHER LARGE BUILDING OF THIS TYPE WOULD BE REDUNDANT AND SUPERFLUOUS. WITH THE HEAVY TRAFFIC FROM ALA MOANA BOULEVARD, AND THE MANY NIGHTCLUBS WHICH ATTRACT A VERY UNSAVORY ELEMENT TO THIS NEIGHBORHOOD, WITH A RELATIVELY ELEVATED ATTENDANT CRIME RATE, THIS WOULD SEEM AN UNLIKELY LOCATION FOR ONE COMPLEX FOR SENIORS, MUCH LESS TWO. AT LEAST THE BUILDING NOW BEING CONVERTED FOR SUCH A USE WAS ALREADY CONSTRUCTED; THE SEEMINGLY ENDLESS HAVOC AND DISRUPTION FROM THAT PROJECT IS NONETHELESS A CONTINUING NIGHTMARE WITH DIRT, TRAFFIC CONGESTION, AND DISRUPTED FACILITIES, TO SAY NOTHING OF PARKING PROBLEMS AND NOISE FROM CONSTRUCTION, BOTH OF WHICH ARE CONSIDERABLE. YET THE NEIGHBORHOOD IS BEING ASKED TO ENDURE AN EVEN WORSE PROJECT? NO WONDER IT IS SO UNPOPULAR AND UNWELCOME, EVEN BEFORE THE FIRST SHOVELFUL OF DIRT HAS BEEN UNEARTHED. PROJECT SPOKESMAN DONALD GRAHAM STATES THAT THIS LOCATION IS ADVANTAGEOUS TO THE PROJECT BECAUSE "WE WANT TO PUT IT WHERE THE PEOPLE ARE WHO ARE GOING TO USE IT. IF IT IS OUT IN HAWAII KAI, IT WOULD BE HARDER FOR RELATIVES TO VISIT." WHAT??? WHO EXACTLY ARE "THE PEOPLE" TO WHOM HE ALLUDES? WHY IS HE ASSUMING THAT THIS IS A CONVENIENT LOCATION FOR SENIORS? AND WHY WOULD IT BE A HANDSHIP FOR THEM OR FOR THEIR RELATIVES TO VISIT THEM IN HAWAII KAI... OR WAIPAHAU OR KAPOLEI, FOR THAT MATTER? THIS IS AN AREA OF UPSCALE RESIDENCES, WHICH CONTRADICTS MR. GRAHAM'S ASSERTIONS REGARDING THE TYPE OF SENIORS AND THEIR RELATIVES WHICH HE HOPES TO ATTRACT.

3.

AS FOR THE PERENNIAL PROBLEM, PARKING, WHERE ON EARTH WOULD THE SENIORS, THEIR ALREADY FAMOUS RELATIVES, AND INNUMERABLE EMPLOYEES AND ADMINISTRATORS PARK? ITS BEYOND LUDICROUS TO PROPOSE PROVIDING 148 STALLS AND 10 HANDICAPPED SPACES FOR 275 RESIDENTS AND "ABOUT 134" EMPLOYEES, MUCH LESS COUNTLESS VISITORS AND SERVICE PERSONNEL, TRADESMEN, AND OTHER MYRIAD VEHICLES. THE NEIGHBORHOOD SIMPLY CANNOT ABSORB SUCH A LARGE NUMBER OF VEHICLES, VANS, ETC., WITH NOWHERE TO PARK NOR ANYWHERE REMOTELY CLOSE TO THIS AREA, WITH ITS PAUCITY OF STREET PARKING OR PUBLIC PARKING FACILITIES. IT'S ALMOST TOO NIGHTMARISH TO CONCEIVE OF THE ENORMITY OF FURTHER DISRUPTION TO THE NEIGHBORS' RIGHT TO PEACEFUL ENJOYMENT OF PROPERTY WHEN SUBJECTED TO THE NON-STOP INGRESS AND EGRESS OF EMERGENCY AND OTHER VEHICLES THAT THIS PROPOSED ILL-CONSIDERED BEHEMOTH WOULD NECESSARILY AND INEVITABLY BRING ON A PERMANENT BASIS. IT'S UNCONSCIONABLE TO EVEN TAKE SERIOUSLY SUCH AN INAPPROPRIATE PROPOSAL SUCH AS THIS, SO REST ASSURED THAT WE RESIDENTS WILL VIGOROUSLY OPPOSE IT, ALONG WITH THOSE WHO SUPPORT IT. IT IS ILL-ADVISED TO ATTEMPT TO FURTHER TAX THIS AREA ALREADY INADEQUATE INFRASTRUCTURE, AND

4.

MR. GRAHAM'S ASSERTION THAT "READY ACCESS TO UTILITIES" MAKES THE LOCATION DESIREABLE IS NOTHING MORE THAN WISHFUL AND MAGICAL THINKING. THERE IS NO PARKING NOW, THE SEWERS BACK UP AND FLOOD THE STREETS AT PREDICTABLE INTERVALS, AND HECO CAN'T SEEM TO PROVIDE UNINTERRUPTED SERVICE, SO ONLY A MIND THAT IS NOT COUNNECTED TO REALITY WOULD BE NAIVE ENOUGH TO CONSIDER GETTING BLOOD FROM A TURNIP", SO TO SPEAK. THERE HAS BEEN NO LOGICAL, REASONABLE, JUSTIFIABLE, THOUGHTFUL, REALISTIC, STUDIED EXPLANATION FOR WHY THIS PROJECT SHOULD BE ALLOWED TO ADVANCE IN THE PROPOSED LOCATION, SO WE ASK THAT SOUND JUDGEMENT PREVAIL TO DISCOURAGE IT. SUCH DENSITY, TO SAY NOTHING OF A QUASI MEDICAL FACILITY, IS UNWARRANTED IN THIS PARTICULAR NEIGHBORHOOD, AND ITS DISPUTABLE BENEFITS WOULD BE FAR OUTWEIGHED BY ITS PREDICTABLY NEGATIVE PERMANENT IRREVERSIBLE DISASTROUS OUTCOME. WE REQUEST THAT THIS PROPOSED PROJECT BE DENIED, AND WILL WORK FERVENTLY TO ACHIEVE SUCH A RESULT.

VERY TRULY YOURS,

Barbara and Barry Feather

Barry and Barbara Feather
1778 Ala Moana Blvd
#3819
Honolulu, HI 96815-1627

DEPARTMENT OF PLANNING AND PERMITTING, HONOLULU
STATE OF HAWAII OFFICE OF ENVIRONMENTAL QUALITY CONTROL



GERALD PARK
Urban Planner

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- Land Use
- Research
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96814

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e-mail:
geraldpark@aol.com

October 10, 2003

Mr. & Mrs. Barry & Barbara Feather
1778 Ala Moana Blvd., Apt. 3819
Honolulu, Hawaii 96815-1627

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 02, 004
Waikiki, Oahu, Hawaii

Dear Mr. & Mrs. Feather:

Thank you for your comments after reviewing the Draft Environmental Assessment prepared for the Kapiolani Akahi CCRC project.

You reside in Discovery Bay, one of the projects in which Mr. Graham participated. Mr. Graham selected the address, 1778 Ala Moana Boulevard, as it memorializes the year when Captain James Cook first landed in Waimea, Kauai on his Third Voyage of Discovery. The two Discovery Bay towers are each named after one of Captain Cook's ships, HMS Resolution and HMS Discovery. Each tower lobby was provided with a model of each ship. I hope you enjoy residing in Discovery Bay.

Equal care will be taken with the Kapiolani Akahi. As you may know, Mr. Graham was the Development Manager for the successful Arcadia CCRC project on Punahou Street, for Ala Moana Center, and various other projects including 1350 Ala Moana, where he resides.

Some of the benefits that the Kapiolani Akahi will bring to Hawaii are summarized below:

1. Will provide independent living apartments for 195 seniors (it is assumed 60% will be couples) of Hawaii's growing population of seniors.
2. Will provide health care facilities for 73 seniors (nursing, assisted living, dementia care).
3. Will provide new employment for:
 - 300 to 400 construction workers in the short-term
 - 140 to 150 facility employees in the long-term
4. Will bring over \$80,000,000 of new outside money to Hawaii.
5. Will not use government money.
6. Will be a non-profit project, locally owned and operated.
7. Will provide a Wellness Center, Fitness Center with pool, parking and other customary amenities.
8. Will provide that Entry Fees are 90% refunded after the senior resident vacates the apartment.

The GMR partnership is the Development Manager and Agent for Honolulu Neighborhood Housing Services, Inc., a 501-c-3 non-profit, tax-exempt, local corporation, the Owner/Sponsor.



Mr. & Mrs. Barry & Barbara Feather
October 10, 2003
Page 2

Thank you for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Gerald Park
Principal

C: D. Graham, GMR/HNHSI

1645 ALA WAI BLVD. PH-3
HONOLULU, HI 96815-1008
808-946-2211

19 September, 2003

2003 SEP 24 PM 3 30

Honolulu Neighborhood Housing Services, Inc.
810 Vineyard Blvd., Room 4
Honolulu, HI 96817

CITY & COUNTY OF HONOLULU



Posted on: Sunday, August 24, 2003

High-rise to cater to seniors

By James Gonsler
Advertiser Urban Honolulu Writer

A nonprofit group plans to develop a 26-story, \$113 million senior congregate living facility in the Hobron Lane area of Waikiki.

Honolulu Neighborhood Housing Services Inc. hopes to provide apartments and other services for up to 275 seniors when construction is completed in late 2003 or early 2006. The group has filed a draft environmental assessment for the project with the state.

To be called the Kapi'olani Akahi Continuing Care Retirement Community, the development will be on 3 acres of vacant land bounded by Ala Wai Boulevard and Hobron Lane and between the Tropicana and Moani apartments.

Project spokesman Donald Graham Jr. said that the need for more senior living is increasing quickly, along with Hawaii's aging population, and that the location in Waikiki is convenient for shopping, transportation and visits by relatives.

"We want to put it where the people are who are going to use it," Graham said. "If it is out in Hawaii Kai, it would be harder for relatives to visit."

Graham said Kapi'olani Akahi would not be a luxury facility.

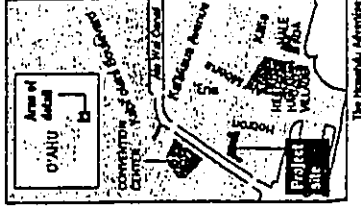
"It is a typical, quality project for seniors," he said.

However, those eligible for residency — seniors 62 and older — must put up a refundable deposit of about \$500,000 for a lifetime right to live in the apartment. The deposit is 90 percent refundable when they leave the apartment.

Residents also will pay a monthly service fee of about \$2,500, which includes one meal a day.

According to the 2000 census, 151,000 people on Oahu are 60 or older. That figure is expected to increase by 20 percent by 2010.

Kapi'olani Akahi will have 122 independent living units and amenities that include a dining room, an indoor pool, a fitness center, two beauty shops, a library and reading room, a recreation area, gardens and a party room.



Public Comment re: Proposed Kapi'olani Akahi Continuing Care Retirement Community,
Ala Wai Blvd. between Lipepee Street and Ala Moana Blvd., Honolulu

Honolulu Advertiser published an article by James Gonsler on August 24, 2003, see attached copy, describing the plans of a nonprofit group, Donald Graham, Jr./GNR Inc., Honolulu Neighborhood Housing Services, to build a 26 story tower built as close to the street, Ala Wai Blvd., as the law permits with a minimal set back amid a cluster of existing high rises on a 3 acre plot fronting the Ala Wai Canal. This development will have 122 independent living units providing apartments and other services for up to 275 seniors 62 and older. Amenities include a dining room, indoor and outdoor pools, a fitness center, two beauty shops, a library and reading room, a recreation area, garden, as well as a 13 bed skilled nursing facility, an Alzheimer's unit, an assisted living unit and parking for 148 vehicles. The development will accommodate a senior who can pay the required \$500,000 to move in and a \$2,500 monthly fee.

Some stated aspects of this development raise concern. At present, one can see the result of building housing for seniors on Keahole Street, opposite Hawaii Kai Shopping Center, as close to the street as the law permits.

Does building such a tower have the approval of the City and County of Honolulu, Department of Planning & Permitting, and/or meet the criteria of Urban Planning/Waikiki Special Design District?

Is this development a non-profit development?

Is this development sponsored by HUD and/or granted concessions for financial support from HUD? If so, by what criteria?

Does this project contribute to affordable housing for the elderly or just provide another up scale housing choice for a small group of elderly who can afford luxury housing? There are now two other developments in progress in Waikiki catering to upscale seniors.

Does the 3 acre site include the derelict housing area or only current vacant land?

More information as posed by the above is needed before this project should be allowed to proceed.

Thank you for consideration of these comments.

Flemming H. Carstensen
Honolulu, Hawaii - Kualoa

cc City and County of Honolulu, Department of Planning and Permitting,
" " " " Environmental Quality Division
State of Hawaii, Environmental Planning Office

Public comment

To comment on the draft environmental assessment, write to Honolulu Neighborhood Housing Services Inc., 810 H. Vineyard Blvd., Room 4, Honolulu, HI 96817. Include copies for the city Department of Planning and Permitting and the state Office of Environmental Quality Control.

The deadline for public comment is Sept. 22.



GERALD PARK
Urban Planner

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October 10, 2003

Mr. and Mrs. Fleming Carstensen
1645 Ala Wai Boulevard, PH-3
Honolulu, Hawaii 96815-1008

Dear Mr. and Mrs. Carstensen:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

1. The podium and tower are set back from Ala Wai Boulevard a minimum of 15 feet as required by the zoning code. In addition, all tower levels have been set back an additional 26 feet above the 40-foot height level to add interest to the vertical building facade. The tower will feature pitched roofs to further add architectural interest and a visual sense of an old-style Hawaiian dwelling.
2. The proposed project will require building permit approval from the Department of Planning and Permitting, City and County of Honolulu. The project is proposed in a section of Waikiki that is approved for apartment use. The addition of health care facilities, however, requires the Applicant to seek a Conditional Use Permit. Application for this permit will be submitted after the completion of the environmental review process.

Draft plans and drawings have been submitted to the City for preliminary discussion purposes only. As a result of these discussions and recommendations from Department of Planning and Permitting staff, the project architect has instituted revisions to the original plans. The project will require a Conditional Use Permit and a Waikiki Special District Permit (Major) as part of the approval process. Both permits require a public hearing. Following the public hearings, institutional and public recommendations may also result in additional design changes to the tower and podium.
3. The project is sponsored by Honolulu Neighborhood Housing Services, Inc. a local, non-profit organization.
4. The Kapiolani Akahi CCRC is not a HUD sponsored project. The project does not involve any government money.
5. The project is anticipated to house an elderly population (estimated at 195 persons) desiring an upscale living environment with health care amenities on-site.
5. The Kapiolani Akahi is proposed on 3 acres of vacant land located between the Tradewinds Mauka apartment complex to the south and the Moani Apartments to the north.



Mr. and Mrs. Fleming Carstensen
Page 2
October 10, 2003

Thank you for participating in the environmental assessment review process.

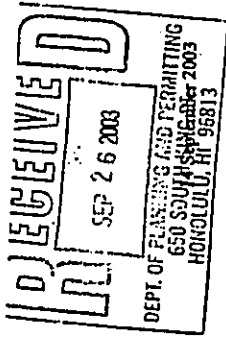
Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

Gerald Park
Principal

c: D. Graham, GMR/HNHSI



Theodore Riess
Corinne Villa-Riess
1645 Ala Wai Blvd 1205
Honolulu HI 96815

Honolulu Neighborhood Housing Services, Inc.
810 N. Vineyard Blvd. Room 4
Honolulu, HI 96817

Public Comment re. Proposed Kapiolani Akahi Continuing Care Retirement Community, Ala Wai Blvd between Lapepee and Ala Moana, Honolulu

This proposed development consists of a twenty-six story tower fronting Ala Wai Canal, as close to the street as the law will allow, and with minimally stepped back design. As such, it will inevitably impact us and our neighbors through the elimination of views and light. In addition to such personal concerns, however, the proposal raises larger community issues that need to be addressed before the project is allowed to go forward.

The Project Will Not Contribute to Affordable Housing for the Elderly. According to Astrid Jackson, Executive Director for Kapiolani Akahi and apparently an employee of the developer, Donald Graham, Jr./GMR, Inc, Honolulu Neighborhood Housing Services Inc "is a HUD affiliate, a not-for-profit organization whose purpose has been the reconditioning of housing" for low income people. Kapiolani Akahi, however, is an upscale development which will require \$500,000 to move in and \$2500 per month in fees from each resident. According to developer Graham, Kapiolani Akahi is a "typical...project for seniors." For typical rich seniors, perhaps—and with the Federal Government giving them a helping hand—but it can hardly be claimed that Kapiolani Akahi will do much to alleviate the housing and care needs of ageing Hawaiians.

The Project is One More Pillar in the Berlin Wall Approach to Waikiki Development. The site plan and elevation drawing for Kapiolani Akahi Continuing Care Retirement Community show a concrete box rising twenty-six stories above Ala Wai Blvd as close to the street as the law allows. According to Executive Director Jackson, the minimal stepped back design of the tower is the result of the developer working closely with the planning department to minimize the adverse impact the building would have on the neighborhood. Essentially, however, the building is one more high-rise brute among the many which have given Waikiki its worldwide reputation as a concrete jungle, and as such appears to contradict the entire mandate behind the establishment of a Waikiki Special Design District.

The Project Represents an Absence of Urban Planning. The area in which the Kapiolani Akahi Continuing Care Center proposes to rise is, to put it charitably, blighted. It is a multi-acre rectangle of vacant lots, parking lots, and low rise apartments ranging from the barely habitable to the boarded up. If ever there was an urban area which called for a plan, this is it. Unfortunately, the Kapiolani Akahi development indicates that neither the city or the developer is thinking about the future of this area in any kind of comprehensive way.

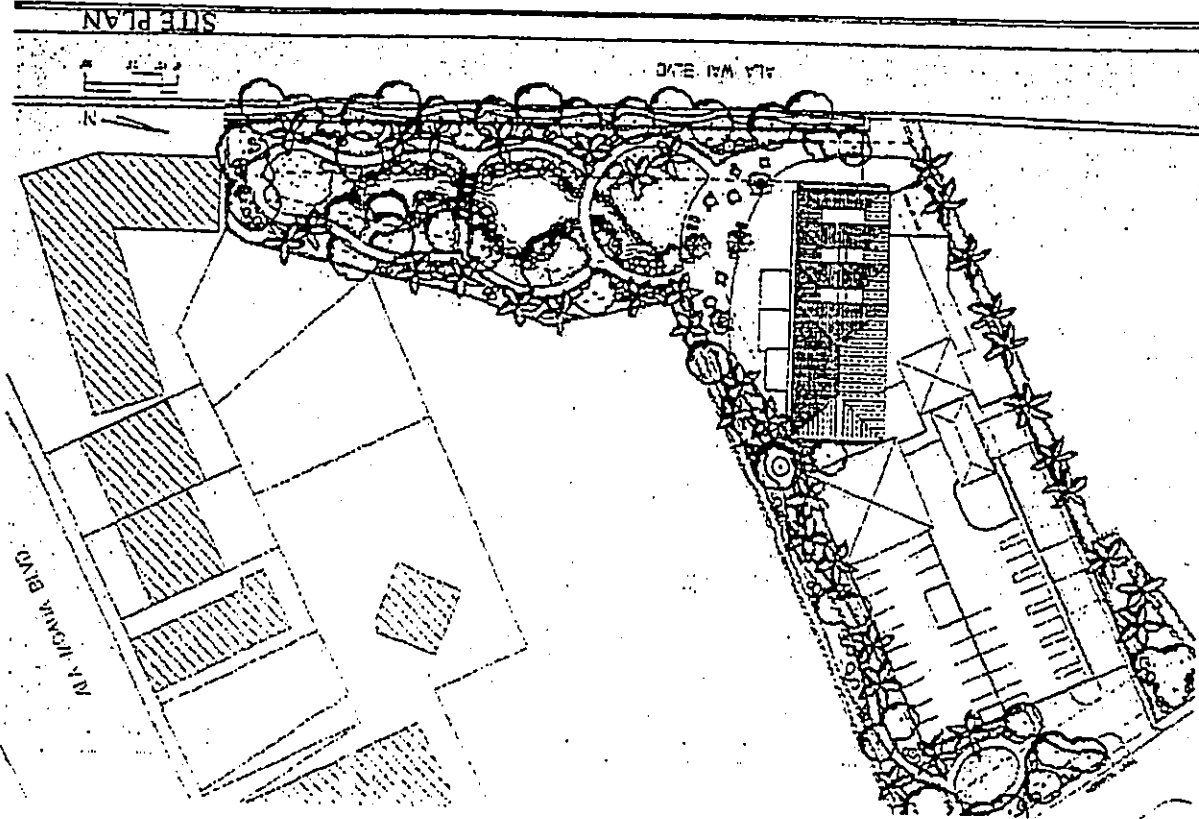
Thank you for your consideration of these issues.

Theodore Riess

Corinne Villa-Riess

Cc: Honolulu Dept of Planning and Permitting, Hawaii Office of Environmental Quality Control

(808) 949-9708 tvillariess@msn.com (808) 286-5056/5086





GERALD PARK
Urban Planner

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- Studies

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geraldpark@aol.com

October 10, 2003

Mr. and Mrs. Theodore Riese
1645 Ala Wai Boulevard, 1205
Honolulu, Hawaii 96815-

Dear Mr. and Mrs. Riese:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

Affordable Housing for the Elderly

The Kapiolani Akahi CCRC has never been represented as affordable housing for the elderly. It is, as you indicate, an upscale development that requires a substantial up front cost and monthly maintenance fee. It should also be pointed out that 90% of the entry fee for an apartment would be refunded when the resident vacates the apartment.

Waikiki Development

The podium and tower are set back from Ala Wai Boulevard a minimum of 15 feet as required by the zoning code. In addition, all tower levels have been set back an additional 26 feet above the 40-foot height level to add interest to the vertical building facade. The tower will feature pitched roofs to further add architectural interest and a visual sense of an old-style Hawaiian dwelling.

Absence of Urban Planning

The Hobron area of Waikiki is transitioning from a low-rise, low-density residential and commercial setting to a mixed use high-density living and working environment. The future form of the area is presented in the Waikiki Special District Ordinance and the mixed-use resort and high-density apartment and commercial use designations for the area. The Kapiolani Akahi is proposed in this area because the high-density aspects of the project are consistent with the desired public uses of the area expressed in city plans for the area and land use controls.

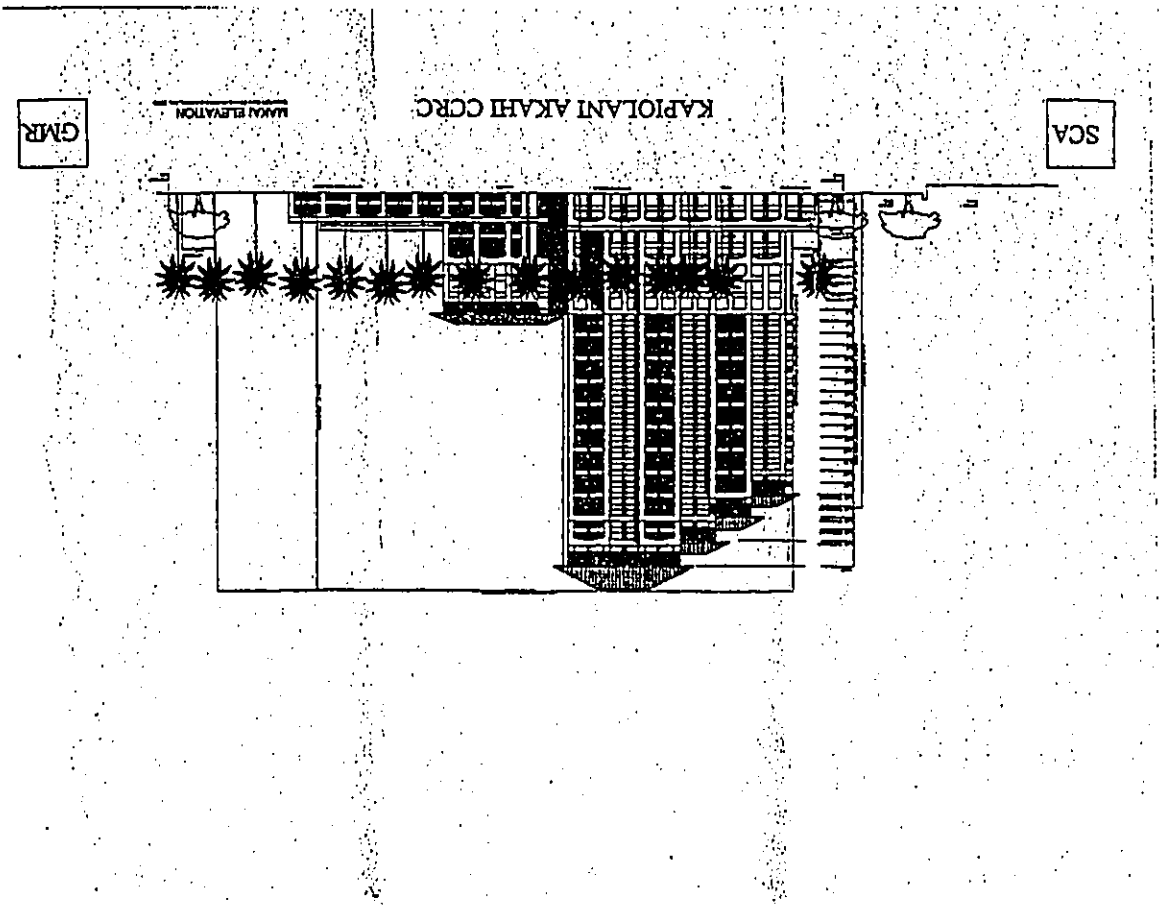
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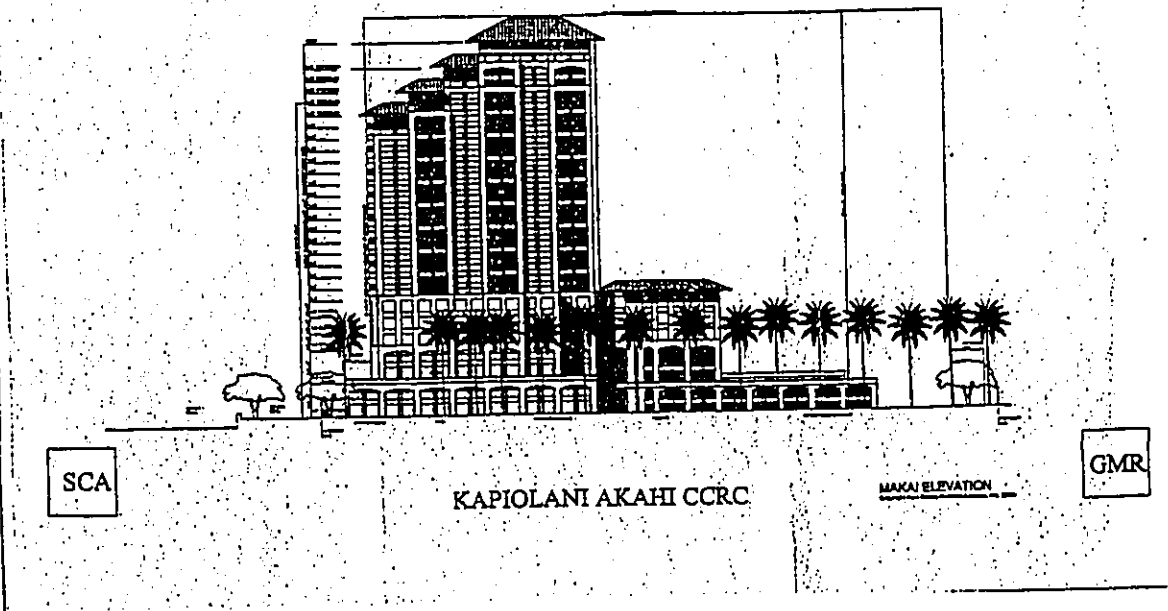
Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Gerald Park

c: D. Graham, GMR/VRH/HSI





October 10, 2003

Mr. and Mrs. Theodore Riese
1645 Ala Wai Boulevard, 1205
Honolulu, Hawaii 96815-

Dear Mr. and Mrs. Riese:

Subject: Kapiolani Akahi CCRC
TRAK: 2-6-011-002, 004
WAIKIKI, OAHU, HAWAII

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. Responses to your comments are provided in the order presented.

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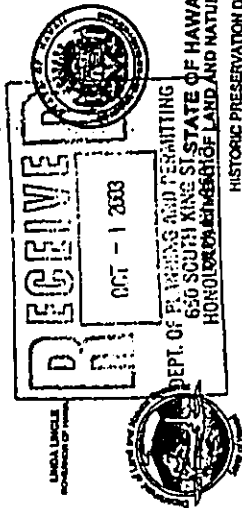
Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park
Gerald Park

c: D. Graham, GMR/JNH/HSI

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PETER T. YOUNG
DIRECTOR
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STATE OF HAWAII
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

DALE CALVERT
DEPUTY DIRECTOR - LAND
DEPARTMENT OF PLANNING AND PERMITTING
STATE OF HAWAII
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

ROBERT YIM LAU
DEPUTY DIRECTOR - PERMITTING
DEPARTMENT OF PLANNING AND PERMITTING
STATE OF HAWAII
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

DEPARTMENT OF PLANNING AND PERMITTING
STATE OF HAWAII
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

September 24, 2003

Eric G. Crispin, Director
Department of Planning and Permitting
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Crispin:

SUBJECT: Chapter 6E-42 Historic Preservation Review - Draft Environmental Assessment for the Kapi'olani Akahi CCRC project 362 Hobron Lane Waikiki, Kona, O'ahu
TMK: (1) 2-6-011:002 & 004

LOG NO: 2003.1666
DOC NO: 0309E102

Thank you for the opportunity to comment on the draft Environmental Assessment (DEA) for the proposed new senior living facility. Our review is based on historic reports, maps, and aerial photographs maintained at the State Historic Preservation Division; no field inspection was made of the project areas. We received the DEA for comment on August 4, 2003, and subsequent information regarding the project in September. We apologize for the delay in our comments.

The project proposes the construction of a 26-story residential/nursing tower and parking structure on land previously occupied with low-rise apartment buildings. The buildings were demolished in 1998 and the parcels have been vacant since that time. The Soil Conservation Service soil map indicates that these lands as comprised of fill soils and according to the DEA an agent of the owner identified the fill as spoil from the dredging of the Ala Wai Canal.

A review of our records shows that there are no known historic sites at this location. However, human burials have been found in Jaucas sand deposits during the excavation of a light pole near the corner of Hobron and Ena Road as well as during redevelopment of the Fort DeRussy area. Because of these recent findings the applicant has agreed to conduct an archaeological inventory survey with subsurface testing of the parcel. We look forward to reviewing the results of the inventory survey in order to determine if

Eric G. Crispin, Director
Page Two

historic sites are present and if so, to gather sufficient information to evaluate their significance. An acceptable report of the finds should be submitted to the State Historic Preservation Division. If significant historic sites are found during the survey, a mitigation plan may need to be developed and executed.

Should you have any questions regarding archaeology, please feel free to call Sara Collins at 692-8026 or Elaine Jourdan at 692-8027. Should you have any questions regarding burial matters please feel free to call Kamana'o Mills at 587-0010.

Aloha,

P. Holly McEldowney

P. Holly McEldowney, Acting Administrator
State Historic Preservation Division
EJjk

c. Van Horn Diamond, OIBC
Kat Markell/Kamana'o Mills, SHPD Burial Sites Program



GERALD PARK
Urban Planner

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■ Land Use
■ Research
■ Environmental
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■ Telephone:
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■ Facsimile:
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■ e-mail:
geraldpark@aol.com

October 10, 2003

P. Holly McElDowney, Acting Administrator
Historic Preservation Division
Department of Land and Natural Resources
State of Hawaii
555 Kakuhihewa Building
601 Kamohila Boulevard
Kapolei, Hawaii 96707

Dear Ms. McElDowney:

Subject: Kapiolani Akahi CCRC
TMK: 2-6-011: 002, 004
Waikiki, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject project. As indicated by your comment, Honolulu Neighborhood Housing Services, Inc. will conduct an archaeological inventory survey of the subject properties. The archaeological contractor will be contacting your office to develop appropriate strategies for conducting the survey.

We thank the State Historic Preservation Division for participating in the environmental assessment review process.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

Gerald Park
Principal

c: D. Graham, GMR/HNHSI