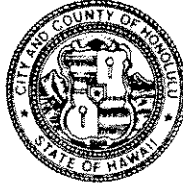


DEPARTMENT OF PLANNING AND PERMITTING  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR HONOLULU, HAWAII 96813  
Phone: (808) 523-4414 Fax: (808) 527-6743

JEREMY HARRIS  
MAYOR



March 11, 2004

RECEIVED  
ERIC G. CRISPIN, AIA  
DIRECTOR  
BARBARA KIM STANTON  
DEPUTY DIRECTOR  
'04 MAR 15 P1:05  
KATHY SOKUGAWA  
ACTING DEPUTY DIRECTOR  
2003/ED-23(gu)  
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 PERMIT, CHAPTER 343, HRS  
Environmental Assessment (EA) Determination

Recorded Owner/	:	
Applicant	:	Robertson Properties Group
Agent	:	PlanPacific, Inc.
Tax Map Keys	:	2-6-22: 9, 14 & 24
Location	:	2280 Kalakaua Ave. (parcel 9) 325 Seaside Ave. (parcel 14) 333 Seaside Ave. (parcel 24)
Request	:	Waikiki Special District Permit (Major)
Proposal	:	Construct a new building on parcel 9 (site of former Waikiki Theater 3), which will contain retail businesses and restaurants

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.

We have enclosed a completed OEQC Bulletin Publication Form, Project Description, and four copies of the Final EA. Should you have any questions, please contact Geri Ung of our staff at 527-6044.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Eric G. Crispin", written over a horizontal line.

ERIC G. CRISPIN, AIA  
Director of Planning  
and Permitting

EGC:pl  
Encl.

doc. 276639

2004-04-08 FONSI  
WAIKIKI KALAKAUA RETAIL

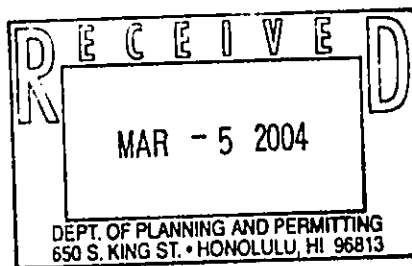
APR 8 2004

FILE COPY

**FINAL ENVIRONMENTAL ASSESSMENT**  
**for Waikīkī Kalākaua Retail**

Address: 2284 Kalākaua Avenue

TMKs: 2-6-22:009, 014, and 024



Prepared For:  
The Robertson Properties Group

Prepared By:  
PlanPacific, Inc.

January 2004 (Revised)

**FINAL ENVIRONMENTAL ASSESSMENT**  
**for Waikīkī Kalākaua Retail**

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January 2004 (Revised)

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**APPENDICES**

A	Draft EA Comment & Response Letters
B	Conceptual Landscape Plan
C	Archaeological and Cultural Impact Assessment
D	Letters from State Historic Preservation Division
E	Letter from Julian Ng, Traffic Engineer

## 1. PROJECT SUMMARY

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<b>Project Name:</b>	Waikīkī Kalākaua Retail
<b>Landowner:</b>	CP Properties 120 N. Robertson Boulevard Los Angeles CA 90048
<b>Developer/Applicant:</b>	The Robertson Properties Group 120 N. Robertson Boulevard Los Angeles CA 90048 Contact: Tim Kolvoord 310-855-8484
<b>Tax Map Key</b>	2-6-022: 009, 014, and 024
<b>Area:</b>	43,628 square feet (parcel 009); 20,511 square feet (parcel 014); and 34,771 square feet (parcel 024)
<b>Existing Use:</b>	Vacant structures; site of former Waikīkī Theaters and IMAX
<b>Proposed Use:</b>	Retail
<b>State Land Use:</b>	Urban District
<b>Development Plan:</b>	Resort Mixed Use
<b>Zoning District:</b>	Resort Commercial Precinct, Waikīkī Special District
<b>SMA:</b>	The project is <u>not</u> located within the Special Management Area
<b>Special District:</b>	The project is located within the Waikīkī Special District
<b>Action Requested:</b>	Environmental Assessment processed in compliance with Chapter 343, Hawai'i Revised Statutes and Hawai'i Administrative Rules, Title 11, DOH, Chapter 54
<b>Approving Agency:</b>	Department of Planning and Permitting 650 South King Street Honolulu, Hawai'i 96813
<b>Agencies Consulted:</b>	<u>City and County of Honolulu</u> : Board of Water Supply, Environmental Services Department, Facility Maintenance Department, Fire Department, Department of Planning and Permitting, Police Department, Department of Transportation Services, Office of Waikīkī Development

**Agencies Consulted  
(cont.):**

State of Hawai'i: Department of Business, Economic Development, and Tourism; Department of Land and Natural Resources; Historic Preservation; Department of Trans.

Others: Queen Emma Foundation, Waikiki Business Plaza, Waikiki Improvement Association, Waikiki Neighborhood Board No. 9

**Anticipated  
Determination:**

Finding of No Significant Impact (FONSI)

## **2. GENERAL DESCRIPTION OF THE ACTION'S CHARACTERISTICS**

---

### **2.1 TECHNICAL CHARACTERISTICS**

#### **Description of the Property**

The property consists of three adjacent parcels located in the middle of Waikīkī, one fronting Kalākaua Avenue and two fronting Seaside Avenue (see Figure 1). The Tax Map Keys are 2-6-22:009, 014, and 024. The three properties are linked together under a joint development agreement, which means that for zoning purposes they are treated as a single lot (reference DPP File 89/CUP1-64). Parcel 9 is 43,628 square feet in size and located along Kalākaua Avenue. Parcels 14 and 24 are 20,511 and 34,771 square feet in size, respectively, and located along Seaside Avenue.

Immediate adjacent uses are Waikīkī Business Plaza to the west ('Ewa direction), Duke's Lane and Waikīkī Beachcomber Hotel to the east (Diamond Head direction), Kalākaua Avenue and Royal Hawaiian Shopping Center to the southwest (makai), and the Waikīkī Trade Center to the north/northwest (mauka).

The Development Plan Land Use Map designations for the properties are Resort/Commercial and Zoning is Resort Commercial Precinct, Waikīkī Special District. The properties lie outside of the Special Management Area and within the Waikīkī Special District.

This Environmental Assessment is warranted by the construction of a new building on TMK 2-6-22:009. While the document will address parcels 14 and 24 and the impacts that use of these parcels may have in combination with the impacts anticipated for parcel 9, the central focus of this document is on the new building and proposed uses for parcel 9. Existing buildings on parcels 14 and 24 will remain, with some new commercial uses and some interior renovations.

Parcel 9 is somewhat rectangular in shape, with the shortest side fronting Kalākaua Avenue. The Waikīkī Theater 3 building (which includes two separate retail tenants on each front corner) occupies most of the lot, with the rear (mauka) portion covered partially by the former Waikīkī Theaters 1 & 2 and the parking structure. The open area between the Waikīkī Theater 3 building and Duke's Lane is paved and lined with mature trees. Several individual vendors operating from small kiosks occupy this paved area.

Parcel 24 contains most of the Waikīkī Theaters 1 & 2 building and the parking structure shared by all three properties. Parcel 14 contains a portion of Waikīkī Theaters 1 & 2 building and most of the IMAX building (see Figure 3). Vehicular access, loading areas, pedestrian circulation, and parking are shared among the three parcels.

A pedestrian pathway runs mauka from Kalākaua Avenue between the Waikīkī Business Plaza and the Waikīkī Theater 3 building. This pathway includes a 10-foot-wide easement for pedestrian access over the Waikīkī Business Plaza property (TMK 2-6-022: 003) recorded in favor of the subject property (see Figures 2 and 3).



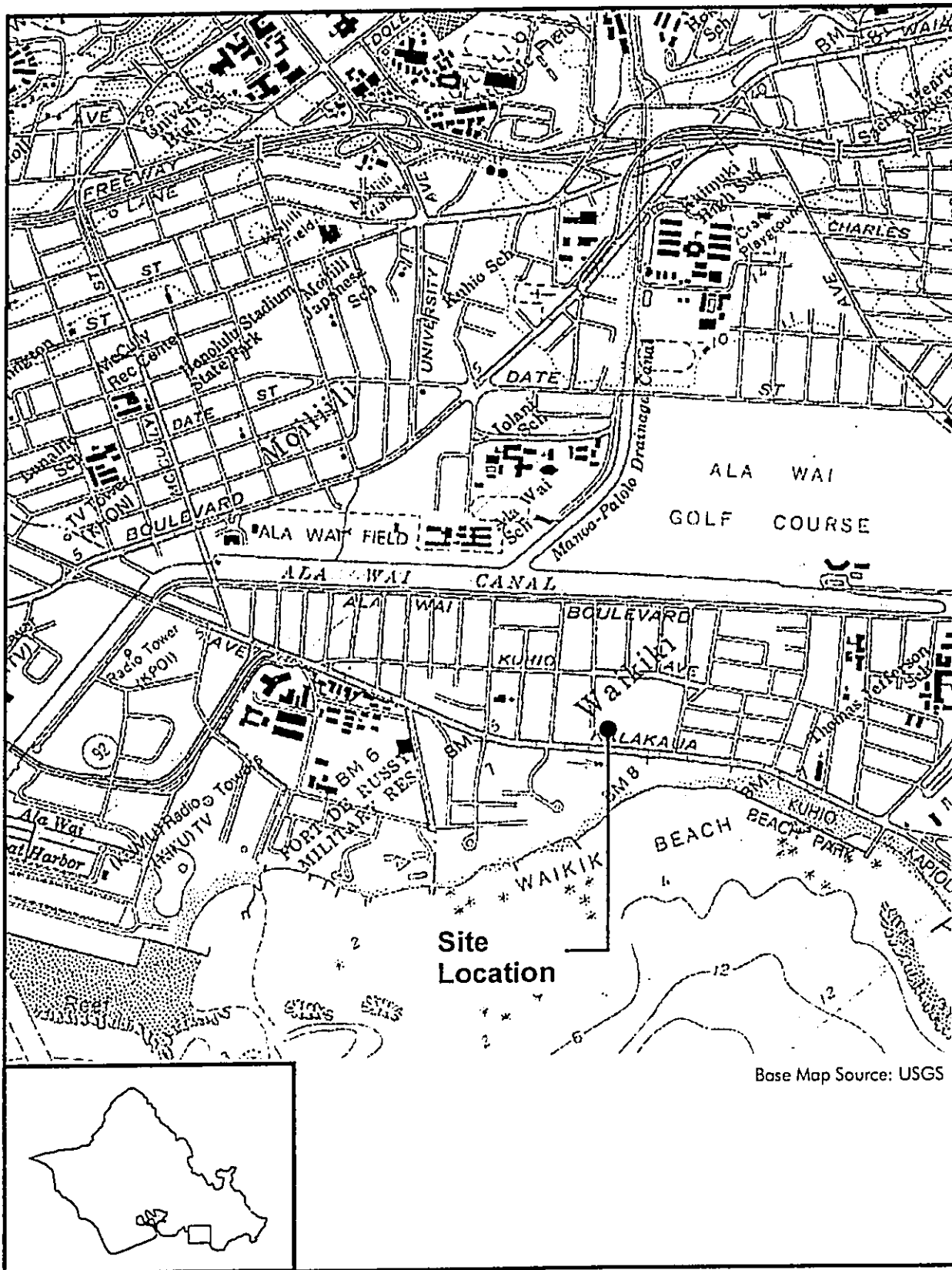


Figure 1: Location Map

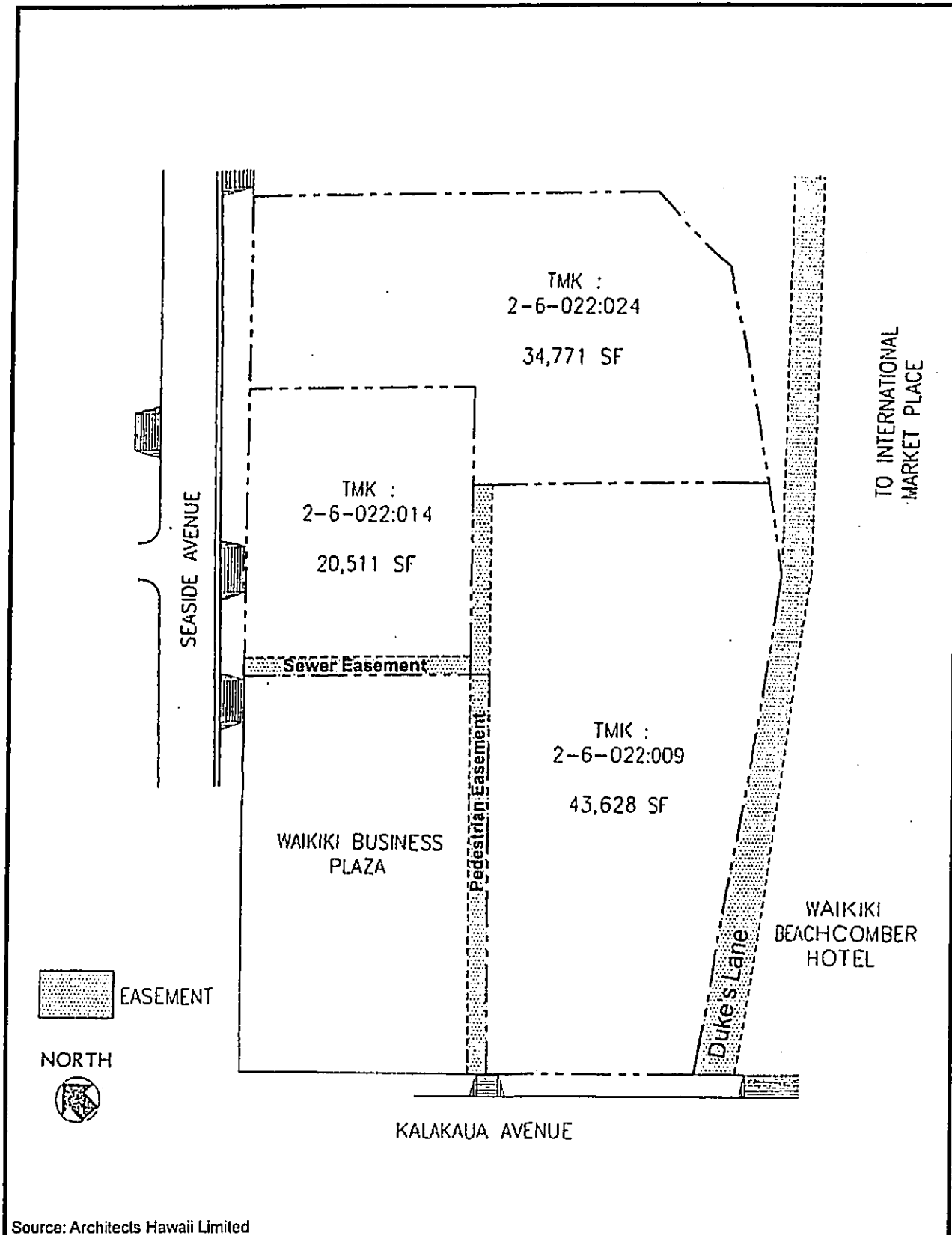
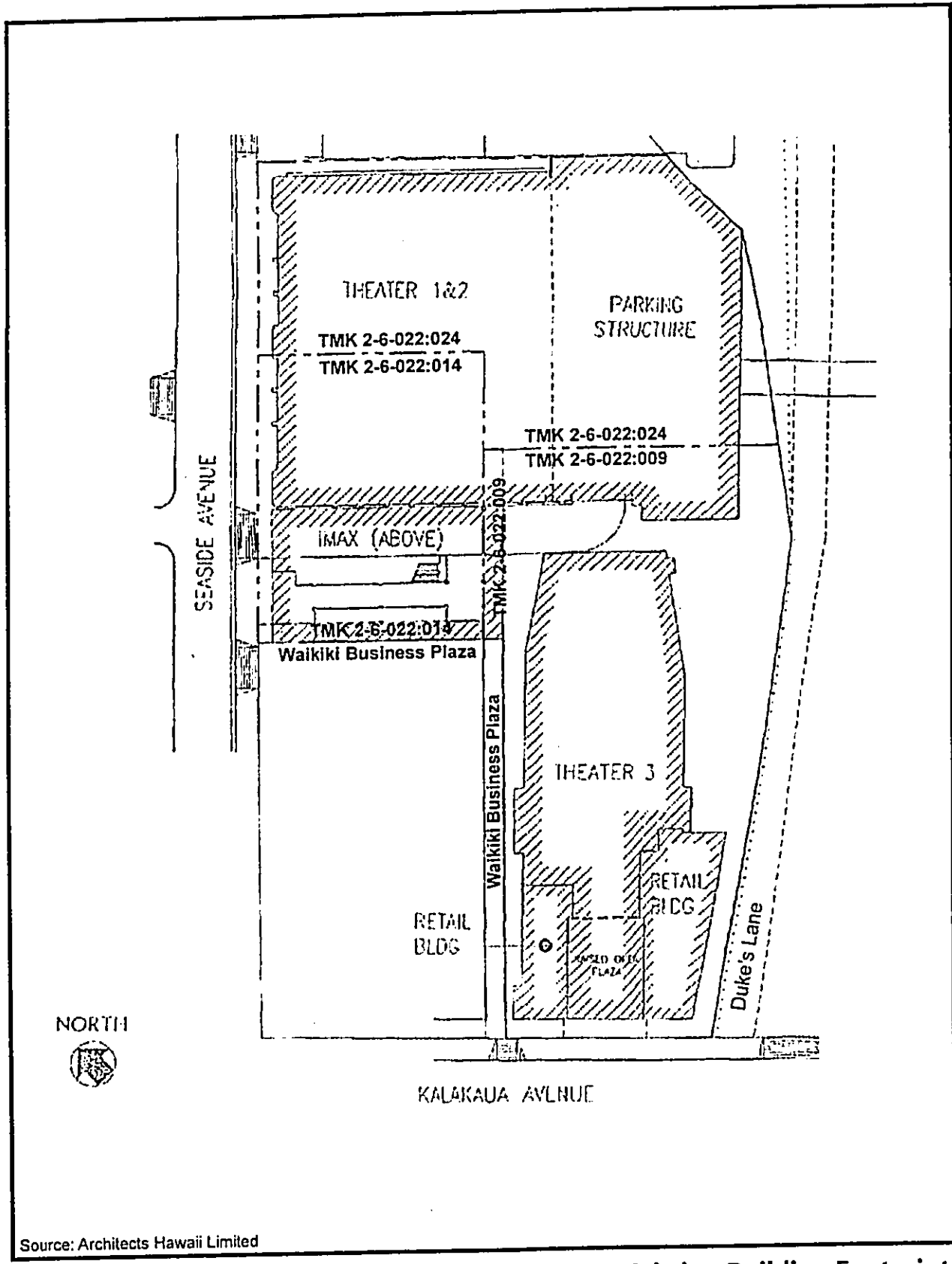


Figure 2: TMKs and Location of Easements



**Figure 3: Existing Building Footprints**

### **Background and Description of the Project**

Consolidated Theaters closed the Waikiki Theaters 1, 2, and 3 in November 2002. These older theaters were no longer profitable with the high Waikiki land values and competition from new multiplex theaters with stadium seating. Title to the properties was transferred to CP Properties, a real estate holding company affiliated with Consolidated Theaters. The Robertson Properties Group (RPG), an affiliated real estate development company, is the developer of the property. RPG and CP Properties are both California companies and share the same address in Los Angeles.

RPG evaluated the existing structures for potential redevelopment to retail and other commercial uses. The Waikiki Theater 3 building was judged to be infeasible for redevelopment because of its design, age, and siting on the property. Frontage on Kalakaua Avenue is especially valuable for high-volume commercial uses, and it is highly taxed as well. Reuse of the Waikiki Theater 3 site would also allow for development of adequate loading facilities.

The owner submitted an application to demolish the Waikiki Theater 3 building. After consultation with the State Historic Preservation Division (SHPD), the City Department of Planning and Permitting granted a minor special district permit in February 2003 (DPP File 2003/SDD-1) and a demolition permit in March 2003. At that time, RPG had not yet formulated plans for a new building.

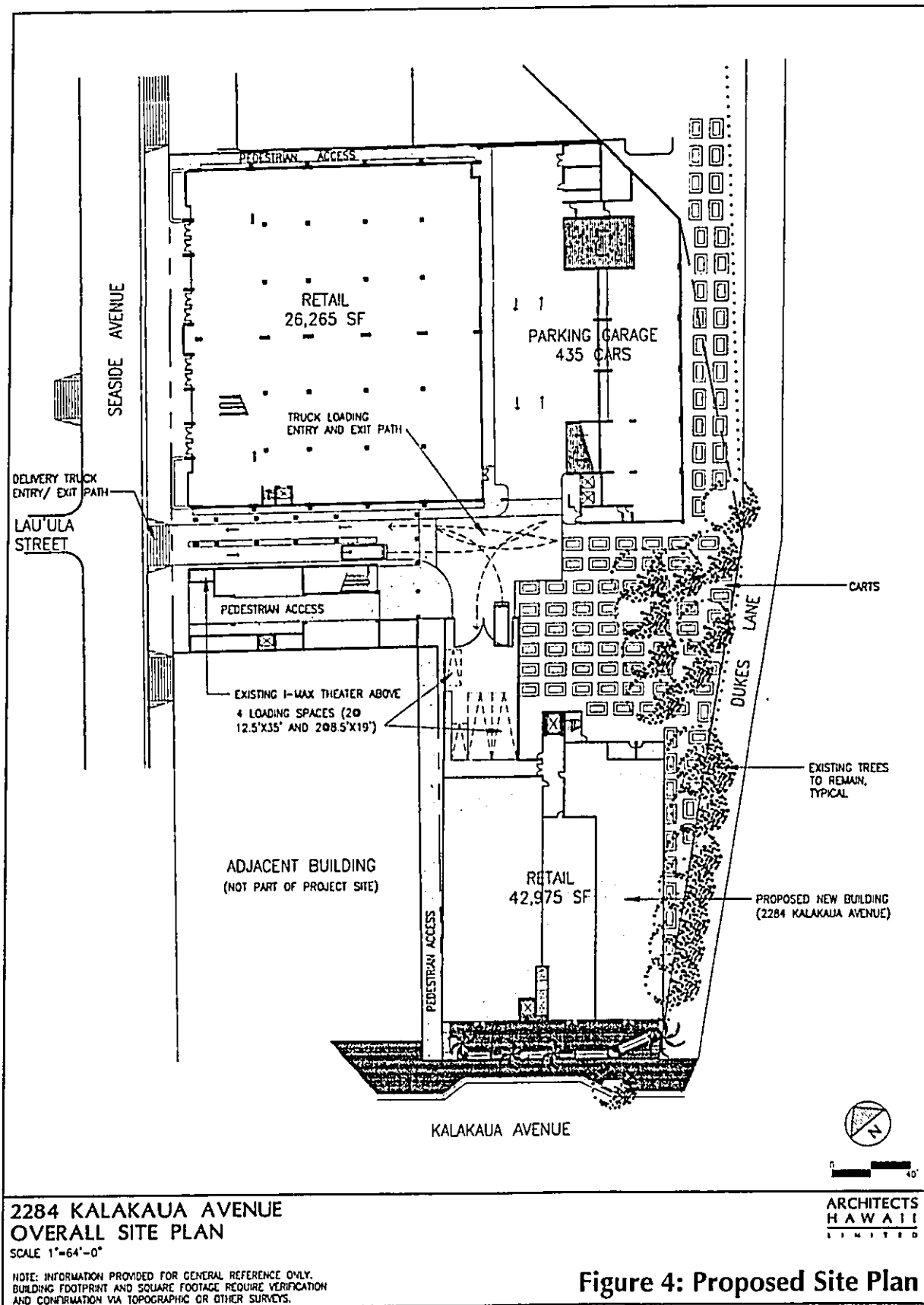
Demolition is proceeding in phases. In March and April, the owner salvaged various items and took documentary photographs of the interior, as agreed with SHPD. From May through July, a contractor specializing in hazardous material removal performed asbestos abatement, removing interior plaster and pipes.

At present, the owner is in negotiation with prospective tenants and has formulated plans for the creation of a new structure to house retail businesses and restaurants. The proposed building is planned for three stories and will have a footprint of 15,770 sf, covering a smaller percentage of the lot than the existing building. When plans are finalized, however, it is possible that the size of the structure could be reduced to one or two stories.

Because the site is located in flood hazard district AE with a base flood elevation of six feet, the ground floor of the building will be raised on an 18-inch podium above the sidewalk. The sidewalk elevation has been surveyed at 4.55 feet. The podium will have both steps and a ramp and will be landscaped.

Figure 4 shows the proposed site plan and Figures 5, 6, and 7 show the proposed floor plans. Figure 8 shows the Kalakaua Avenue elevation.

Demolition will also include the two corner additions facing Kalakaua Avenue in addition to the original theater building. Shops in these spaces continue to operate at this time.



**Figure 4: Proposed Site Plan**

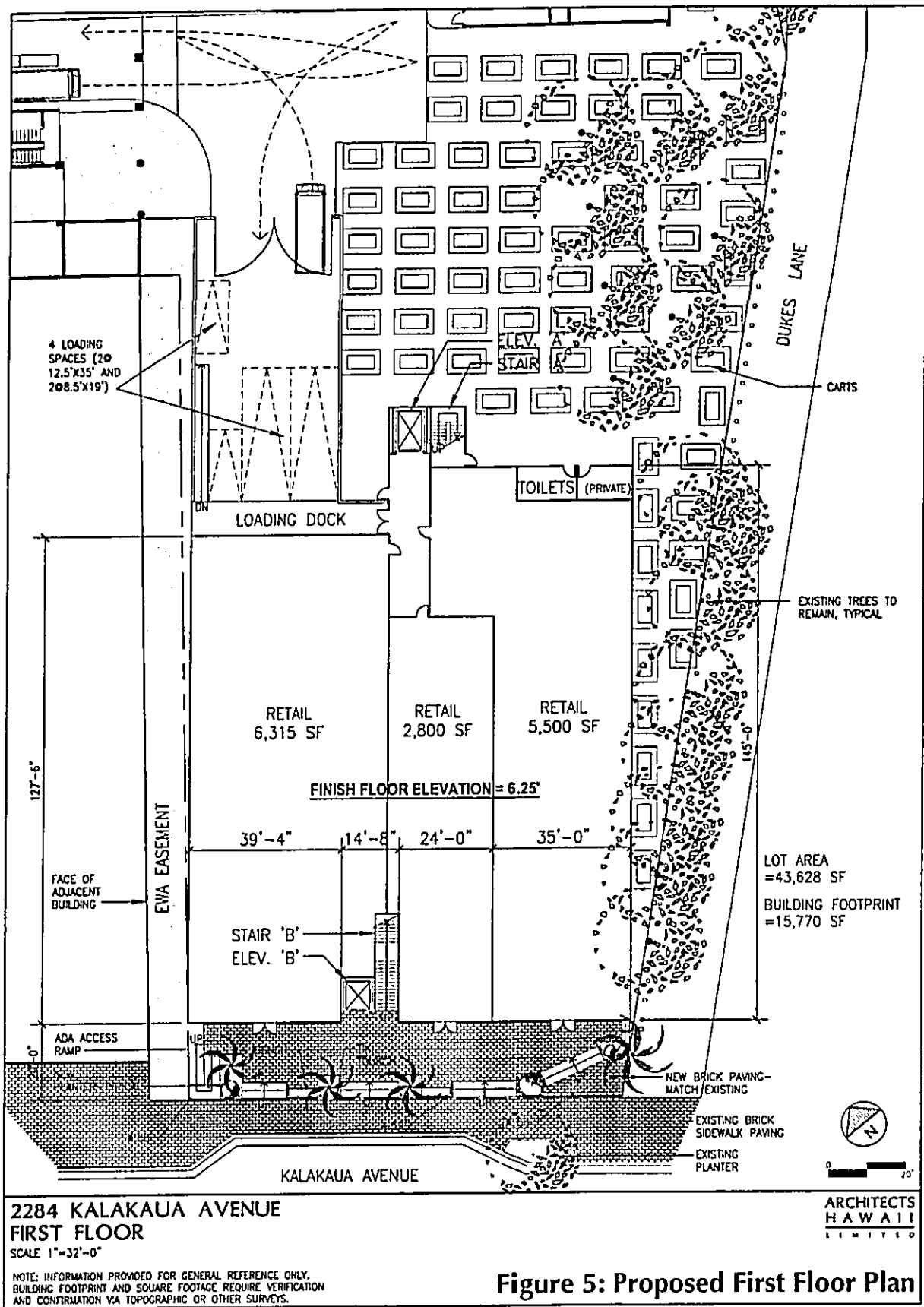
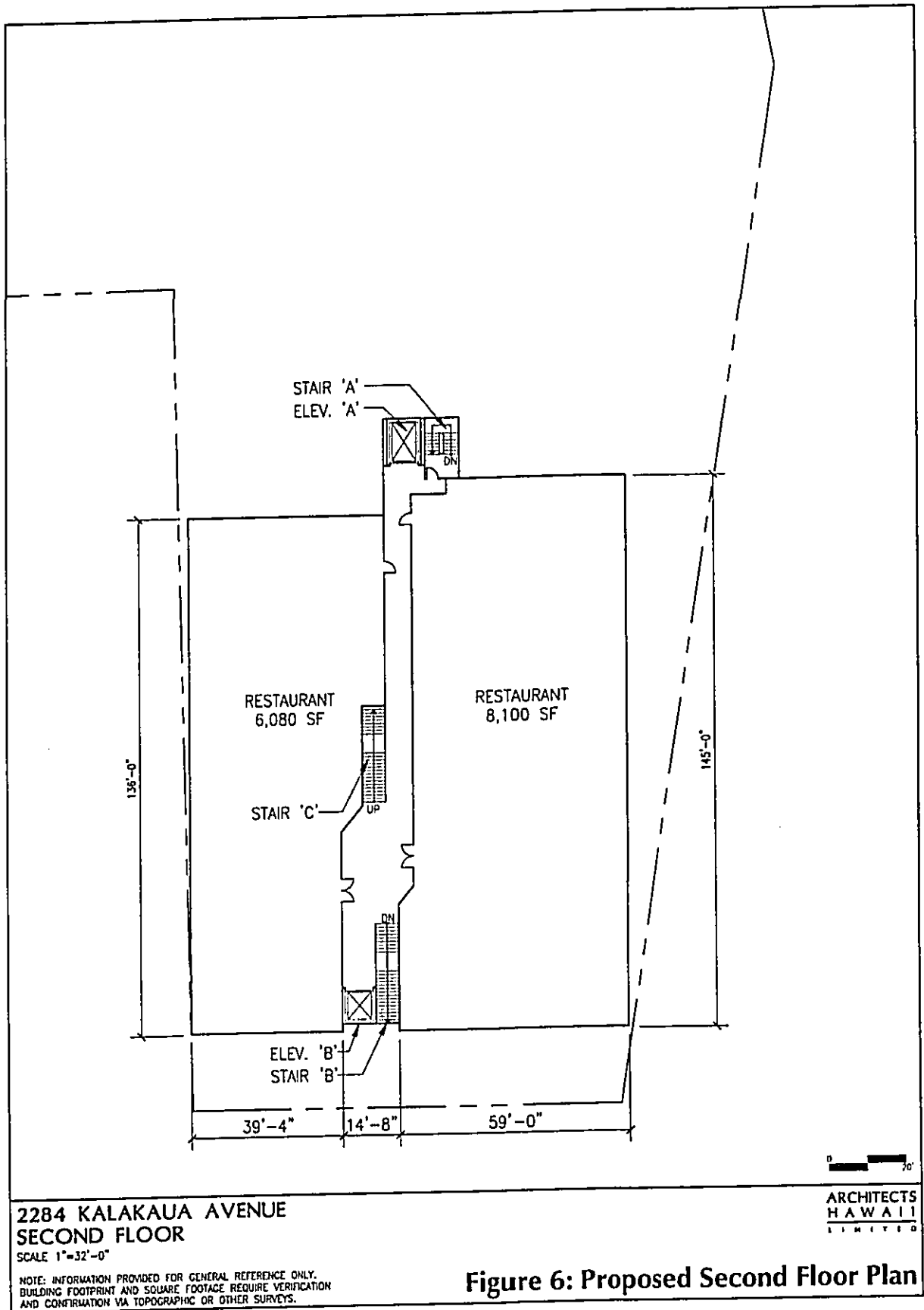


Figure 5: Proposed First Floor Plan



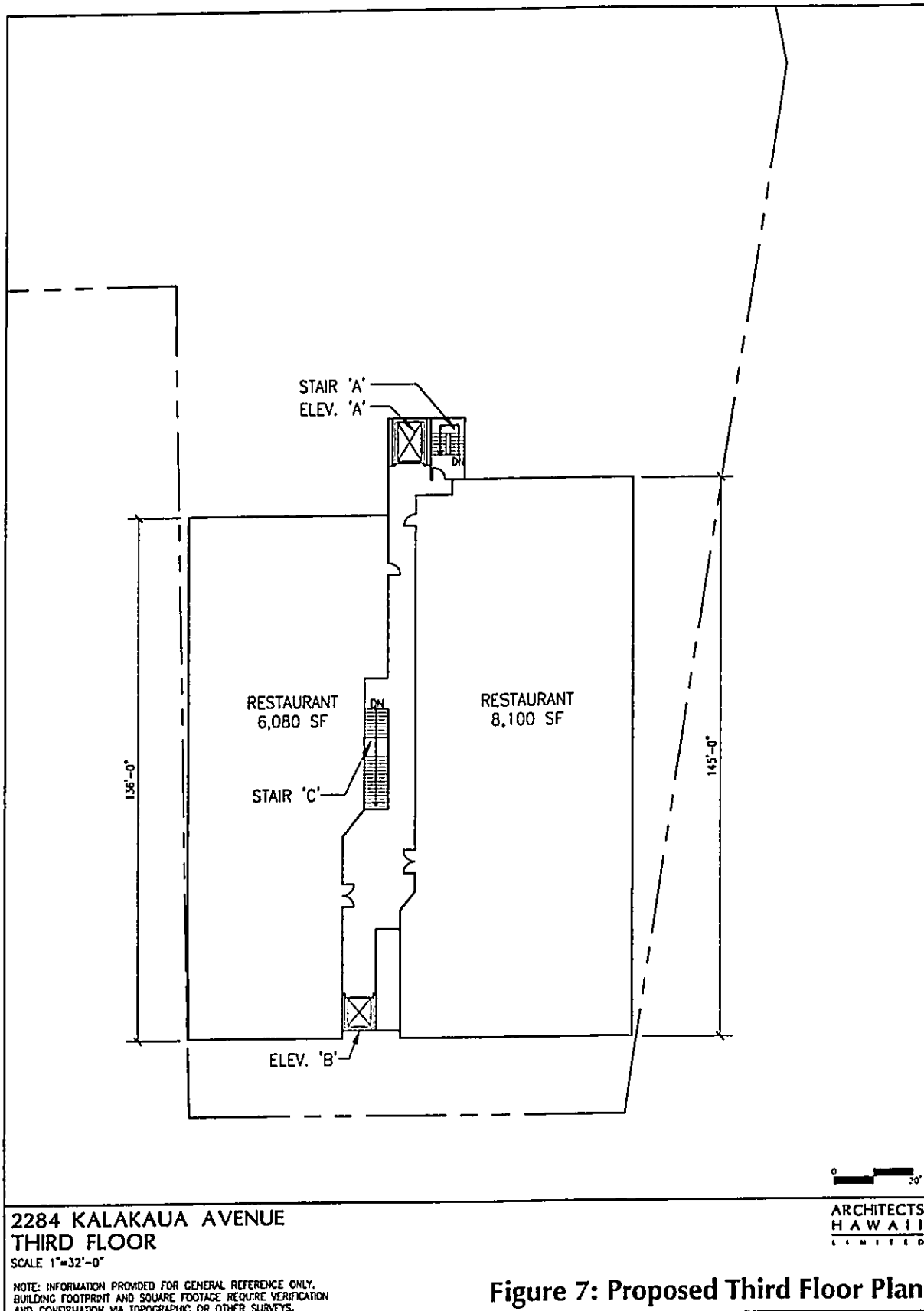
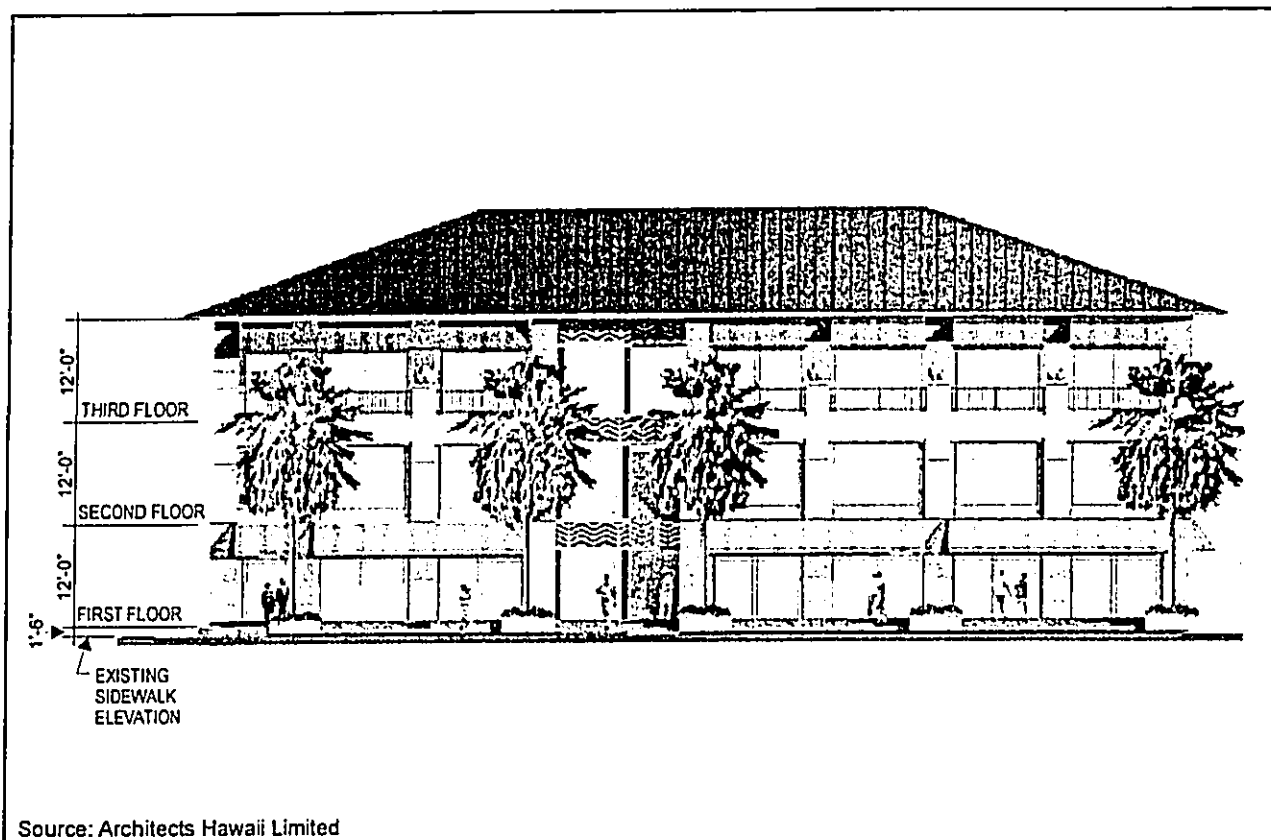


Figure 7: Proposed Third Floor Plan





**Figure 8: Proposed Elevation**

There are currently 47 vendors operating from kiosks on the subject property. After redevelopment, the increased amount of open space will allow a maximum total of 79 kiosks. Most of the existing kiosk vendors will continue to use the rear portion of the property during construction of the new building.

The kiosks will have standard dimensions of seven feet long and three-and-a-half feet wide; roof eaves extend an additional one-and-a-half feet on each side. Each kiosk will be provided with electrical power and telephone connection from underground conduits. While they can be relocated, the kiosks are designed to remain in place and can be fully secured when not in use. Hours of operation are morning through night; they generally remain open as long as there are shoppers in the streets.

At the present time, the owner plans to retain the building that formerly housed Waikīkī Theaters 1 & 2, the IMAX building, and the parking structure. The building that formerly housed Waikīkī Theaters 1 & 2 has 26,265 square feet of floor area. The interior theater improvements have been demolished (under a separate demolition permit), and the building will undergo renovation in order to accommodate new retail uses.

Note that two City studies have identified potential future uses of the Waikīkī Theaters 1 & 2 building. The Bus Rapid Transit Project has identified it as a "proposed Bus Rapid Transit Terminal," where buses would load and unload passengers. The Waikīkī Livable

Community Project has identified it as a "Passenger and Freight Loading Center."

The IMAX operation has been suspended and may or may not resume. It currently occupies about 13,400 square feet of floor area on the upper floors of the building. The ground floor of the IMAX Theater houses two retail tenants (1,600 square feet), one on either side of a covered walkway that links the interior of the property to Seaside Avenue. The owner intends to retain the building and will consider future possibilities for commercial use.

The 435-stall parking garage will remain unchanged. Parking will be used by employees and customers of businesses located on the three parcels, as well as by the general public. Under the Waikīkī Special District, required parking for all three parcels, including the proposed building, would be about 110 stalls (total floor area of about 88,000 sf @ one stall per 800 sf). As in the past, the remaining stalls are and will continue to be available for rent by the general public. This centrally-located garage constitutes a significant component of Waikīkī's parking supply.

The Seaside Avenue driveway will continue to provide access to the parking structure, as well as to new loading bays located between the rear of the proposed new building and the parking structure. Figure 4 shows truck access and avenues for pedestrian circulation at the center of the property, between the three commercial buildings and the parking structure.

Most of the existing landscaping is located at the perimeter of the site and will be retained. See Appendix B for the conceptual landscape plan.

### **Construction**

Current plans for the proposed new structure call for steel frame construction on a concrete slab-on-grade foundation. Upper floors will be built of light-weight concrete over metal decking. The foundation will utilize continuous wall footings, with spread footings at columns to a depth of about two feet.

The total construction cost of the various proposed components is estimated at \$6.7 million. Funding will be from private sources and no state or county funds will be involved. Construction is expected to begin in June 2004 and to be completed by July 2005. The construction timetable is subject to change due to financing and development conditions.

## **2.2 ECONOMIC AND SOCIAL CHARACTERISTICS**

Redevelopment within Waikīkī is a continual process as structures age and the preferences of tourists and residents change. It is the goal of the City and County of Honolulu to revitalize the area and make it an attractive place and destination. The proposed project reflects the changing economic and social characteristics of the area and will contribute to revitalization.

The proposed uses would provide new jobs primarily in the retail sector. Roughly 260 employees would be needed for the stores and restaurants anticipated to occupy the new building. An additional 32 kiosk vendors would also be accommodated on the site. Within the former Waikīkī Theaters 1 & 2 building, another 40 employees may be needed for anticipated retail operations. Temporary jobs related to construction also will be created. Temporary displacement of some kiosk vendors – 3 minimum and 15 maximum – would occur during construction. The two existing retail tenants fronting Kalākaua will relocate elsewhere.

### 2.3 HISTORIC AND CULTURAL CHARACTERISTICS

Cultural Surveys Hawai'i, Inc., prepared an archaeological assessment and cultural impact assessment of the project site, which is included as Appendix C. The owner also consulted with the State Historic Preservation Division about the Waikīkī Theatre building prior to obtaining a demolition permit for that structure.

#### Archaeological Resources

According to the archaeological assessment prepared for this project (Appendix C), the ahupua'a of Waikīkī, in the centuries before the arrival of Europeans, was an intensely-utilized area having abundant natural and cultivated resources that supported a large population. In the nineteenth and early twentieth centuries, after a period of depopulation, Waikīkī was reanimated by Hawaiians and foreigners residing there, and by farmers continuing to work the irrigated field system that had been converted from taro to rice.

Farming continued up to the first decades of the twentieth century until the Ala Wai Canal drained the remaining ponds and irrigated fields. Remnants of the pre-contact and historical occupation of Waikīkī have been discovered and recorded in archaeological reports, usually in connection with construction activities related to urban development, or infrastructural improvements. These discoveries, which have occurred throughout Waikīkī, have included many human burials, traditional Hawaiian and historic, as well as pre-contact Hawaiian and historic cultural deposits (see Figure 8 of Appendix C).

In summary, past archaeological research, from the beginning of the 20th century to the present, has produced evidence that traditional Hawaiian cultural deposits, historic trash deposits, and, most notably, human burials, do exist throughout the breadth of the Waikīkī area.

Soils underlying the current project area are listed as Jaucas Sand (JaC). Soils of the Jaucas Series have been documented to contain human burials. Recent excavations related to the Waikīkī Anti-Crime Lighting Project indicated the presence of Jaucas Sand immediately makai of the project area on Kalākaua Ave. Four *in situ* human burials were encountered and documented within this naturally-deposited beach sand matrix. A single human burial was encountered in the vicinity of the current project area on Kalākaua Avenue, fronting the Waikīkī Beachcomber hotel.

A review of the original architectural plans for the Waikīkī Theater 3 indicated areas of possible previous disturbance of the underlying sediments. In the raised "courtyard" area fronting the auditorium, the plans indicated a "4-inch [concrete] slab on fill." The floor area in front of the screen stage area also indicated a "4-inch [concrete] slab on fill." In addition, the plans indicated relatively shallow excavations (approximately 2 feet below street level) for the footings of the major structural columns around the perimeter of the Waikīkī Theater 3 building. Generally, it appears that the majority of the Waikīkī Theater 3 structure lies upon fill land built up over the natural sediment.

Due to the likely presence of undisturbed Jaucas Sand deposits underlying the project area, as well as documented human burials in the vicinity, subsurface ground disturbing activities in the project area may encounter historic properties including traditional Hawaiian cultural deposits, historic trash deposits, and human burials.

#### **Historic Resources**

Designed by C.W. Dickey in 1936 and originally featuring a unique interior décor, the Waikīkī Theater 3<sup>1</sup> was proposed for listing on the Hawai'i Register of Historic Places in 1979. The Hawaii Historic Places Review Board decided not to list the property and not to nominate it for the National Register. In the 1980s, the theater was substantially renovated; additions were made on the front of the building, and much of the original interior was changed. Because of the age and history of the building, the City's "Waikīkī Special District Design Guidelines" document includes Waikīkī Theater 3 in its listing of "Historic Structures".

After examining the building in January 2003, the State Historic Preservation Division (SHPD) concurred with the proposed demolition of the building, but recommended salvaging certain items and documenting other features with photographs. In a letter dated January 30, 2003, the SHPD stated, "While the theater has undergone numerous changes, there are still several items worth salvaging." In a letter dated March 4, 2003, the SHPD concurred with the salvage plan proposed by the owner. (SHPD letters are included in Appendix D.) As of publication of the Final EA, all documentation and salvage work has been completed except for the decorative grills, which will be salvaged when the exterior shell is demolished.

#### **Cultural Resources**

According to the archaeological and cultural impact assessment prepared for this project (Appendix C), there are no on-going traditional cultural practices taking place on the subject property. Because the project area has been extensively developed, the traditional and cultural practices typically studied in a cultural impact assessment (i.e. gathering rights for cultural and religious purposes, plant resources, water rights, access issues related to gathering) were found to be virtually non-existent.

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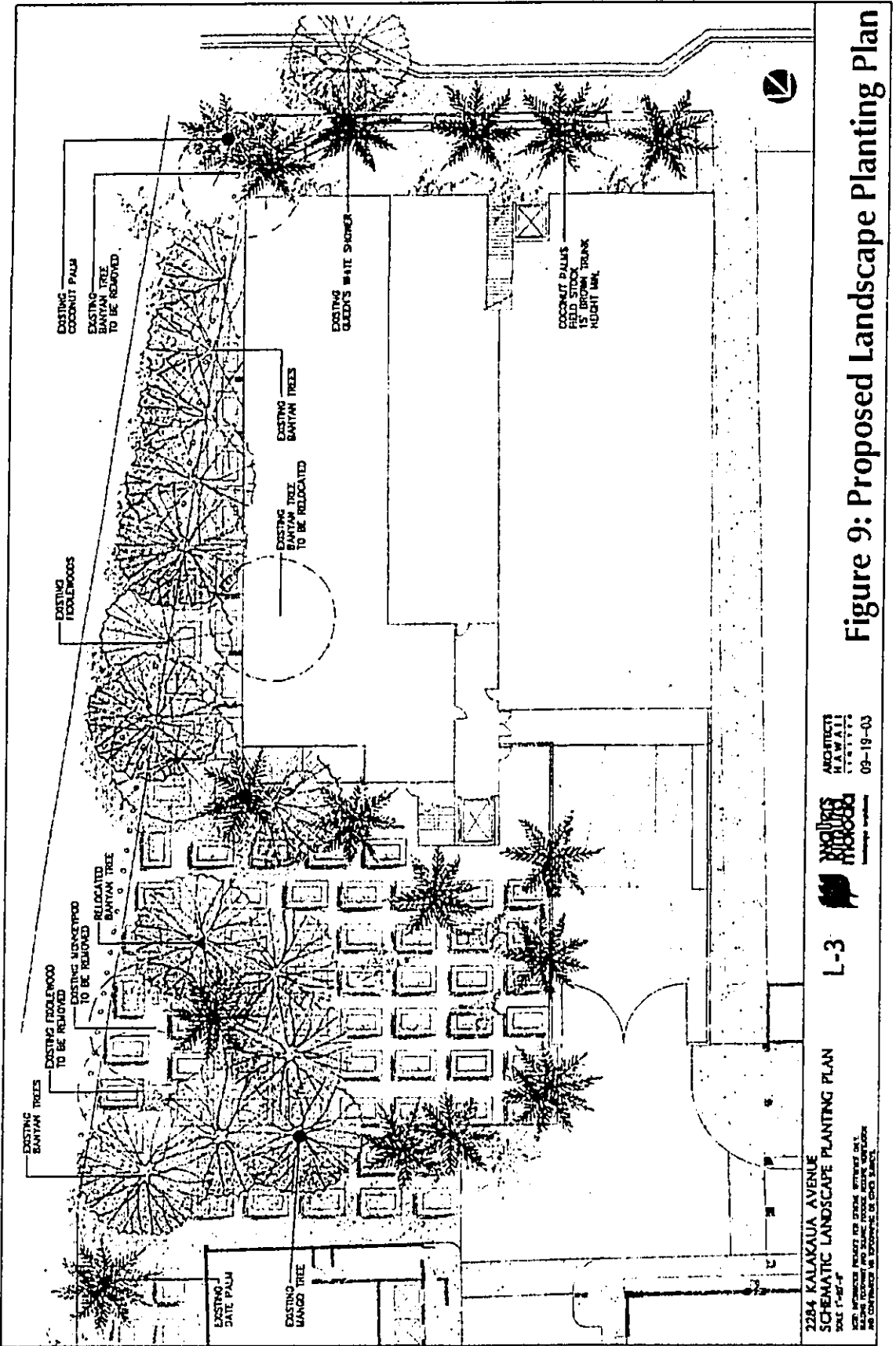
<sup>1</sup> Originally named the Waikīkī Theatre, the facility was renamed in conjunction with the opening of Waikīkī Theaters #1 and #2 in 1969.

## 2.4 ENVIRONMENTAL CHARACTERISTICS

The subject property is a developed commercial site located in the midst of a high-density urbanized area. Existing vegetation consists of introduced species in planters and the subject property does not contain unique or endangered species of plants. Mature trees found on the site include the Coconut Palm, Date Palm, MacArthur Palm, Banyan, Fiddlewood, and Mango.

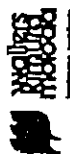
Most of the mature trees will be retained, with a few requiring relocation or removal due to construction activities (see Figure 9). A certified arborist will be contracted to assist in the relocation of the mature trees. New Coconut Palms will be planted, enhancing the project site.

The property is not a significant faunal habitat.



2284 KALAKAUA AVENUE  
 SCHEMATIC LANDSCAPE PLANTING PLAN  
 SCALE 1"=40'-0"  
 SEE INSTRUCTIONS FOR OTHER SHEETS OF SET.  
 ALL DIMENSIONS AND SPACING TO BE VERIFIED BY THE CONTRACTOR AT THE TIME OF CONSTRUCTION.

L-3



ARCHITECTS  
 HAWAII  
 09-19-03

Figure 9: Proposed Landscape Planting Plan

### **3. DESCRIPTION OF THE AFFECTED ENVIRONMENT, IMPACTS, AND MITIGATION**

---

#### **3.1 CLIMATE**

The climate of the area is characterized as sunny with northeast tradewinds and occasional Kona winds. The temperature and humidity are moderate, with temperature ranging from the high 60s to the mid 80s in degrees Fahrenheit. Precipitation is light, averaging 20 inches per year. The proposed project would have no effect on climatic conditions.

#### **3.2 TOPOGRAPHY AND SOILS**

The subject property is flat with an elevation of approximately 5 feet above mean sea level (MSL). Construction of the proposed project will involve minor filling of the site so that the ground floor will be situated above the base flood elevation of 6 feet MSL.

Soils within the project area are classified by the U.S Department of Agriculture (USDA) Soil Conservation Service as Jaucas sand, 0 to 15 percent slopes (JaC). Jaucas soils are excessively drained, calcareous soils that developed in wind- and water-deposited sand from coral and seashells. Jaucas sand (JaC) is characterized by rapid permeability and slow to very slow runoff. The hazard of water erosion is slight, but wind erosion is a severe hazard where vegetation has been removed. According to the *Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii*<sup>2</sup>, JaC soils are suited for pasture, sugarcane, truck crops, and urban development.

#### **3.3 SURFACE HYDROLOGY AND DRAINAGE**

Rainfall in the Waikiki Beach area is generally absorbed by the porous coral substrate, except areas having a large amount of impervious surfaces. The general drainage pattern on the subject property is toward Kalākaua Avenue around the perimeters of the existing building. Drainage collected from the Waikiki Theater 3 building is transmitted through a direct connection to the municipal storm sewer system.

Grading and drainage plans are currently being prepared. Grading will be limited to minor excavation of footings to approximately 24-inches in depth, and fill with compacted materials to elevate the slab above the base flood elevation. Surface and roof run-off will be collected and routed directly to the City's storm drain system.

#### **3.4 FLOOD HAZARD**

The project site is within Zone AE according to the Flood Insurance Rate Map (FIRM). A

---

<sup>2</sup> Soil Conservation Service, U.S. Department of Agriculture, in cooperation with The University of Hawai'i Agricultural Experiment Station, *Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii*, Washington D.C., August 1972

rating of AE designates flood hazard areas that have a one percent risk of inundation in any given year. According to the FIRM, the base flood elevation at the site is six feet above Mean Sea Level (MSL). The finished floor elevation of the proposed building will be greater than +6 MSL.

According to the Hawai'i Civil Defense System's Tsunami Evacuation Map, the site lies outside of the evacuation area. The project is not expected to exacerbate flood hazards.

### **3.5 FLORA AND FAUNA**

The project site does not contain any threatened or endangered species and thus does not require mitigative measures. As described in Section 2.4, most of the existing mature trees will be retained on site, with a few requiring relocation or removal (see Appendix B). The three trees scheduled for removal include a fiddlewood at the rear of the parcel (8-inch caliper); a dead monkeypod stump; and a large banyan that may encroach on Duke's Lane near Kalākaua (24-inch caliper). The banyan lies within the building site and cannot feasibly be relocated. The one tree proposed for relocation is another large banyan (24-inch caliper) located within the building site. A certified arborist will be consulted prior to relocation.

### **3.6 HISTORIC AND ARCHAEOLOGICAL RESOURCES**

As described in Section 2.3 and Appendix C, there are no on-going traditional cultural practices in the vicinity of the subject property, but it is likely that significant historic properties including traditional Hawaiian cultural deposits, historic trash deposits, and human burials, exist underground on the subject property. Once the existing building is demolished and before any construction work begins, a contracted archaeological consultant, Cultural Surveys Hawai'i, Inc., will consult with the State Historic Preservation Division and conduct an archaeological inventory survey. Should historically significant remains be found, a mitigation plan based on the remains will be developed.

The "Waikīkī Special District Design Guidelines" document includes Waikīkī Theater 3 in its listing of "Historic Structures." In 1979, however, the Hawaii Historic Places Review Board decided not to list the property on the state's historic register. In early 2003, the State Historic Preservation Division inspected the theater and recommended that certain items be salvaged or photographed prior to the theater's demolition. Demolition began in March 2003 and is continuing in phases. Photographic documentation and salvage have been completed, with the exception of the decorative grills on the exterior of the building. The Hawai'i Theatre salvaged the pipe organ parts and is warehousing them for future repairs.

### **3.7 NOISE**

Construction activity would generate short-term noise impacts from the use of heavy machinery in excavation and construction. Over the long term, it is anticipated that a slight increase in noise along the streets may result from delivery truck activity. However,



since the previous uses involved delivery truck activity as well, it is not anticipated that the net result will be significant. Delivery trucks would be limited in size to 30 feet in length.

### **3.8 AIR QUALITY**

Ambient concentrations of air pollution are regulated under both federal and State ambient air quality standards (AAQS). The State Department of Health (DOH) operates air quality monitoring stations at Barbers Point, Pearl City, Downtown Honolulu and Sand Island.

The 2001 *Annual Summary Hawai'i Air Quality Data*, which is the latest publicly available annual report, shows that State AAQS are currently being met, with one minor exception: PM<sub>10</sub> (particulate matter 10 microns or less) pollution standards were exceeded at the Pearl City site once in 354 valid measurement periods during the year. In 2001, no sites exceeded the less strict Federal AAQS.

Air quality impacts attributed to project development would include exhaust emissions of construction vehicles and dust generated by short-term construction-related activities. Site work such as clearing and grading would generate particulate matter. Dust control measures, such as use of dust curtains and regular watering and sprinkling, would be implemented to minimize wind-blown emissions during construction. All construction activities would comply with the provisions of Chapter 11-60.1, Hawai'i Administrative Rules, Section 11-60.1-33 on Fugitive Dust.

### **3.9 WATER QUALITY**

The proposed demolition and construction of the new building are expected to have no impact on ocean waters or existing water quality. Because shallow footings will be used, no de-watering activities are anticipated.

Short term impacts during the construction period will be mitigated using best management practices for erosion control. These include, but are not limited to, installing silt fences, providing gravel entrances for trucks and heavy equipment, and providing sediment basins. The project will comply with the City's Rules Relating to Soil Erosion Standards and Guidelines.

### **3.10 VISUAL RESOURCES**

The project site is located in the middle of a highly urbanized area. The proposed structure would not exceed the height of surrounding buildings and thus would not block views toward the mountain ridges or the ocean (see Figure 10).

### **3.11 SOCIAL AND ECONOMIC CONDITIONS**

#### **Employment**

The closure of the three Waikiki Theaters was announced in November of 2002. Theater

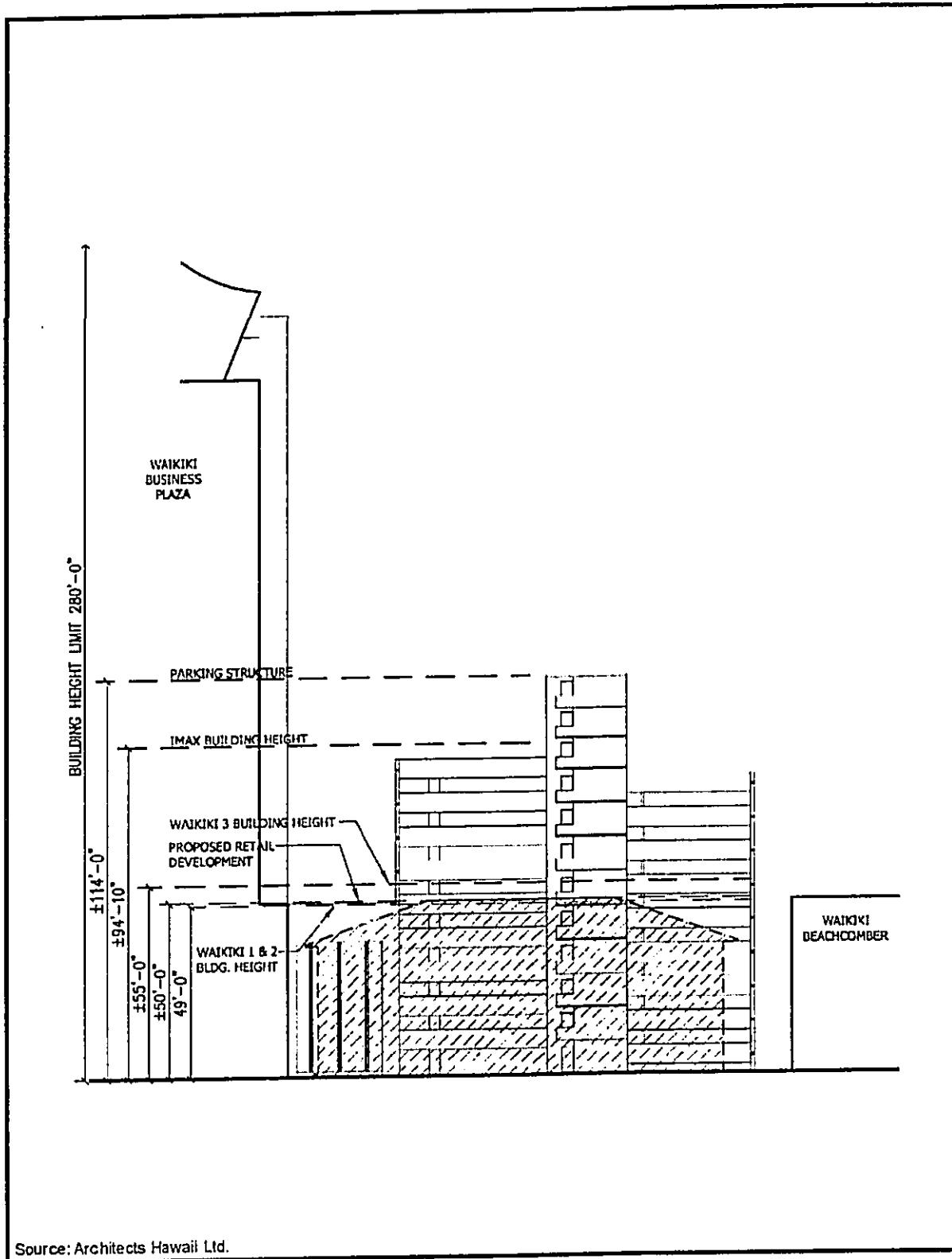


Figure 10: Building Height Analysis

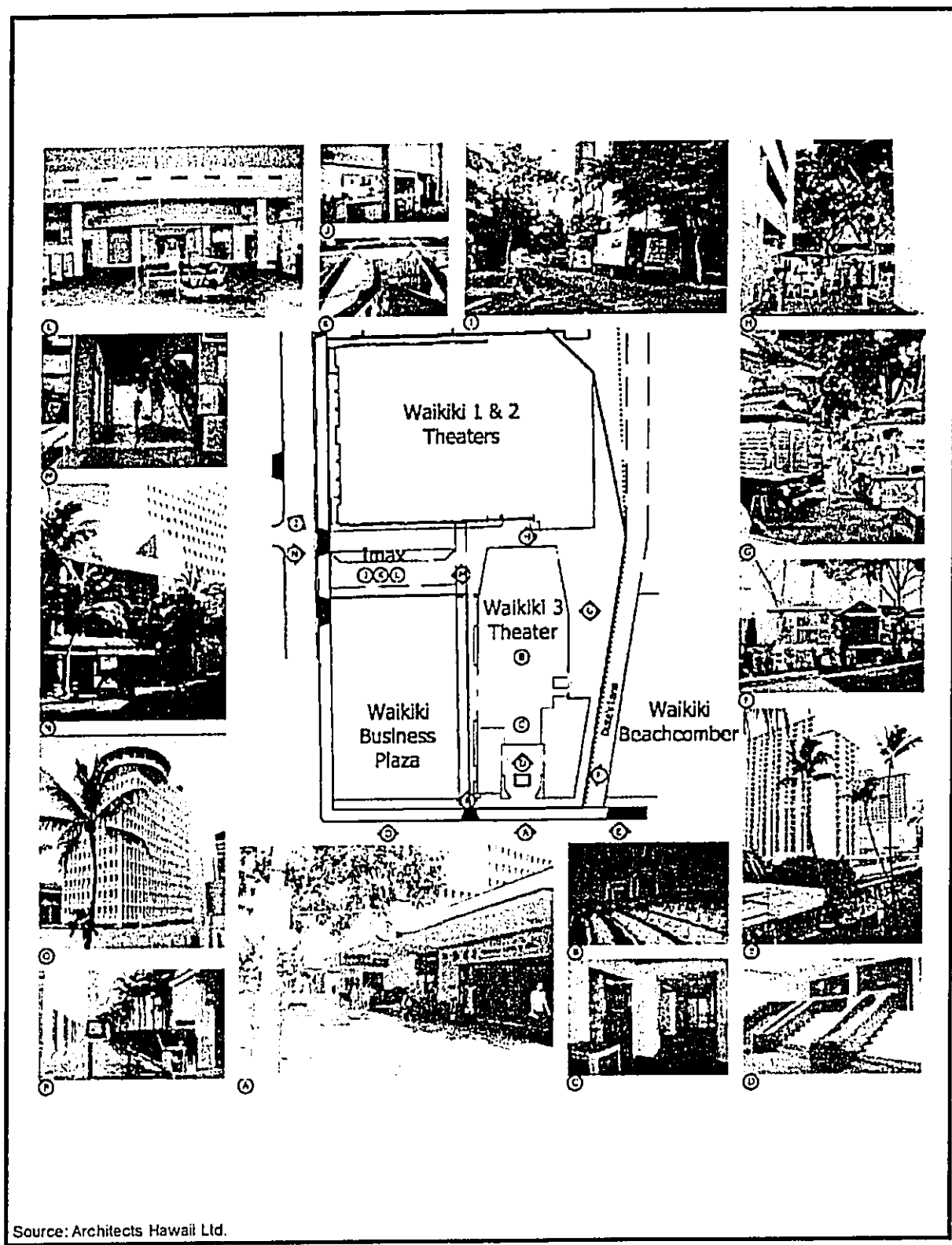


Figure 11: Visual Analysis

employees were absorbed into other operations run by Consolidated Theaters. The construction of the proposed project would create employment in both the short and long term.

In the short term, construction jobs would be created for demolition and new construction. Once completed, the new retail building and its new tenants would provide jobs for approximately 260 full-time employees. Another 40 additional jobs in retail also could be created in the former Waikī Theater 1 & 2 building, depending upon the future tenant(s).

Outside the building, at least three and up to 15 of the existing kiosk vendors will be temporarily displaced during construction. In the long term, the number of kiosks is anticipated to increase by approximately 32 to a total of 79.

#### **Government Finances**

The proposed development would yield additional tax revenues to both the State and the City. The State would collect excise taxes and income taxes from business and employment, both in the construction phase and during long term operations. The City would collect property tax revenues over the long term.

#### **Population**

Development of the project would have a negligible impact on population growth.

### **3.12 ROADS AND TRAFFIC**

Existing vehicular access to the subject property is from Seaside Avenue, a two-lane street serving one-way traffic in the mauka-bound direction from Kalākaua Avenue toward Kūhiō Avenue and Ala Wai Boulevard. A study done in August 1995 found that the portion of Seaside Avenue fronting the access to the subject property carried 6,400 vehicles per day (440 vehicles per hour during the weekday afternoon peak hour)<sup>3</sup>.

From Seaside Avenue, a single driveway runs along the makai side of the Waikī Theaters 1 & 2 building. This driveway leads to a 10-story parking structure at the rear of the Waikī Theaters building. No change is proposed to the existing driveway and thus, no significant impacts to traffic circulation patterns are anticipated.

In order to determine the potential traffic impact of the proposed use, comparisons were made between the proposed use and the former use of the property, which included three theaters with a total seating capacity of about 3,000 persons. Estimates of the peak hourly traffic generated by the former and proposed uses are detailed in Appendix E and summarized below.

Many of the theater patrons arrived from outside Waikī by car or bus. Estimated peak hourly volumes due to the theater use are 115 vehicles per hour entering and 105 vehicles

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<sup>3</sup> Source: City and County of Honolulu, Department of Transportation Services

per hour departing the site during a weekday. Saturday evening volumes are estimated to be higher, with 195 vehicles per hour entering and 165 vehicles per hour departing the area.

The proposed retail and restaurant uses are expected to serve primarily tourists already in Waikīkī, who would access the site as pedestrians. Vehicular traffic due to the proposed use would be generated by other customers, employees, and vendors. Vehicular traffic estimates are 85 vehicles per hour entering and 65 vehicles per hour departing the site during the weekday peak hour; and 95 vehicles per hour entering and 65 vehicles per hour departing the site during the Saturday peak hour. The proposed use would generate less traffic than the former use.

The increased loading and unloading activity to support the proposed use will be accommodated by a new off-street loading bay that backs to the edge of the proposed new building. It is proposed that delivery trucks, limited to 30 feet in length, enter and exit via Seaside Avenue. To coordinate future loading activities with the parking, the owner will develop and utilize a Parking and Loading Management Plan. Kiosk vendors located on the diamond head side of the property will continue to use Duke's Lane for loading. In addition, there is a loading bay on Kalākaua Avenue in front of the property.

Because the new building needs to be elevated to meet flood hazard requirements, the design calls for stepping up to a podium (landing) about 18 inches above the sidewalk. This grade change, coupled with the loading bay that cuts into the sidewalk in front of the property would reduce the area within the owner's property that is currently available for pedestrian traffic. In preparing the Waikīkī Special District Permit application, the owner will give consideration to replacing the podium with a gradual ramping-up of the sidewalk. With the proposed loading facilities at the rear of the new building, consideration should also be given to eliminating the loading bay and replacing it with increased pedestrian travel-way or landscaping.

The proposed project will generate less vehicular traffic than the former use of the site. Parking requirements are also expected to be less with the proposed use (see Appendix E). The proposed project supports the City's Waikīkī Livable Community project by improving pedestrian linkages through the area. In addition, unused parking will be made available for other Waikīkī visitors.

### **3.13 PUBLIC UTILITIES**

#### **Water Supply**

The project site is served by the Board of Water Supply via a lateral connection from Seaside Avenue. The Board of Water Supply anticipates that the existing water system is adequate to accommodate the proposed development.

#### **Wastewater Disposal**

The existing connection to a 10-inch sewer line that runs to Seaside Avenue would be utilized for the proposed project. It is anticipated that the proposed uses would be

adequately served by this existing connection. No mitigation measures are planned.

#### **Drainage**

Since the proposed project will have more open space and less roof area, there may be a slight decrease in stormwater run-off. Design of improvements and connection into the City's storm drain system will comply with the City's "Rules Relating to Storm Drainage Standards." A new Drain Connection License may be required.

#### **Electrical Power & Telecommunications**

Existing connections for electricity and telecommunications should be adequate to serve the proposed project. No mitigation is necessary.

### **3.14 OTHER PUBLIC FACILITIES AND SERVICES**

Development of the project would not create a significant need for additional public facilities and services. It should be noted, however, that the Honolulu Police Department anticipates that construction-related noise, dust, and traffic will generate calls for police service.

### **3.15 SUMMARY OF ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED**

The proposed project will result in unavoidable, though minor, construction-related impacts as described earlier in this section. Examples are temporary air quality impacts associated with dust generated from construction activities and exhaust emissions discharged by construction equipment. The proposed project is not anticipated to create any significant, long-term adverse environmental effects.

### **3.16 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES**

Major resource commitments include financial, labor, and energy outputs required for the project's completion. Also, once committed to the proposed uses, the land would be unavailable for other potential uses.

## **4. ALTERNATIVES TO THE PROPOSED ACTION**

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### **Conversion of Existing Building to Retail Use**

For a number of reasons, the Waikīkī Theater 3 building is not suited to renovation for retail use. The configuration of the building is long and narrow, taking up the entire lot (see Figure 3). It is poorly proportioned for retail – almost three times as deep from the street as it is wide. Deep spaces cannot be easily configured to serve multiple retail or restaurant uses, each of which desires street frontage. The Waikīkī Theater 3 building is not large enough for conversion to an interior mall.

Commercial street-front space along Kalākaua Avenue is valued and leased at very high rates. Asking rent for the proposed new building at the Waikīkī Theater 3 site is on the order of \$15 per square foot. Property taxes are equally high. Potential tenants demand a visible presence and good access from the sidewalk. The front entry to the Waikīkī Theater 3 building is set on a raised platform far back from the sidewalk. To make viable commercial space, a new street-front structure would have to be built with a new façade. Linking the new street-front structure to the existing theater building would entail changes to the foundation as well as many other modifications. This alternative would cost at least as much to construct, if not more, than the proposed project.

The building that formerly housed Waikīkī Theaters 1 and 2 is better configured for reuse for other commercial purposes. The building is broader along the street-front than it is deep, providing more street frontage in proportion to total area. The uncomplicated basic structure of the building makes renovation more feasible. Because rents in this location are lower (about \$3 per square foot), potential tenants include high-volume space users such as a discount clothing store.

Given the high value of the Kalākaua frontage and the market for high-value commercial tenants, the owner determined that it would not be feasible to reuse the old theater building and that the property can be more efficiently utilized, at a better economic return, by redevelopment in the manner proposed.

The proposed new retail building will have the advantages of a good street presence, good pedestrian access from the sidewalk, convenient loading facilities at the rear, and an open courtyard. The courtyard space can be leased for vendor kiosks. There is a strong demand for kiosk space from the many vendors who will be displaced by redevelopment of the International Marketplace.

### **Theater Re-Use or Live Entertainment Venue**

The subject property has a long history of being an established movie theater location. Changing habits and expectations of movie-goers, increasing numbers of multiplex theaters in residential areas, and changing technology have resulted in declining attendance at the Waikīkī Theaters. Re-using the theater for movies or live performances is not feasible for reasons mentioned above, but also because of competition from the Ward Entertainment theater complexes, Dole Cannery theaters, and from live

entertainment available in Waikīkī hotel showrooms and restaurants. Retro-fitting the existing building envelope to create a multi-screen theater complex or live performance venue also would be difficult and very expensive to accomplish.

### **Single-story Retail**

This alternative, without the second and third stories, does not utilize the subject property to its fullest extent and is not desirable at this point. However, if it is found that businesses are not interested in leasing space on the second and third floors, then this alternative may become the logical choice.

### **No Action**

The No Action Alternative would leave much of the subject property vacant and underutilized. While it would be possible to increase the number of kiosk vendors under this alternative, a well-designed permanent structure would better serve the objective of making this central location in Waikīkī more attractive and economically productive.

## **5. LIST OF APPROVALS AND PERMITS REQUIRED**

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During the implementation stages of the project, the applicant would be working with the Federal, State and County review agencies for examination and approval of project plans and specifications.

<b>Permit</b>	<b>Responsible Agency</b>
Waikīkī Special District	Dept. of Planning & Permitting
Demolition Permit (for remaining two retail buildings)	Dept. of Planning & Permitting
Grading Permit, Building Permit	Dept. of Planning & Permitting
Drain Connection License, Sewer Connection	Dept. of Planning & Permitting



## 6. ASSESSMENT OF PROPOSED PROJECT IN RELATION TO CHAPTER 343 SIGNIFICANCE CRITERIA AND ANTICIPATED DETERMINATION

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According to the Department of Health Rules (11-200-12), an applicant or agency must determine whether an action may have a significant impact on the environment, including all phases of the project, its expected consequences both primary and secondary, its cumulative impact with other projects, and its short and long-term effects. In making the determination, the Rules establish "Significance Criteria" to be used as a basis for identifying whether significant environmental impact would result from the development. According to the Rules, an action shall be determined to have a significant impact on the environment if it meets any one of the following criteria:

**1. *Involves an irrevocable commitment to loss or destruction of any natural or cultural resource.***

As summarized in Section 2 and detailed in Appendix C, the subsurface area of subject property may contain objects of historic significance. A full archaeological inventory will be conducted in consultation with the State Historic Preservation Division prior to construction of the new building. Should historic remains be discovered, a mitigation and/or preservation plan will be developed to avoid unnecessary loss or destruction of any valuable natural or cultural resource.

The subject property is located in a highly urbanized area and does not contain notable floral or faunal habitats. It also is a site that is mostly paved and not a natural area where native Hawaiian gathering rights can be exercised.

**2. *Curtails the range of beneficial uses of the environment.***

The subject property and its surroundings are already committed to resort and commercial uses. The proposed project is consistent with State and County land use controls and is thus within the range of possible beneficial uses.

**3. *Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS; and any revisions thereof and amendments thereto, court decisions, or executive orders.***

The proposed development is consistent with the Environmental Policies established in Chapter 344, HRS. The new structure will not affect the State's natural resources nor lower the total quality of life for Hawai'i residents.

**4. *Substantially affects the economic or social welfare of the community or state.***

The proposed uses would create jobs and constitute an economic benefit to the Waikiki region and the State; however, the effect would not be substantial.

**5. *Substantially affects public health.***

The proposed uses would have no detrimental effect on public health. Short-term impacts due to construction would be controlled as described previously.

**6. *Involves substantial secondary impacts, such as population changes or effects on public facilities.***

The proposed project would increase jobs and economic activity in Waikīkī, which may result in secondary impacts such as residential migration or in increased demand for public transportation; however, because of the relative scale of this project, secondary impacts would be negligible.

**7. *Involves a substantial degradation of environmental quality.***

Because the subject property was previously built upon, it is not anticipated that the replacing building or paving would degrade environmental quality to a measurable extent.

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

The project is limited to the proposed uses and involves no larger actions or further cumulative effects.

**9. *Substantially affects a rare, threatened or endangered species or its habitat.***

There are no rare, threatened, or endangered plant or animal species located on the subject property.

**10. *Detrimentially affects air or water quality or ambient noise levels.***

The proposed uses would not have a significant detrimental effect on air or water quality.

**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, freshwater, or coastal waters.***

The subject property is located within a flood hazard area with a base flood elevation of six feet. The architectural design of the proposed new building is such that the finish floor elevation is above six feet MSL. It is not anticipated that the proposed project would affect flooding or suffer damage by its location within the flood plain.

The subject property is not located in the tsunami evacuation area, on a beach, in an erosion-prone or geologically hazardous area, in an estuary, or in fresh or coastal waters.

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

The visual impact of the project would not be significant, especially considered in relation to surrounding buildings and uses. The proposed three-story structure is shorter than adjacent surrounding buildings (see Figure 10).

**13. Requires substantial energy consumption.**

None of the proposed uses incurs a high level of energy consumption.

Based on the findings of this Environmental Assessment, it is expected that the proposed project would not have a significant environmental impact and an Environmental Impact Statement (EIS) would not be required. Therefore, a Finding of No Significant Impact (FONSI) is anticipated.

## 7. REFERENCES

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United States Department of Agriculture, Soil Conservation Service, *Islands of Kaua'i, O'ahu, Maui, Moloka'i, and Lana'i, State of Hawaii*, 1972.

## APPENDICES

APPENDIX A  
Draft EA Comment and Response Letters

**BOARD OF WATER SUPPLY**

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843



2003 NOV 18 PM 4 21

November 18, 2003

CITY AND COUNTY OF HONOLULU

JEREMY HARRIS, Mayor  
Eddie Flores, Jr., Chairman  
Charles A. Steed, Vice-Chairman  
JAMES L. AMB  
HERBERT E.K. KAOPUA, SA  
DARLENE K. LEONARD

ROBERTY K. HARAGA, E-0500  
LARRY A. LEOPARDO, E-0500  
CLIFFORD S. JAMILE  
Manager and Chief Engineer  
DOMINA FAY K. FROSTGARD  
Deputy Manager and Chief Engineer

**DEPARTMENT OF FACILITY MAINTENANCE**

**CITY AND COUNTY OF HONOLULU**

1000 JUJUHUA STREET, SUITE 215, KAPOLEI, HAWAII 96707  
2003 NOV 18 PM 3 59



JEREMY HARRIS  
Mayor  
CITY AND COUNTY OF HONOLULU

LARRY J. LEOPARDO, P.E.  
DIRECTOR AND CHIEF ENGINEER  
ALVIN LU  
DEPUTY DIRECTOR  
MINUTE LETTER TO:  
ORA 03-870

November 4, 2003

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

FROM: *Clifford S. Jamile*  
for CLIFFORD S. JAMILE, MANAGER AND CHIEF ENGINEER

SUBJECT: YOUR MEMORANDUM OF OCTOBER 27, 2003 ON THE DRAFT ENVIRONMENTAL ASSESSMENT, WAIKIKI SPECIAL DISTRICT PERMIT FOR WAIKIKI KALAKAUA RETAIL, INK: 2-6-22-9, J4 AND 24

**MEMORANDUM**

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

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

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT  
ROBERTSON PROPERTIES GROUP

The existing water system is presently adequate to accommodate the proposed commercial building.

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.

If you have any questions, please contact Joseph Kaakua at 748-5442.

Thank you for the opportunity to comment on the Draft Environmental Assessment.

We have no comments at this time but would like to be kept informed as the project progresses.

If I can be of any assistance, please do not hesitate to contact me at 523-4472.

DEPARTMENT OF PARKS AND RECREATION  
**CITY AND COUNTY OF HONOLULU**

1000 ULUOHA STREET, SUITE 300 • KAPOLOA, HAWAII 96707  
 PHONE: (808) 692-5501 • FAX: 692-5131 • INTERNET: www.ci.honolulu.hi.us



WILLIAM D. BALFOUR, JR.  
 DIRECTOR  
 EDWARD T. "BUFFA" DIAZ  
 DEPUTY DIRECTOR

JEREMY HARRIS  
 SENIOR

November 7, 2003

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

FROM: WILLIAM D. BALFOUR, JR., DIRECTOR

SUBJECT: CHAPTER 343, DRAFT ENVIRONMENTAL ASSESSMENT  
 WAIKIKI SPECIAL DISTRICT PERMIT (MAJOR)  
 ROBERTSON PROPERTIES GROUP  
 TMK 2-6-22: 9, 12 & 24  
 2003/ED-23(GU)

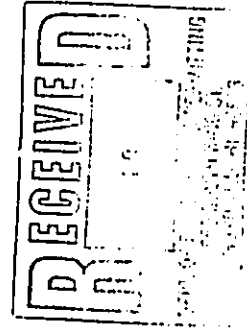
Thank you for the opportunity to review and comment on the Draft Environmental Assessment relating to the proposed improvements by Robertson Properties Group on the site of the former Waikiki Theaters and IMAX.

The Department of Parks and Recreation has no comment on the project.

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

*William D. Balfour, Jr.*  
 WILLIAM D. BALFOUR, JR.  
 Director

WDB:cu  
 (11/13)



DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

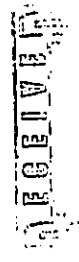
410 SOUTH KING STREET • HONOLULU, HAWAII 96813  
 TELEPHONE: (808) 521-4414 • FAX: (808) 527-8743 • INTERNET: www.ci.honolulu.hi.us



ERIC G. CRISPIN, AIA  
 DIRECTOR  
 BARBARA KING STANTON  
 DEPUTY DIRECTOR

2003/ED-23(GU)

December 5, 2003



DEC 8

Ms. Lisa Imata  
 PlanPacific, Inc.  
 345 Queen Street, Suite 802  
 Honolulu, Hawaii 96813

Dear Ms. Imata:

Draft Environmental Assessment (DEA) - Waikiki Kalakaua Retail Project  
 — 2284 Kalakaua Avenue, Tax Map Key: 2-6-22: 9, 14, 24, Waikiki

Transmitted for your information and appropriate action are comments from several State and City agencies regarding the subject draft environmental assessment. These agencies are:

State: State Historic Preservation Division of the DLNR, Department of Health (Clean Water Branch; Environmental Management Division; and Wastewater Branch), Office of Hawaiian Affairs, Department of Transportation and the Office of Environmental Quality Control.

City: Fire Department, Department of Facility Maintenance, Department of Parks and Recreation, Board of Water Supply and the Honolulu Police Department.

Any comments received after this transmittal will be forwarded immediately.

In addition, enclosed herein are the Department of Planning and Permitting's comments on the DEA from our Land Use Permits, Site Development and Planning Divisions. Should you have any questions, pertinent contact names and numbers have been provided.

- I. Land Use Permits Division (LUPD)
  - A. Page 1 - States that the landowner/applicant is the Robertson Property Group. The DPP's data base indicates a different fee owner. It would therefore be helpful for the EA to clarify the timing of title transfer.



- B. Page 3 - States that the three properties "are linked together under a joint development agreement...". The Final Environmental Assessment (FEA) should include the DPP file number for this joint development agreement, 89/CUP1-64.
- C. Page 3 - States "a narrow easement, approximately 10 feet wide, runs along a portion of the northwestern boundary...".
- The FEA should explain the purpose of this easement, as well as the entities involved as grantor and grantee. The same information should be provided for all easements on the subject parcels.
- D. Pages 3, 7, and 21 - Page 3 states that the parking structure on Parcel 24 is "shared by all three properties". Page 7 states that "the building that formerly housed Waikiki Theaters 1 and 2 is undergoing interior renovations in order to accommodate new retail uses". There is further mention that the suspended IMAX operation may or may not resume, and that the space may also be renovated for possible retail use. Page 21 states "...unused parking could be made available for other Waikiki visitors".
- The DPP shares the concerns of the City's Department of Transportation Services (DTS) expressed in its letter to you of August 29, 2003. Those concerns pertain to project impacts on driveway access, loading activities/operations, pedestrian activity, adjacent land uses/activities; and the overall need to articulate and coordinate the shared use of facilities (i.e., parking structure, loading facilities) among future uses on the project site. This becomes even more critical if parking is made available to off-site users.
- These concerns should be more fully addressed in the FEA, including, but not limited to, the feasibility of developing and utilizing a Parking and Loading Management Plan to coordinate future uses on the properties.
- E. Page 7 - States that the DPP "granted a permit in March 2003" to demolish the Waikiki Theater 3 building. As a minor point of clarification, the FEA should add that prior to the demolition permit, the DPP granted a minor special district permit for the building's demolition (2003/SDD-1) in February 2003. The DPP did so only after the owners and their agents stated there were no future plans for development of the site.

- F. Page 7 - States that "there are currently 47 vendors operating from kiosks on the subject property...and after redevelopment, the increased amount of open space will allow a maximum total of 79 kiosks."
- The FEA should provide information about the kiosks, including their size, whether they will be required to adhere to a uniform design, whether they will require and be provided with electrical hook-ups, and whether they will be fixed or portable. Further, hours of operation should be included, as well as potential impacts on traffic (vehicular, pedestrian) and lighting.
- G. Page 7 - States "when plans are finalized, it is possible that the size of the structure could be reduced to one or two stories".
- While the FEA must address the impacts of a potential three-story structure, please be advised that the future Special District (Major) permit application will need to reflect the final design of the building.
- Further, the FEA should address the impacts of each of these three possible development scenarios for the site - one, two and three-story building - including traffic, parking and loading, views, social and economic conditions (i.e., full-time employees), and public utilities (water, wastewater, electrical). In addition, the FEA should provide an estimated Gallons Per Day (gpd) figure for water usage and wastewater disposal for each development option, as well as the cost and development time-frame for each.
- H. Page 19 - States "the proposed structure would not exceed the height of surrounding buildings and thus not block views toward the mountain ridges or the ocean".
- The addition of a view analysis to the FEA would be useful to illustrate and support this statement. Additionally, the FEA should state what the maximum height limit is for the site and the surrounding properties. For comparative purposes, the FEA should also provide the height of the demolished Waikiki Theater 3 building and the two buildings remaining on the site, as well as the buildings immediately surrounding the site.
- We note that the elevation measurements on Figure 8, Proposed Elevation are not printed clearly; it would be helpful to have it corrected in the FEA.

- I. Proposed plans should include the floor area of the IMAX Theater. If that space is converted to retail use, then the information will be necessary to assess total potential required parking for the change in use.
- J. The FEA should include more discussion regarding the use of excess parking spaces in the parking garage. This should include the potential number of stalls that would be sold, used as a commercial parking facility, or used as an off-site parking facility for other properties. If partial use as a commercial parking facility is being considered, then this use and its potential impacts and mitigative measures should be discussed, including traffic impacts by the project's Traffic Consultant.
- K. Page 13 - Section 2.2 should include the number of jobs that have been lost due to the closing and proposed change in use of the existing facilities.
- L. Page 18 - Section 3.5 should add discussion about the state and health of existing trees that cannot be retained. The discussion should include the size, specie and health of the existing trees (photos to document the trees should also be provided), and how they may meet the WSD criteria for removal. In addition, the FEA should incorporate an assessment by a certified arborist in the discussion pertaining to the health of these trees and whether they can be successfully relocated.
- M. The view or "visual analysis" should include photos of the existing facilities (interior and exterior), as well as the surrounding facilities from the streets abutting the project areas.
- N. The future Special District (Major) permit application for the project should include graphic representations of each development alternative as they would appear within the existing urban environment.
- O. Section 3.4, Flood Hazard, should include information about the height of the proposed floor level compared to the existing sidewalk level. If the podium created by the raised floor level is over 30" in height, a zoning variance may be required.
- O. Section 3, which describes impacts to the affected environment, should be expanded in the FEA to address the project's impacts on the existing pedestrian environment. We note that the project's proposed podium within the required front yard along Kalakaua Avenue will reduce the area currently available for pedestrian travel. This reduction, coupled with the existing on-street loading bay

on Kalakaua Avenue, will adversely impact pedestrian movement on Kalakaua Avenue fronting the development. The FEA should provide more discussion regarding how this may be mitigated.

In preparing the future SD permit application for the project, serious consideration should be given to eliminating the podium from the project's design. Rather than creating a barrier to pedestrian movement, additional building setback should be considered to comply with flood hazard district regulations and maintain a gradual slope to the project entry.

The SD application should include photos of the pedestrian pathways within and around the project area.

- P. The current proposal does not appear to comply with the Land Use Ordinance (LUO) requirements for landscaping of required front yards. The FEA should state whether or not the project will comply. The future SD permit application will need to include specifics on project compliance.
- Q. Sections 2.3 and 3.6 Historic Resources, should acknowledge that the Waikiki Theater 3 is identified in the Waikiki Special District Design Guidelines as a structure worthy of preservation or maintained as a way of providing physical links to Waikiki's past.
- The DEA includes a single-story structure as a development alternative. We note that the existing theater is a single-story structure. In addition, the applicant is proposing to convert Theaters 1 and 2 into retail spaces, indicating that the cost of converting theaters into retail space is not apparently prohibitive. Therefore, it is reasonable for the FEA to include consideration of another development alternative - the preservation and conversion of the Waikiki Theater 3 into retail space, and the demolition of Theaters 1 and 2 to make way for a new structure.
- In addition, preservation of some of the Waikiki 3's building components should also be included in the FEA. These could include: preserving the organ intact, and donating it to an entity such as the Hawaii Theater, creating an on-site interpretative display of preserved building components, photos and historical narrative; and incorporating some of the existing motifs on the Theater's exterior into the proposed project. These ideas should be further discussed as potential mitigative measures to preserve the building and in Section 4, Alternates to the proposed action.

- R. The FEA should include a physical description and photos of the existing "kiosks". Expanded discussion should also be provided regarding how any adverse visual impacts of such structures would be mitigated, and whether the proposed project intends to revise or reconstruct the existing carts.
- S. The FEA should provide more discussion about Duke's Lane, and whether the project intends to utilize Duke's Lane for access to the project. If so, then documentation should be provided in the FEA as to the project's rights of access over and across Duke's Lane.
- T. As a reminder, per the SHPD's comments, 2003/SDD-1 (the SD minor permit granted for the demolition of the Waikiki Theater 3) required that four building elements be salvaged and either displayed or re-used at the site; and that certain photographs of the theater be provided to the SHPD.

The FEA's Appendix should include a narrative describing the disposition of the four elements, as well as the requested photographs.

Questions regarding the LUPD's comments should be addressed to Geri Ung at 527-6044.

2. **Site Development Division:**

- A. **Wastewater Branch:** The municipal sewer system has limited capacity available to accommodate the expanded use of the former Waikiki Theater 3 property (TMK: 2-6-22: 9). The applicant proposes 42,975 square feet of retail and restaurant space in a new, three-story building and an additional 32 kiosk vendors for a total of 79 vendors. The applicant is required to submit a Site Development Master Application Form. The floor area of commercial space and the seating capacities of the proposed second and third floor restaurants are required to determine sewer capacity adequacy. A Wastewater System Facility Charge based on the new water meter size may be applicable.

The renovation of the Waikiki Theaters 1 and 2 building (TMK 2-6-22: 24) to commercial space and a change in use for the IMAX property (TMK 2-6-22: 14) will also require submittal of a Site Development Division Master Application Form. Wastewater Systems Facility Charges based on the size of the new water meters may be applicable.

Questions regarding Wastewater should be addressed to Ms. Tessa Ching of the DPP's Wastewater Branch at 523-4956.

B. **Civil Engineering Branch:**

1. Figure 2 - For all easements shown, state the purpose and to whom each are in favor.
2. Section 3.3 - Revise the last sentence of the second paragraph to read "...the City's Rules Relating to Soil Erosion Standards and Guidelines".
3. Section 3.3 - Will the project require a Drain Connection License? If so, include it in Section 5.
4. Section 3.9 - Address Storm Water Quality requirements in accordance with the "Rules Relating to Storm Drainage Standards".
5. Section 3.13 - Address drainage-related impacts and issues associated with this project. A drainage report may be required at a later date.

Questions regarding drainage should be addressed to Mr. Don Fujii of the DPP's Civil Engineering Branch at 523-4373.

C. **Traffic Review Branch**

1. Upon review of the DEA, the TRB has no objections to the project. It is understood that driveway locations and grades will essentially remain the same, and that all loading activities and maneuvering of vehicles will occur on site.
2. Adequate vehicular sight distances should be provided at the driveway to pedestrians and other vehicles.
3. The applicant should confirm the extent of street improvements that will be required on Seaside Avenue as part of the development prior to obtaining a building permit.
4. Construction plans for all work within or affecting City streets should be submitted for review and comment. Traffic control plans for work during construction should also be submitted, as required.

Questions regarding the above comments should be directed to Mr. Mel Hirayama of the DPP's Traffic Review Branch at 523-4119.

3. Planning Division:

A. Policy Planning Branch

1. Page 1 of the DEA should be revised to reflect the project site's designation of "Resort Mixed Use" on the current Development Plan (DP) Land Use Map for the Primary Urban Center (PUC).
2. Retail Uses are permitted under the "Resort Mixed Use" land use designation as specified in Section 24-1.3(p) of the DP Common Provisions.
3. The proposed project is located in the Waikiki Special Area and is consistent with the Principles and Controls for Special Areas as specified in Section 24-2.2(b)(2) of the PUC DP Special Provisions.
4. The proposed project is consistent with the proposed vision, policies and guidelines of the draft PUC DP (May 2002). Sections 3.2.3 of the draft designates most of Waikiki (including the project site) as "Resort", which would permit commercial uses such as shops, restaurants and entertainment activities that support hotel and resort uses.
5. The pedestrian and open space network in the area should be maintained as a desirable feature of the redevelopment of Waikiki. The integration and coordination with the redevelopment of Waikiki. The integration and coordination with the redevelopment of the International Market Place would provide an accessible and liveable area for visitors and residents. Pedestrian access along Duke's Lane from Kalakaua Avenue should be required. Retail and outdoor cafe activities fronting Duke's Lane and the interior open space/courtyard should be considered.

Questions regarding these comments should be addressed to Mr. Tim Hata at 527-6070.

B. Community Actions Plans Branch

PUC Development Plan:

1. The proposed project should further evaluate its contribution to the physical and environmental quality of the area. The development should look at enhancing the pedestrian experience by careful design of its open spaces and improving visual and physical connections to other pedestrian paths.
2. Kalakaua Setback - It is not clear what the elevated area in front of the proposed building is to be used for. Is it inappropriate for some of the carts to be situated in that setback, as encouraged in the WSD?
3. Cart Arrangement - The proposed layout appears very dense and uninviting. The applicant should consider a wide pedestrian pathway perpendicular to Duke's Lane, connecting to the existing pedestrian paths (see attached plan). This would create a defined access way from Seaside Avenue to the new retail carts, while allowing some open space and organization to occur within the sea of carts.

Questions regarding these comments should be addressed to Ms. Bonnie Arakawa at 527-5837.

C. Development Plans and Zone Change Branch

The Final EA should discuss compliance with the General Plan, and the existing PUC DP and the proposed PUC DP which had a public hearing at the Planning Commission on October 29, 2003.

The existing PUC DP requires that there be a discussion of the following factors:

- 1) Whether the development is consistent with the land use map or with any applicable zoning provisions.
- 2) Whether the development is consistent with the general height controls set forth in the DP.
- 3) Whether the development is consistent with Population Objective C of the General Plan and its related policies.

Ms. Lisa Imata  
Page 10  
December 5, 2003

- 4) Whether consideration has been given to the expected impact of the development of the living conditions of residents of the area in light of the following social impact factors:
- a. Demographic: Whether the development will:
    - 1. increase or decrease the residential population;
    - 2. increase or decrease the visitor population;
    - 3. change the character or culture of the neighborhood.
  - b. Economic: Whether the development will affect:
    - 1. the rate and pattern of economic growth and development;
    - 2. public costs or revenues;
    - 3. the availability and diversity of jobs in the development plan area;
    - 4. the principal economic activities on Oahu.
  - c. Housing:
    - 1. the range of housing choices;
    - 2. speculation in land and housing;
    - 3. property values of existing homes;
    - 4. the provision of housing for low to moderate and gap group families.
  - d. Public Service: Whether the development will affect:
    - 1. medical facilities;
    - 2. educational facilities;
    - 3. recreational facilities;
    - 4. transportation facilities;
    - 5. police and fire protection;
    - 6. public utilities facilities.
  - e. Physical/environmental: Whether the development will affect:
    - 1. the natural environment;
    - 2. existing natural monuments, landmarks, and scenic views;
    - 3. open space;
    - 4. the physical attractiveness and qualities of the area.
- 5) Whether the place and time of which the development is proposed is consistent with the planned location and sequence for constructing public facilities within the PUC DP area.

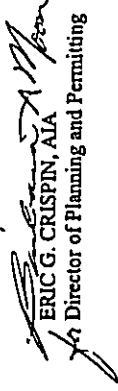
In addition, the EA should address the impact of the project on the PUC DP Special Provisions, including the principles and controls for the Waikiki Special Area.

Ms. Lisa Imata  
Page 11  
December 5, 2003

Questions regarding the Planning Division's comments should be addressed to Mr. Bob Stanfield at 527-6094.

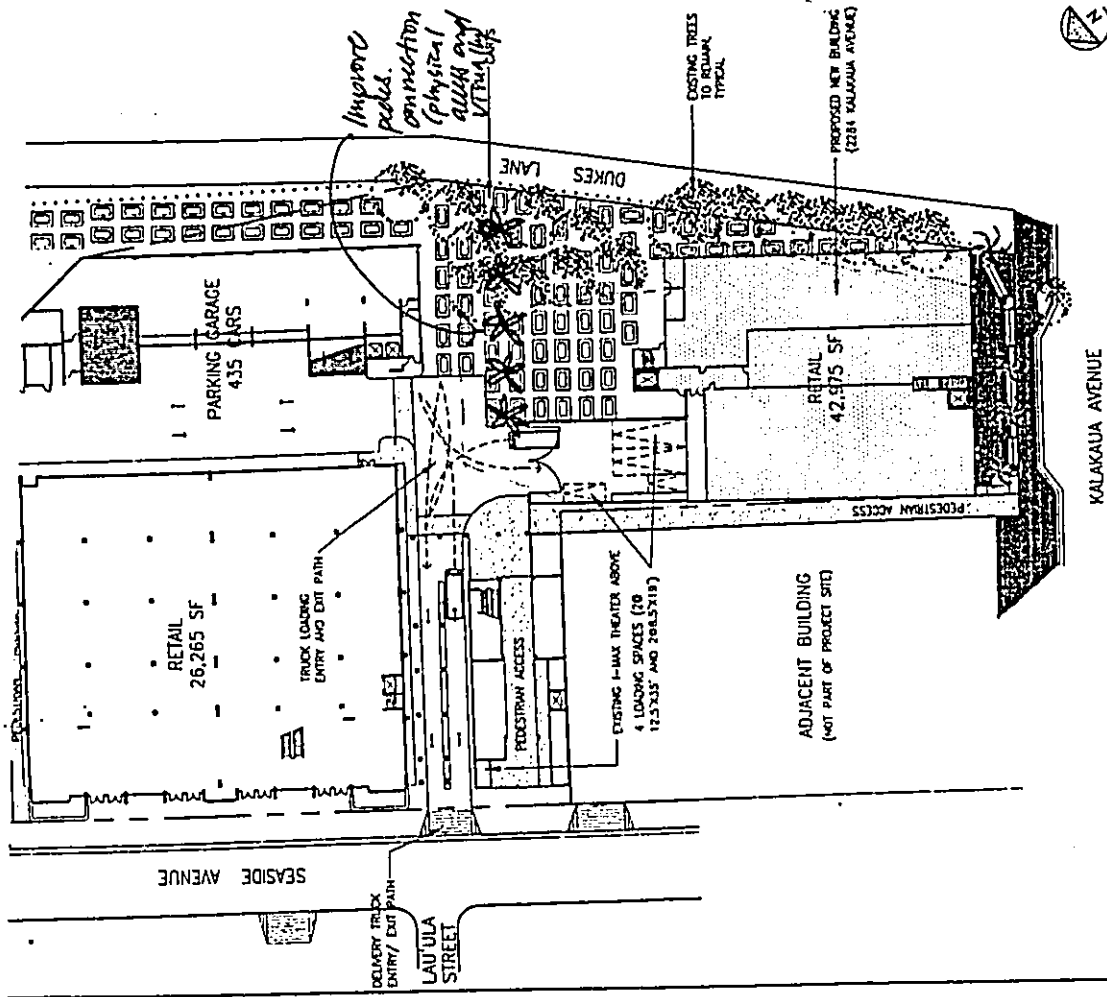
We appreciate the opportunity to provide comments on the DEA and look forward to reviewing the Final EA.

Sincerely yours,

  
ERIC G. CRISPIN, AIA  
Director of Planning and Permitting

EGC:fm  
Encl.

Posse Doc. 264263



2284 KALAKAUA AVENUE  
OVERALL SITE PLAN

SCALE 1"=65'-0"  
NOTE: INFORMATION PROVIDED FOR GENERAL REFERENCE ONLY. SITE MEASUREMENTS AND SQUARE FOOTAGE REQUIRE VERIFICATION AND CORRECTION VIA TOPOGRAPHIC OR OTHER SURVEYS.

ARCHIT  
H A W  
I I I

Figure 4: Proposed Site P

Waikiki Kalāke  
Draft Environmental AS



January 23, 2004

Mr. Eric G. Crispin, AIA, Director  
Department of Planning and Permitting  
650 South King Street, 7<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Crispin:

Subject: Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; TRK 2-6-022; 009, 014, 024

Thank you for your comment letter dated December 5, 2003. Below are itemized responses, following the numbering in your letter.

1. Land Use Permits Division
  - A. Property owner. The landowner is CP Properties, as City records correctly state. CP Properties is an affiliated company of The Robertson Properties Group (RPG). RPG controls the property and will be the applicant for the Waikiki Special District (WSD) Permit. The EA has been revised accordingly (see Sections 1 and 2.1).
  - B. Joint Development Agreement. The EA has been revised to include the DPP file number.
  - C. Pedestrian easement abutting Waikiki Business Plaza. The EA has been revised to note that the existing pedestrian pathway incorporates a 10-foot-wide easement granted over the Waikiki Business Plaza parcel in favor of the subject property (see Section 2.1, Description of the Property).
  - D. Concerns re parking and loading. The existing parking structure has been used continuously to provide individual paid parking for patrons of the property as well as other people frequenting Waikiki. If anything, the redevelopment of the theaters for other commercial uses will attract a greater percentage of patrons who arrive on foot, rather than by automobile. This will leave more parking available for other Waikiki employees and visitors.

345 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813

Tel: (808) 521-9418  
Fax: (808) 521-9468

As noted by the Traffic Review Branch, the proposed project will provide new loading facilities within the site. This will bring the property into compliance with the Land Use Ordinance (LUO). To coordinate future loading activities with the parking, the owner will develop and utilize a Parking and Loading Management Plan. The EA has been changed to reflect the intent to develop the management plan (see Section 3.12).

Note that two City studies have identified potential transportation-related future uses of the Waikiki Theaters 1 & 2 building. The Bus Rapid Transit Project has identified it as a "proposed Bus Rapid Transit Terminal," where buses would load and unload passengers. The Waikiki Livable Community Project has identified it as a "passenger and Freight Loading Center." Apparently, these are only concepts at the present time.

- E. Previous Minor WSD Permit: The EA has been changed to reflect the Minor WSD permit granted for the demolition of the Waikiki Theatre 3 building (see Section 2.1, Description of the Project).
- F. Vendor kiosks: The EA has been modified to include more information on the kiosks (see FEA Section 2.1). The new kiosks will be a uniform size, and the owner will exercise control over their design and appearance. Because nearly all kiosk patronage comes from pedestrians, there will be little impact from vehicular traffic.
- G. Size of new structure: The EA is predicated on a maximum building size of three stories, in order to estimate maximum potential project impacts. With a one- or two-story building, the number of employees will be reduced, but employment will also vary according to type of commercial use. Views would not be significantly affected if the number of stories were reduced. Vehicular traffic from customers and delivery vehicles may be also reduced if a smaller building is developed. Parking and loading facilities will comply with the standards set by the LUO.
- With regard to utilities, agencies have commented that facilities are adequate to serve the proposed development. Actual utility use will vary according to both size of the building and type of use. Retail stores typically use relatively little water and electrical power and generate relatively little wastewater, while restaurants typically have greater utility needs.
- H. View analysis: In response to your suggestion, a view analysis has been added for the Final EA (see Figures 10 and 11). Figure 8 has been corrected so that the elevation measurements are readable.
- I. Floor area of the IMAX Theater building: The EA has been revised to provide floor areas for the IMAX Theater building (see Section 2.1). The ground floor spaces are currently occupied by a car rental agency and a jewelry store.
- J. Parking garage: Section 2.1 of the EA has been amended to expand discussion of the parking garage. The garage has over 300 more spaces than needed to meet requirements for commercial uses of the property. It is the owner's intent to continue

the longstanding practice of renting excess spaces to the general public. There is no change in use or impacts.

- K. Change in employment: According to Consolidated Theaters, the average work force for the three Waikiki theaters was 30 full-time-equivalent employees. Of these, three to five were full-time managers; the remaining work force consisted of 50 to 60 part-time positions. According to Consolidated Theaters, all of the former Waikiki employees were given jobs at other theaters.
- L. Existing trees: Section 3.5 of the EA has been augmented by further discussion of existing trees. Three trees, one of them a dead stump, are proposed for removal, and one tree will be relocated (see Appendix B, Conceptual Landscape Plan).
- M. View analysis: The view analysis includes photographs of existing buildings within and adjacent to the site (see new Figure 10).
- N. Building elevated above sidewalk: Section 2.1 of the EA has been revised to provide information on the building and sidewalk elevations. The building will sit on an 18-inch podium, with steps and ramps for access from the sidewalk.
- O. Kalaka'aua Avenue sidewalk: The EA has been revised to consider the potential impacts on pedestrian traffic and possible design alternatives to improve the sidewalk functionally and aesthetically (see FEA, Section 3.12, Roads and Traffic). Project architects are considering eliminating the podium in favor of a gradual ramping-up of the sidewalk within the front yard of the property. This issue will be addressed fully in the Waikiki Special District permit application.
- P. Front yard landscaping: The intent is to comply with the landscaping requirements of the LUO. Project architects are considering various options to increase the amount of landscaping. The WSD permit application will include a revised landscaping plan.
- Q. Historic resources: Sections 2.3 and 3.6 of the EA have been amended to reflect the Waikiki Theatre 3 is listed as an "historic structure" in the *Waikiki Special District Design Guidelines*. (As stated in the EA, however, in 1979 the Hawaii Historic Places Review Board decided not to list the property on the state's historic register. In the 1980s, the theater was substantially renovated; additions were made on the front of the building, and much of the original interior was changed.)
- Section 2.1 has been amended to clarify that the building was evaluated and found to be infeasible for reuse for other commercial enterprises. The owners did find it feasible to redevelop the former Waikiki Theaters 1 and 2 building. The latter is a modern building, and its location may be suited to a high-volume clothing store or similar store. The owner will consider future reuse of salvaged historic building components and an onsite interpretive display.

- R. New vendor kiosks: The owner plans to have new vendor kiosks of uniform size and to exercise control over their design and appearance. See revised Section 2.1. Photographs of the existing kiosks and illustrations of the new kiosks will be included with the WSD permit application.
- S. Duke's Lane: Kiosk vendors currently use Duke's Lane for loading of the small items sold at those venues - e.g., t-shirts, jewelry, and memorabilia. This use will continue. Major loading and unloading for the buildings will occur at the new loading zones accessed via the Seaside Avenue driveway. Duke's Lane actually lies within the abutting diamond head properties - i.e., the Waikiki Beachcomber hotel and the International Market Place - which are owned by the Queen Emma Foundation. The various segments of the 20-foot-wide thoroughfare are subject to roadway access easements in favor of properties abutting it on the east side, including the subject property. Section 3.12 of the EA has been amended.
- T. Salvaged items: Disposition and future use of the salvaged items will be provided with the WSD permit application.
2. Site Development Division
- A. Wastewater: The developer will submit an application for connecting the new building to the municipal sewer system and will pay required facility charges.
- B. Civil Engineering
- Easements: The easements shown in Figure 2 have been labeled. The sewer easement is in favor of the City. The pedestrian easement is in favor of the abutting parcels. Duke's Lane is a roadway easement that lies within the adjacent parcels belonging to the Queen Emma Foundation.
- Drainage: To address comments concerning water quality and drainage, EA Sections 3.3 (Surface Hydrology and Drainage) and 3.9 (Water Quality) have been revised. In addition, a subsection on "Drainage" has been added to EA Section 3.13.
- C. Traffic Review Branch: As stated in your letter, the driveway serving the property will remain the same, and all loading activities will occur onsite. Vehicular sight distances at the driveway will be maintained or improved, if possible. The project design team will consult with the Traffic Review Branch concerning any street improvements on Seaside Avenue. Construction plans for any work on City streets will be submitted for review, and traffic control for construction work will be submitted as required.

3. Planning Division

- A. Policy Planning Branch: Thank you for your comments that the proposed project is consistent with: (1) the existing Primary Urban Center (PUC) Development Plan, including the Principles and Controls for Special Areas; and (2) the vision, policies

and guidelines of the proposed Draft PUC Development Plan, which is currently before the City Council for adoption.

The redevelopment of the Waikiki Theater 3 site will enhance the pedestrian and open space network by reducing the building footprint and adding a landscaped courtyard space at the interior of the property. Duke's Lane will provide a link to between the courtyard and the International Market Place.

- B. Community Action Plans Branch: Thank you for the sketch showing an enhanced pedestrian connection across the property between Duke's Lane and Seaside Avenue. The project architect will evaluate ways of improving the visual and physical connections with other pedestrian paths. We do not anticipate placing any vendor kiosks in the front yard setback; the intent there is to optimize pedestrian travel-way and landscaping along Kalakaua Avenue.
- C. Development Plans and Zone Change Branch: The proposed project is consistent with the provisions of the existing and the proposed Draft PUC Development Plans, as noted by the Policy Planning Branch. It is also consistent with the zoning standards of the Resort/Commercial Precinct under the Waikiki Special District. Since the project is small in scale and entails no change in the DP or zoning, it is expected to have no significant impact on the demography and economy of Oahu, housing, and public services. The WSD permit process will address the relationship of the proposed project to the physical environment.

Once again, thank you for your comments.

Sincerely,



Lisa Leonillo Imata  
Planner



DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 3RD FLOOR, HONOLULU, HAWAII 96813  
TELEPHONE: (808) 527-4229 • FAX: (808) 527-7330 • INTERNET: [www.dts.hawaii.gov](http://www.dts.hawaii.gov)



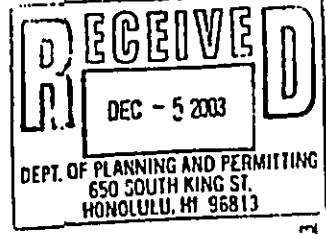
JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
DIRECTOR

GEORGE KERRY HANAWALT  
DEPUTY DIRECTOR

TP10/03-39261R

December 3, 2003



MEMORANDUM

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

ATTN: GERI LUNG

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: WAIKIKI KALAKAUA RETAIL  
NEW BUILDING ON SITE OF FORMER WAIKIKI THEATER

In response to your October 27, 2003 memorandum, we reviewed the draft environmental assessment (EA) prepared for the subject project. The following comments are the result of this review:

1. Since the Seaside Avenue driveway will serve as the access for delivery vehicles to get to/from the loading area, the driveway should be modified to accommodate turning movements with minimal impact to traffic operations on Seaside Avenue and at the driveway.
2. The loading spaces should be designed such that all are accessible. According to the proposed plan shown in the draft EA, one of the spaces could be obstructed.
3. Access to/from the parking structure should be kept clear, i.e., the maneuvering to/from the loading spaces should not obstruct vehicular access to/from the parking structure. Procedures should be developed to control access to the loading area, such that trucks waiting for a loading space do not block the access to/from the parking structure.
4. All loading/unloading needs, i.e., passenger, freight, etc., should be accommodated on-site. Since the project includes a new loading area, the necessity of the existing loading zones on Seaside Avenue should be evaluated.
5. A tour bus loading, unloading and staging area should be provided on-site.

Eric G. Crispin  
Page 2  
December 3, 2003

6. A Street Usage Permit from this department will be required for this project.

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

CHERYL D. SOON



PLANPACIFIC

January 20, 2004

Ms. Cheryl D. Soon, Director  
Department of Transportation Services  
650 South King Street  
Honolulu, HI 96813

Dear Ms. Soon:

Subject: Draft Environmental Assessment (EA) for the Proposed Waikiki  
Kalakaua Retail Project; TMIK 2-6-022; 009, 014, and 024

Thank you for your comment letter dated December 5, 2003. Below are  
itemized responses, following the numbering in your letter.

1. Seaside Avenue driveway: We recognize the need to accommodate turning movements into the driveway in order to minimize impacts to traffic operations on Seaside Avenue. Note, however, that modifications will be limited by the existing IMAX building, which has support columns within the driveway median.
2. Loading spaces: We concur that one of the four loading spaces could be obstructed, in which case it would function as a tandem space. While it might be desirable to have four individual spaces, the proposed design balances the need to retrofit a loading area on the property with the objective of creating a large, landscaped courtyard.
3. Access to the parking structure: To coordinate future loading activities with the public parking, the owner will develop and utilize a Parking and Loading Management Plan.
4. Loading zones on Seaside Avenue: We concur with the observation that loading activities should primarily occur in the new loading area. We have no objection to reevaluating the need for the existing loading zones on Seaside Avenue.
5. Tour bus loading: Because no tour bus traffic is planned or anticipated, there is no need for a tour bus loading area.
6. Street Usage Permit: The project will apply for a Street Usage Permit.

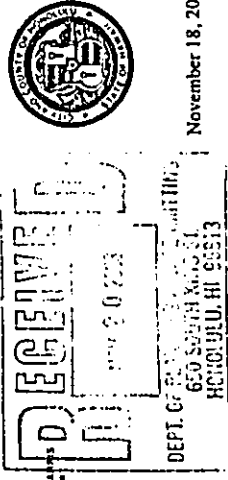
Sincerely,

*Lisa Leonillo Imata*  
Lisa Leonillo Imata  
Planner

345 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813  
Tel: (808) 521-9418  
Fax: (808) 521-9468

FIRE DEPARTMENT  
CITY AND COUNTY OF HONOLULU

3375 KONAUA STREET, SUITE 4025 • HONOLULU, HAWAII 96819-1659  
TELEPHONE (808) 511-7911 • FAX (808) 511-7950 • INTERNET: www.ci.honolulu.hi.us



ATTILIO K. LEONARDI  
FIRE CHIEF  
JOHN CLARK  
DEPUTY FIRE CHIEF

November 18, 2003

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

FROM: ATTILIO K. LEONARDI, FIRE CHIEF

SUBJECT: CHAPTER 343, DRAFT ENVIRONMENTAL ASSESSMENT  
WAIKIKI SPECIAL DISTRICT PERMIT (MAJOR)

RECORDED OWNER/  
APPLICANT: ROBERTSON PROPERTIES GROUP  
PLANPACIFIC, INC.  
AGENT: 2-6-022: 009, 012, AND 024  
TAX MAP KEYS: 2280 KALAKAUA AVENUE (PARCEL 9)  
325 SEASIDE AVENUE (PARCEL 14)  
LOCATION: SEASIDE AVENUE (PARCEL 24)  
REQUEST: WAIKIKI SPECIAL DISTRICT PERMIT (MAJOR)  
PROPOSAL: CONSTRUCT A NEW BUILDING ON  
PARCEL 9 (SITE OF THE FORMER  
WAIKIKI THEATER 3), WHICH WILL  
CONTAIN RETAIL BUSINESSES AND  
RESTAURANTS

We received your memorandum dated October 27, 2003, requesting our comments on the above-mentioned project.

The proposed project will not adversely impact services provided by the Honolulu Fire Department.

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

ATTILIO K. LEONARDI  
Fire Chief

AKLSK:hh

POLICE DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**  
801 SOUTH BERETANIA STREET  
HONOLULU, HAWAII 96813 - AREA CODE (808) 929-3111  
<http://www.honolulu.gov>

2003 NOV 24 PM 4 05

JEREMY HARRIS  
MAYOR

LEE D. DONOHUE  
CHIEF

OLEN E. KAJITAMA  
PAULO D. FUJIZUKU  
DEPUTY CHIEFS

2003 NOV 24 PM 4 01

STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. Box 3379  
HONOLULU, HAWAII 96801-3379

November 12, 2003

OUR REFERENCE CS-KP

November 20, 2003

03-1189A CAB

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

FROM: LEE D. DONOHUE, CHIEF OF POLICE  
HONOLULU POLICE DEPARTMENT

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT, WAIKIKI SPECIAL DISTRICT  
PERMIT (MAJOR), ROBERTSON PROPERTIES GROUP, 2280 KALAKAUA  
AVENUE AND 325 SEASIDE AVENUE

TO: Eric G. Crispin, AIA, Director  
Department of Planning and Permitting  
City & County of Honolulu

FROM: Thomas E. Arizumi, P.E., Chief  
Environmental Management Division

SUBJECT: Draft Environmental Assessment for Waikiki Kalakaua Retail, Honolulu.  
File: 2003ED-23 (GU)

Thank you for the opportunity to review and comment on the subject project.  
We have nothing further to add to our original comments of August 29, 2003.

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

LEE D. DONOHUE  
Chief of Police

By *Karl Godsey*  
KARL GODSEY  
Assistant Chief of Police  
Support Services Bureau

This memo is to transmit the following comments on the subject document:

Construction/Demolition Involving Asbestos:

Since the proposed project would entail renovation/demolition activities, the applicant should contact the Asbestos Abatement Office in the Noise, Radiation and Indoor Air Quality Branch at 586-5800.

Control of Fugitive Dust:

There is a significant potential for fugitive dust emissions during all phases of construction. Proposed construction activities will occur in proximity to existing residences, public areas and major thoroughfares, thereby exacerbating potential dust problems. It is recommended that a dust control management plan be developed which identifies and addresses all activities that have a potential to generate fugitive dust. Implementation of adequate dust control measures during all phases of development and construction activities is warranted.

Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust.

Mr. Eric G. Crispin  
November 12, 2003  
Page 2

The contractor should provide adequate measures to control dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:

- a) Plan the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Provide an adequate water source at the site prior to start-up of construction activities;
- c) Landscape and provide rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimize dust from shoulders and access roads;
- e) Provide adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Control dust from debris being hauled away from the project site.

If you have any questions, please contact Mr. Barry Ching of the Clean Air Branch at 586-4200.

BC:jhm



January 20, 2004

Mr. Thomas E. Arizumi, P.E., Chief  
State of Hawaii  
Department of Health, Environmental Management Division  
P.O. Box 3378  
Honolulu, HI 96801-3378

Dear Mr. Arizumi:

**Subject: Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; TMK 2-6-022: 009, 014,  
and 024**

Thank you for your comments to the above mentioned subject. Below are itemized responses, following the order in your letter:

**Construction/demolition involving asbestos:** The owner has complied with asbestos abatement requirements. From May through July of 2003, a contractor specializing in hazardous material removal performed asbestos abatement, removing interior plaster and pipes.

**Control of fugitive dust:** As stated in Section 3.8, dust control measures, such as use of dust curtains and regular watering and sprinkling, will be implemented to minimize wind-blown emissions during construction. All construction activities will comply with the provisions of Chapter 11-60.1, Hawaii Administrative Rules, Section 11-60.1-33 on Fugitive Dust.

Thank you again for the additional information and comments.

Sincerely,

*Lisa Leonillo Imata*

Lisa Leonillo Imata  
Planner

345 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813

Tel (808) 521-9418  
Fax (808) 521-9468



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 327  
HONOLULU, HAWAII 96813

CAROL L. FURUKA, M.D.  
DIRECTOR OF HEALTH

PLANNING AND PERMITTING

**RECEIVED**  
DEC - 8 2003  
DEPT. OF PLANNING AND PERMITTING  
650 SOUTH KING STREET  
HONOLULU, HI 96813

November 28, 2003

S1133LO

The Honorable 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  
Waikiki Special District (Major) Permit  
Waikiki Kalakaua Retail (TMK 2-6-002:009, 014, and 024)

Thank you for the opportunity to review and provide comments on this document. The document has been reviewed by the Solid and Hazardous Waste Programs. The Hazardous Waste Program has no comments to offer. The Solid Waste Program offers the following comments:

1. The developer shall ensure that all solid waste generated during project construction is directed to a Department of Health permitted solid waste disposal or recycling facility.
2. The OSWM recommends the development of a solid waste management plan that encompasses all project phases including demolition, construction, and occupation of the buildings. Specific examples of elements that the plan should address include:
  - recycling construction and demolition wastes, if appropriate;
  - the use of recycled content building materials; and
  - the provision of recycling facilities in the design of the project.

Please contact the Office of Solid Waste Management at (808) 586-4226 with any questions regarding these comments.

Sincerely,

STEVEN Y.K. CHANG, P.E., CHIEF  
Solid and Hazardous Waste Branch



January 20, 2004

Mr. Steven Y.K. Chang, P.E., Chief  
State of Hawaii  
Department of Health, Solid and Hazardous Waste Branch  
P.O. Box 3378  
Honolulu, HI 96801-3378

Dear Mr. Chang:

**Subject:** Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; TMK 2-6-022: 009, 014,  
and 024

Thank you for your comments to the above mentioned subject. We will forward the information regarding solid waste to the project contractor.

Sincerely,

Lisa Leonillo Imata  
Planner

315 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813  
Tel (808) 521-9118  
Fax (808) 521-9168



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 3178  
HONOLULU, HAWAII 96801-3178

ORTON L. FURUKO, M.D.  
DIRECTOR OF HEALTH

IN THIS PERMIT MADE TO  
DUG/CWB

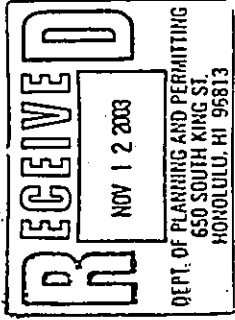
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November 6, 2003

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, Chapter 343  
Waikiki Special District (Major) Permit



The Department of Health, Clean Water Branch (CWB), has reviewed the subject document and offers the following comments:

1. The Army Corps of Engineers should be contacted at (808) 438-9258 to identify whether a Federal license or permit (including a Department of Army permit) is required for this project. Pursuant to Section 401(a)(1) of the Federal Water Pollution Act (commonly known as the "Clean Water Act"), a Section 401 Water Quality Certification is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters...."
2. A National Pollutant Discharge Elimination System (NPDES) general permit coverage is required for the following activities:
  - a. Storm water associated with industrial activities, as defined in Title 40, Code of Federal Regulations, Sections 122.26(b)(14)(i) through 122.26(b)(14)(ix) and 122.26(b)(14)(xi).
  - b. Construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the commencement of the construction activities.
  - c. Discharges of treated effluent from leaking underground storage tank remedial activities.
  - d. Discharges of once through cooling water less than one (1) million gallons per day.

Mr. Eric G. Crispin  
November 6, 2003  
Page 2

- e. Discharges of hydrotesting water.
- f. Discharges of construction dewatering effluent.
- g. Discharges of treated effluent from petroleum bulk stations and terminals.
- h. Discharges of treated effluent from well drilling activities.
- i. Discharges of treated effluent from recycled water distribution systems.
- j. Discharges of storm water from a small municipal separate storm sewer system.
- k. Discharges of circulation water from decorative ponds or tanks.

The CWB requires that a Notice of Intent (NOI) to be covered by a NPDES general permit for any of the above activities be submitted at least 30 days before the commencement of the respective activities. The NOI forms may be picked up at our office or downloaded from our website at <http://www.state.hi.us/doh/eh/cwb/forms/genli-index.html>.

3. The applicant may be required to apply for an individual NPDES permit if there is any type of activity in which wastewater is discharged from the project into State waters and/or coverage of the discharge(s) under the NPDES general permit(s) is not permissible. An application for the NPDES permit is to be submitted at least 180 days before the commencement of the respective activities. The NPDES application forms may also be picked up at our office or downloaded from our website at <http://www.state.hi.us/doh/eh/cwb/forms/ndiv-index.html>.

4. Hawaii Administrative Rules, Section 11-55-38, also requires the owner to either submit a copy of the new NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the DOH that the project, activity, or site covered by the NOI or application has been or is being reviewed by SHPD. Please submit a copy of the request for review by SHPD or SHPD's determination letter for the project.

If you have any questions, please contact the CWB at 586-4309.

Sincerely,

DENIS R. LAU, P.E., CHIEF  
Clean Water Branch



PLANPACIFIC

January 20, 2004

Mr. Denis R. Lau, P.E., Chief  
State of Hawaii  
Department of Health, Clean Water Branch  
P.O. Box 3378  
Honolulu, HI 96801-3378

Dear Mr. Lau:

Subject: **Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; THK 2-6-022; 009, 014,  
and 024**

Thank you for your comments to the above mentioned subject. Below are itemized responses, following the numbering in your letter:

1. **Clean Water Act:** The project is not located along navigable waters and construction activities will not include discharge into navigable waters.
2. **NPDES Permit:**
  - a. The project will not generate storm water associated with industrial activities.
  - b. The project will not involve clearing, grading, or excavation that result in the disturbance of equal to or greater than one (1) acre of total land area. Although parcel 009 has a total land area of 43,628 sf, only 38,287 sf will be altered. The portion with the existing parking structure will remain undisturbed.
  - c. The project does not involve underground storage tanks.
  - d. The project does not involve discharges of once-through cooling water.
  - e. The project does not involve discharges of hydrotesting water.
  - f. Shallow footings will be used for the new structure and thus, no de-watering activities are anticipated.
  - g. The project does not involve discharges of treated effluent from petroleum bulk stations and terminals.

Letter to Denis R. Lau, Chief of Clean Water Branch  
January 20, 2004 - page 2

- h. The project does not involve discharges of treated effluent from well drilling activities.
  - i. The project does not involve discharges of treated effluent from recycled water distribution systems.
  - j. The project does not involve discharges of storm water from a small municipal separate storm sewer system.
  - k. The project does not involve discharges of circulation water from decorative ponds or tanks.
3. **Individual NPDES Permit:** The project does not involve discharge into State waters and will not require an individual NPDES permit.
  4. **HAR Section 11-55.38:** The project has been reviewed by the State Historic Preservation Division. A copy of their letter is enclosed.

Thank you again for your comments.

Sincerely,

*Lisa Leonillo Imata*  
Lisa Leonillo Imata  
Planner

Encl.

345 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813  
Tel (808) 521-9418  
Fax (808) 521-9468

LINDA LINDLE  
COMMISSIONER OF HAWAII



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STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
HISTORIC PRESERVATION DIVISION  
KAKUHIHEVA BUILDING, ROOM 355  
601 KAOHOLA BOULEVARD  
KAPOLEI, HAWAII 96707

PETER E. YOUNG  
COMMISSIONER  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION OF NATURAL RESOURCES MANAGEMENT  
DAN DAVENSON  
COUNTY DIRECTOR, LAND  
ERNEST YUK LAU  
DEPUTY DIRECTOR, WATER  
JONAS BERGHAUSEN  
SOUTH AND WESTERN REGION  
IN CHARGE OF CONSERVATION  
COMMISSION AND COASTAL ZONING  
CONSERVATION AND EDUCATION DIVISION  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND  
ARCHAEOLOGY DIVISION  
STATE HAWAII

November 4, 2003

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

LOG NO: 2003.2244  
DOC NO: 0311E103

Dear Mr. Crispin:

**SUBJECT:** Chapter 6E-42 Historic Preservation Review - Draft Environmental Assessment for Robertson Properties Group, Waikiki Kalakaua Retail, 2284 Kalakaua Avenue, Waikiki Special District Permit (Major) [2003/ED-23(gu)]  
Waikiki, Kona, O'ahu  
TMK: (1) 2-6-022-009.014 and 024

Thank you for the opportunity to comment on the Waikiki Special District Permit (Major) for the Waikiki Kalakaua Retail project to construct a new building on parcel 9 (former Waikiki Theater 3). We received the DEA and permit for review on October 29, 2003.

**Archaeology Comments**  
Section 2.3 Historic and Cultural Characteristics, provides an adequate summary of the results of an archaeological assessment and cultural impact assessment conducted of the project area and is included in full in Appendix C. Section 3.6 accurately reflects our earlier comments in August 2003 during the Pre-Assessment phase of this project, that an archaeological inventory survey be conducted after demolition of the existing building in order to identify historic sites that may be present on the subject parcel. Our complete comments are included in Appendix A (SHPD Log. 2003.195), August 28, 2003).

We reiterate that if significant deposits are present, that are significant solely for their information content that archaeological salvage or data recovery may need to be done. If significant historic sites like human burials are present, then other forms of mitigation (such as preservation) would need to be considered. These mitigation measures, if necessary, will require additional time for fieldwork, evaluation and report production and review before the start of new construction.

Eric G. Crispin, Director  
Page Two

**Architectural Comments**

The Robertson Properties Group and their consultants have agreed to salvage the following items:

1. The five decorative grilles for potential re-use in the future development.
2. The faux leather doors.
3. The organ pipes which have been salvaged.
4. We have received the photo-documentation earlier this year.

We recommend changing the sentence on page 14 of the DEA which states that SHPD found that the building "had no significant historic value." While we believe that the building has been significantly altered, there are still elements that do have significant value, including the original design by Dickey that has been recorded through photo-documentation.

Should you have any questions about archaeology, please feel free to call Sara Collins at 692-8026 or Elaine Jourdan at 692-8027. Should you have any questions about architectural matters, please feel free to contact Tonia Moy at 692-8030. Should you have any questions about burial matters, please feel free to contact Kai Markell, Burial Sites Program at 587-0008.

Aloha,

*P. Holly McEldowney*

P. Holly McEldowney, Acting Administrator  
State Historic Preservation Division

Eljck

c: A. Van Horn Diamond, Chair, O'ahu Island Burial Council  
Kai Markell, Burial Sites Program



LEIOLUWALE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 3378  
HONOLULU, HAWAII 96813

2:50 PM '03

DEBORAH L. YOUNG, M.D.  
DIRECTOR OF HEALTH

By e-mail: [deborah.young@hawaii.gov](mailto:deborah.young@hawaii.gov)  
EAO 1785

OI 6 022 009 wfd w10  
EPO 01-123 WR610123

November 13, 2003

Mr. Geri Ung  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Ms. Ung:  
Subject: Draft Environmental Assessment  
Waikiki Kalakaua Retail  
Applicant-Robertson Properties Group  
2284 Kalakaua Avenue  
TMK: (1) 2-6-022: parcels 009, 014 and 024

We have reviewed the subject document which proposes a new structure to house retail businesses and restaurants. The proposed building is planned for three (3) stories and will have a footprint of 15,770 sf covering a smaller percentage of the lot than the existing building. When plans are finalized, however, it is possible that the size of the structure could be reduced to one or two stories.

As wastewater treatment and disposal from the proposed development will be via a 10-inch sewer line that runs to Seaside Avenue and then connects to the City sewer service system, we have no objections to the proposed project.

All wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please contact the Planning & Design Section of the Wastewater Branch at 586-4294.

Sincerely,

HAROLD K. YEE, P.E., CHIEF  
Wastewater Branch

LNK:erm

LEIOLUWALE  
GOVERNOR OF HAWAII



2:00 PM '03

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
HISTORIC PRESERVATION DIVISION  
KAKUHIHEVA BUILDING, ROOM 555  
901 KAAHAKOULA BOULEVARD  
HONOLULU, HAWAII 96813



PETER S. YOUNG  
Commissioner  
BUREAU OF LAND AND NATURAL RESOURCES  
COMMISSION ON NATURAL RESOURCE MANAGEMENT  
DAN DAVIDSON  
DEPUTY DIRECTOR  
ERNEST Y. K. LAU  
DEPUTY DIRECTOR  
LAND RESOURCES  
PLANNING AND ZONING REGULATION  
BUREAU OF ZONING PERMITS  
CONSTRUCTION AND COASTAL LANDS  
CONSERVATION AND RESOURCE ENFORCEMENT  
FORESTRY AND WILDLIFE  
HAWAIIAN HISTORIC PRESERVATION COMMISSION  
LAND  
STATE PARKS

November 4, 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 Robertson Properties Group, Waikiki Kalakaua Retail, 2284 Kalakaua Avenue, Waikiki Special District Permit (Major) [2003/ED-23(gu)]  
Waikiki, Kona, O'ahu  
TMK: (1) 2-6-022: 009, 014 and 024

LOG NO: 2003.2244  
DOC NO: 0311EJ03

Thank you for the opportunity to comment on the Waikiki Special District Permit (Major) for the Waikiki Kalakaua Retail project to construct a new building on parcel 9 (former Waikiki Theater 3). We received the DEA and permit for review on October 29, 2003.

Archaeology Comments

Section 2.3 Historic and Cultural Characteristics, provides an adequate summary of the results of an archaeological assessment and cultural impact assessment conducted of the project area and is included in full in Appendix C. Section 3.6 accurately reflects our earlier comments in August 2003 during the Pre-Assessment phase of this project, that an archaeological inventory survey be conducted after demolition of the existing building in order to identify historic sites that may be present on the subject parcel. Our complete comments are included in Appendix A (SHPD Log: 2003.1951, August 28, 2003).

We reiterate that if significant deposits are present, that are significant solely for their information content that archaeological salvage or data recovery may need to be done. If significant historic sites like human burials are present, then other forms of mitigation (such as preservation) would need to be considered. These mitigation measures, if necessary, will require additional time for fieldwork, evaluation and report production and review before the start of new construction.

Eric G. Crispin, Director  
Page Two

Architectural Comments

The Roberson Properties Group and their consultants have agreed to salvage the following items:

1. The five decorative grilles for potential re-use in the future development.
2. The faux leather doors.
3. The organ pipes which have been salvaged.
4. We have received the photo-documentation earlier this year.

We recommend changing the sentence on page 14 of the DEA which states that SHPD found that the building "had no significant historic value." While we believe that the building has been significantly altered, there are still elements that do have significant value, including the original design by Dickey that has been recorded through photo-documentation.

Should you have any questions about archaeology, please feel free to call Sara Collins at 692-8026 or Elaine Jourdan at 692-8027. Should you have any questions about architectural matters, please feel free to contact Tonia Moy at 692-8030. Should you have any questions about burial matters, please feel free to contact Kai Markell, Burial Sites Program at 587-0008.

Aloha,

*P. Holly McEldowney*

P. Holly McEldowney, Acting Administrator  
State Historic Preservation Division

EJ:jk

c: A. Van Horn Diamond, Chair, O'ahu Island Burial Council  
Kai Markell, Burial Sites Program



PLAN PACIFIC

January 23, 2004

Ms. P. Holly McEldowney, Acting Administrator  
State Historic Preservation Division  
Department of Land and Natural Resources  
601 Kamohila Boulevard, Rm. 555  
Kapolei, Hawaii 96707

Dear Ms. McEldowney:

Subject: Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; TMK 2-6-022: 009, 014,  
024

Thank you for your comment letter dated November 4, 2003. Following is an itemized response to your comments:

**Archaeology:** The archaeological inventory survey will be undertaken after demolition of the existing Waikiki Theater 3 building and appurtenant structures. We understand that mitigation measures may be required, depending on the survey findings.

**Architecture:** The Robertson Properties Group has agreed to salvage the faux leather doors and the exterior metal grilles, in addition to the salvage and photo-documentation already completed. Per your comment, the EA has been revised to reflect the actual wording of the SHPD's review letter (see Section 2.3, Historic Resources).

Sincerely,

*Lisa Leonillo Imata*  
Lisa Leonillo Imata  
Planner

345 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813

Tel: (808) 521-9418  
Fax: (808) 521-9468

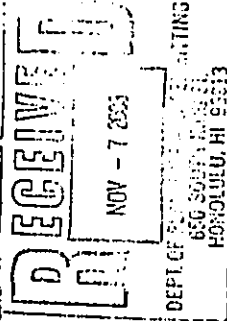
RODNEY K. HARAGA  
DIRECTOR  
Deputy Director  
BRUCE Y. MATSUDA  
LINDSEY H. JOESTING  
BRIAN H. SERRANO  
BY REVY REFER TO  
STP 8.0930



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

November 3, 2003

LINDA LINGKE  
GOVERNOR



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: Waikiki Special District Permit (Major), Robertson Properties Group  
Draft Environmental Assessment (DEA) for  
Waikiki Kalakaua Retail  
TMK: 2-6-22: 9, 12, & 24

In reply to your request for our review and comments on the subject application, this is to advise you that the project to redevelop the site of the former theaters will not have a direct impact on our State transportation facilities.

We appreciate the opportunity to provide our comments.

Very truly yours,

RODNEY K. HARAGA  
Director of Transportation

LINDA LINGKE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL  
228 SOUTH BERENSON STREET  
HONOLULU, HAWAII 96813  
TELEPHONE: (808) 586-4185  
FACSIMILE: (808) 586-4185  
E-mail: oeqc@hawaii.gov

November 25, 2003

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

Attn: Geri Ung

Dear Mr. Crispin:

Subject: Draft Environmental Assessment (EA) for Waikiki Kalakaua Retail

We have the following comments to offer:

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/oeqc/guidance\\_sustainable.htm](http://www.state.hi.us/health/oeqc/guidance_sustainable.htm) or contact our office for a paper copy of the guidelines.

ADA: Will the new facility, both interior and exterior, be compliant with the Americans with Disabilities Act?

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

Sincerely,

GENEVIEVE SALMONSON  
Director

c: Tim Kolvoord, Robertson Properties  
Lisa Imata, PlanPacific



PHONE (808) 534-1348

FAX (808) 534-1343

2003 NOV 19 PM 3 50



CITY & COUNTY OF HONOLULU  
STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
711 KAPUOLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

January 20, 2004

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

Dear Ms. Salmonson:

Subject: Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; TMK 2-6-022: 009, 014,  
and 024

Thank you for your comments to the above mentioned subject. The project architect will consider the use of sustainable building techniques per your suggestion. Also, the proposed building and exterior access will be designed in compliance with the Americans with Disabilities Act.

Sincerely,

Lisa Leonillo Imata  
Planner

315 Queen Street  
Suite 802  
Honolulu  
Hawaii 96813

Tel (808) 521-9418  
Fax (808) 521-9468

HRD03/1146

November 17, 2003

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

RE: Request for Waikiki Special District Permit (Major), TMK 2-6-022: 9, 12 & 24

Dear Mr. Crispin,

OHA is in receipt of your October 27, 2003, request for review and comments on the Draft Environmental Assessment for the above-referenced project. OHA has no comment on the project at this time.

We emphasize the importance of an archaeological inventory survey, with subsurface testing, and a subsequent report being completed after demolition and before any new construction is begun on the project parcels. We also rely on your assurances that should iwi or Native Hawaiian cultural or traditional deposits be found during ground excavation, work will cease and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions, please contact me at 594-1962 [heidig@oha.org](mailto:heidig@oha.org).

Sincerely,

Heidi Guith  
Native Rights -- Policy Analyst



Board of Directors

- Gregory Wong  
President
- Thomas Bellow  
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- Joan Ngurova  
Executive Director

December 8, 2003

Mr. Tim Kolvoord  
Robertson Properties Group  
120 North Robertson Boulevard  
Los Angeles, CA 90048

Dear Mr. Kolvoord:

Aloha! I am Jeffrey Apaka a native Hawaiian, born and raised in Waikiki in the territorial days of the 40's. I am a graduate of Beverly Hills High School '64' but returned to my roots here in Hawai'i and have been totally involved with the Waikiki community.

Bob Hope discovered my father, Alfred Apaka in the early 1950's and that's how I ended up at the Beverly Hills Unified School District. I am a performer in Waikiki at the DFS Galleria twice weekly, owner and Vice President of the 4 Paddle condo board, Vice President of the Waikiki Neighborhood Board #9, member of Royal Hawaiian Society, Hale O Na Ali'i, special events committee of Waikiki Improvement Association, Director of Community Relations at Waikiki Community Center and a long time member of the Variety Club.

I would like to impress on you and my good friend Mike Foreman that Hawai'i needs your support in turning the clock back to the days when Waikiki the Queen Emma Foundation and the people of Hawai'i had an attraction that we truly admired "The Waikiki Theatre". Native islanders and visitors drove by only to see the shining lights of the marquee WAIKIKI it proclaimed that you were in the heart of the Hawaiian place "Waikiki".

The *Waikiki Theatre* was the most elegant theatre of the time. It was the Loew's Chinese Grumman's Theatre but in the territory of Hawai'i and now state. When visitors and local residents alike stepped out in the evenings and strolled down Kalakaua Avenue to seek tickets at the box office or just to be seen at the WAIKIKI Theatre.

I know I'm talking of the past but we still have the right to ask you to help preserve the Waikiki that we admire and need it to remain for the generations of Hawaiians and the visitors that finally arrive to see Hawai'i that was. I ask that your plans to demolish the theatre be turned down. It's an entire mistake. An adaptive reuse could have remained as a historical landmark but in the 1980's Consolidated removed the historical features.

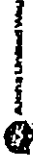
I can't ask for more than to save the Waikiki Theatre, it's facade, also to replace the water fountain with the bronze plaque of stars signatures that once grazed Waikiki. Plans should build tri-level shops with el fresco restaurants surrounding the fountain area (2 level-out side dining) and most of all keep the marquee WAIKIKI shining in the evenings.

Waikiki has lost the true meaning of the Waikiki we natives know and cherish. Keep Waikiki Waikiki and save the remains of the lost Waikiki that you have in your hands.

Aloha and Mahalo for your consideration in stopping the removal of old Waikiki that still stands and should remain.

  
Jeffrey A. Apaka

310 Paohalani Avenue  
Honolulu, Hawaii 96815  
Phone: 808 923-1807  
Fax: 808 923-7099  
Email: wec@plst.com



Celebrating 25 Years of Service to the Community

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To	Mr. Tim Kolvoord	From	Jeffrey A. Apaka		
Company	Robertson Properties Group	City	Los Angeles		
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January 20, 2004

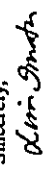
Mr. Jeffrey A. Apaka  
Waikiki Community Center  
310 Paohalani Avenue  
Honolulu, Hawaii 96815

Dear Mr. Apaka:

Subject: Draft Environmental Assessment (EA) for the Proposed  
Waikiki Kalakaua Retail Project; TMK 2-6-022; 009, 014,  
024

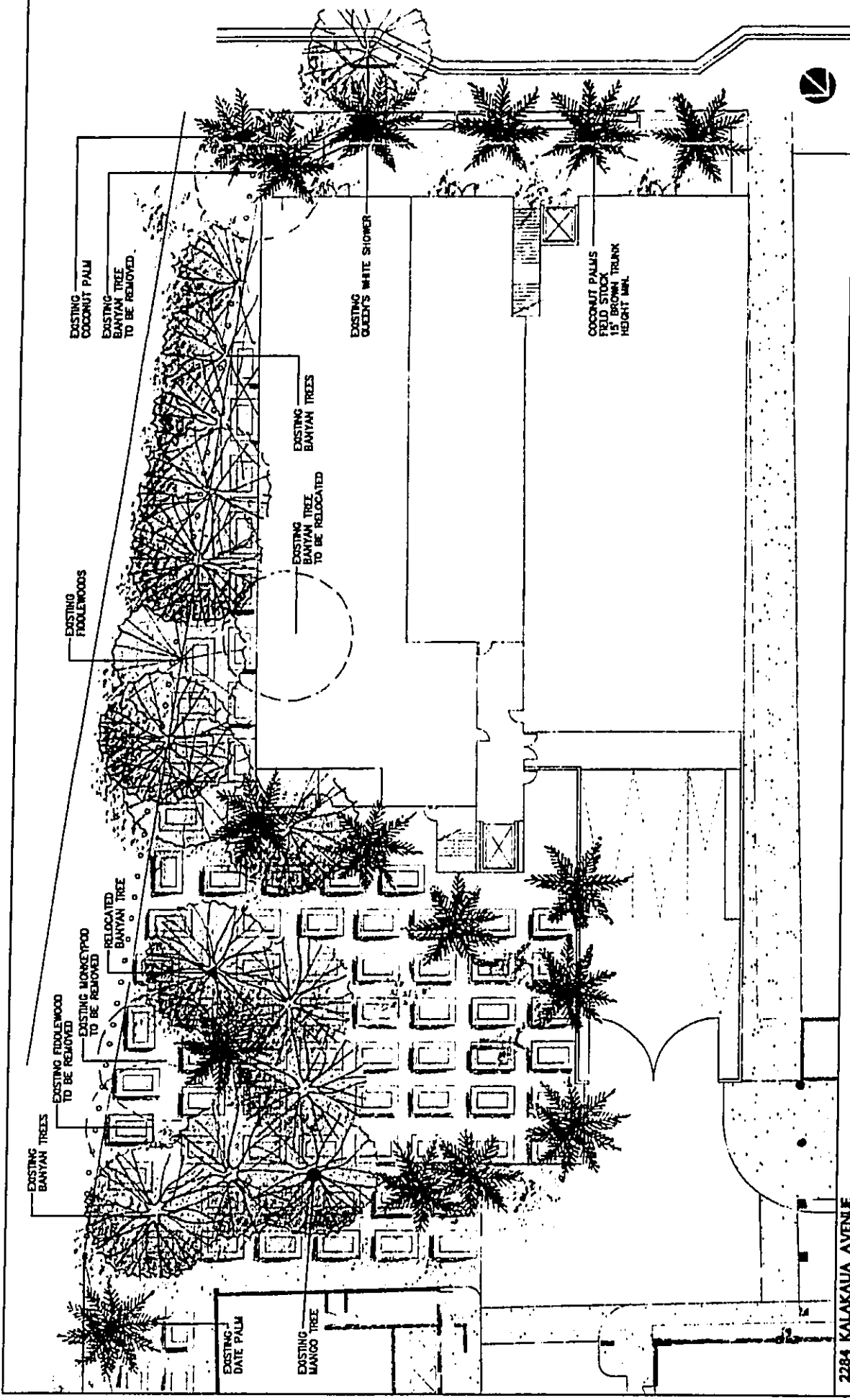
Thank you for your comment letter dated December 8, 2003. We acknowledge and appreciate the important history of Waikiki, and the memories associated with this site. While it is not feasible to preserve the Waikiki Theater building, plans call for the new structure to incorporate many elements of Hawaiian architecture.

Sincerely,

  
Lisa Leonillo Imata  
Planner

APPENDIX B  
Conceptual Landscape Plan

RECEIVED AS FOLLOWS

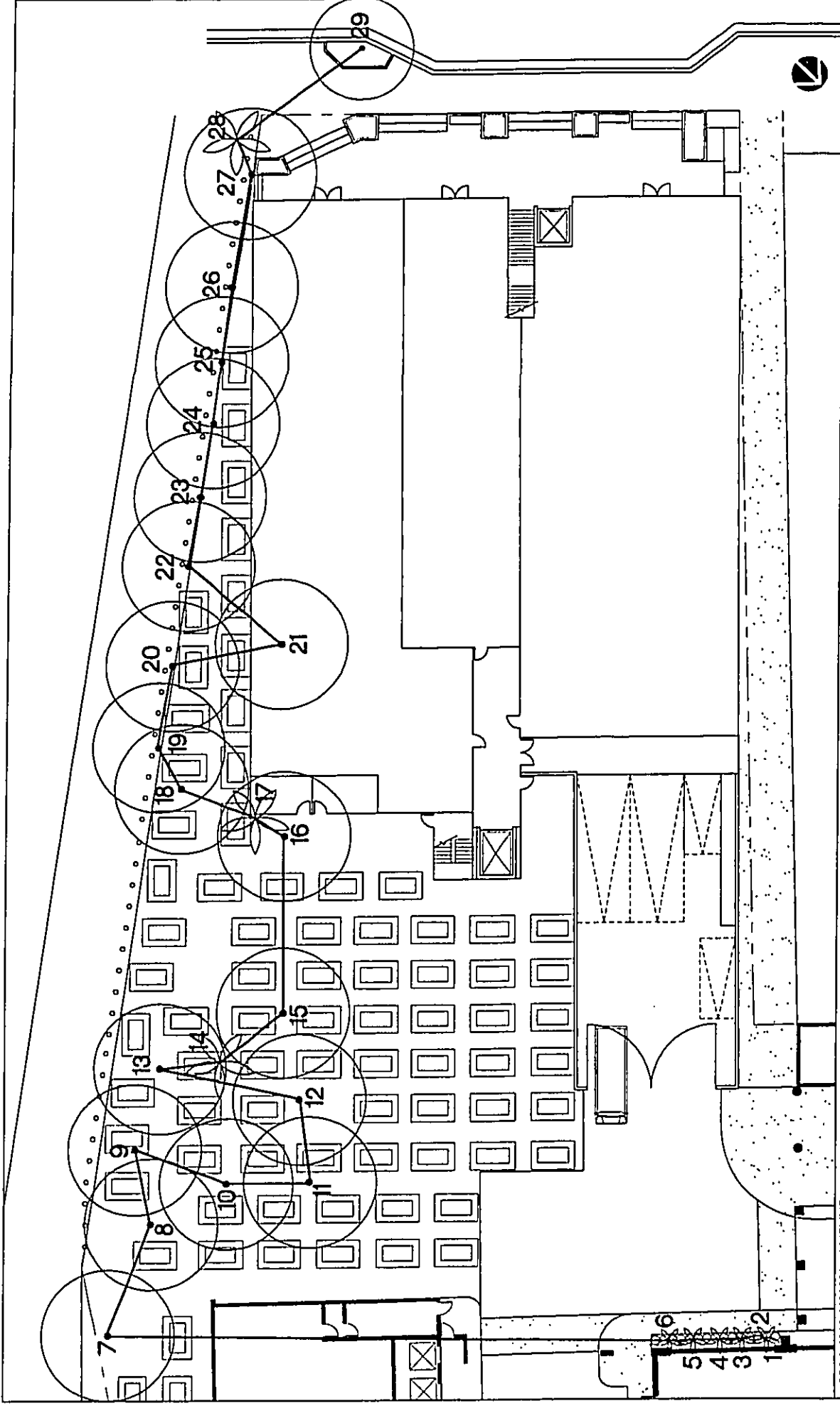


2284 KALAKAUA AVENUE  
 SCHEMATIC LANDSCAPE PLANTING PLAN  
 SEE REVISIONS NUMBER AND DATE. REFERENCE ONLY.  
 SCALE 1"=30'-0"

L-3



ARCHITECTS  
 HAWAII  
 LIMITED  
 09-19-03



2284 KALAKAUA AVENUE  
 TREE DISPOSITION PLAN

SCALE 1"=30'-0"  
 NOTE: INFORMATION PROVIDED FOR GENERAL REFERENCE ONLY.  
 BUILDING FOOTPRINT AND SQUARE FOOTAGE, EXISTING VEGETATION  
 AND CONDITIONS AS SHOWN OR AS NOTED BY OTHER SURVEYS.

L-1



09-19-03



TREE DISPOSITION LEGEND			
NO.	NAME	HEIGHT (FT.)	SPREAD (IN.)
1	MACARTHUR PALM	20	10
2	NATAL PLUM HEDGE	3	3
3	MACARTHUR PALM	20	10
4	MACARTHUR PALM	20	10
5	MACARTHUR PALM	20	10
6	MACARTHUR PALM	20	10
7	DATE PALM	50	12
8	BANYAN TREE	40	30
9	FIDDLEWOOD	30	30
10	BANYAN TREE	40	30
11	MANGO TREE	40	30
12	BANYAN TREE	40	30
13	MOKNEYPOD	-	-
14	COCONUT PALM	50	10
15	BANYAN TREE	40	30
16	BANYAN TREE	40	30
17	COCONUT PALM	50	10
18	FIDDLEWOOD	40	30
19	BANYAN TREE	40	30
20	FIDDLEWOOD	40	30
21	BANYAN TREE	40	30
22	BANYAN TREE	30	20
23	BANYAN TREE	30	20
24	BANYAN TREE	30	20
25	BANYAN TREE	30	20
26	BANYAN TREE	30	20
27	BANYAN TREE	30	20
28	COCONUT PALM	40	10
29	QUEEN'S WHITE SHOWER	20	10

TREE DISPOSITION INVENTORY				
DESCRIPTION	EXISTING TREE PALM OR SHrub TO REMAIN AND PROTECT DURING CONSTRUCTION	DOUBTful EXISTING TREE PALM OR SHrub TO REMAIN AND PROTECT DURING CONSTRUCTION (BELOW SURFACE)	RELOCATE EXISTING TREE PALM OR SHrub AND PROTECT DURING CONSTRUCTION	TOTAL
BANYAN TREE	11	1	1	13
FIDDLEWOOD	2	1		3
MANGO TREE	1			1
MOKNEYPOD TREE		1		1
QUEEN'S WHITE SHOWER	1			1
COCONUT PALM	3			3
DATE PALM	1			1
MACARTHUR PALM	5			5
NATAL PLUM HEDGE	1			1
TOTAL	25	3	1	29

2284 KALAKAUA AVENUE  
TREE DISPOSITION LEGEND

NOTE: INFORMATION PROVIDED FOR GENERAL REFERENCE ONLY. BUILDING FOOTPRINT AND SQUARE FOOTAGE INCLUDE VERIFICATION AND CONFIRMATION BY TOPOGRAHER OR TREE SURVEY.

L-2



ARCHITECTS  
HAWAII  
09-19-03

APPENDIX C  
Archaeological and Cultural Impact Assessment

Archaeological and Cultural Impact Assessment of a 1-Acre Parcel, 2284  
Kalakaua Avenue, Waikiki, Kona District, Island of O'ahu

TMK: 2-6-22: 9

by

Jon Tulchin, A.S.

and

Hallett H. Hammatt, Ph.D.

Prepared for  
Plan Pacific

345 Queen St., #802  
Honolulu, HI 96813

by

Cultural Surveys Hawai'i, Inc.  
September 2003

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I. INTRODUCTION

A. Project Background

At the request of Plan Pacific, Inc., Cultural Surveys Hawaii, Inc. (CSH) completed an archaeological assessment and cultural impact assessment of a 1-acre parcel on 2284 Kalakaua Avenue, Waikiki, Kona District, Island of O'ahu (TMK: 2-6-22:9) (Figures 1-3).

The project area has been fully developed since the building of the Waikiki Theater #3 in 1936. While there are currently no ongoing traditional cultural practices within the project area the cultural impact assessment provides data for understanding past activities.

Previously, SHPD/DLNR conducted a review of the historic architectural qualities of the Waikiki Theater #3 building, in conjunction with the owner's proposal to demolish the building. Inasmuch as the building has been substantially changed from its original state in 1936, SHPD/DLNR found that the building did not warrant preservation. The applicant has subsequently carried out salvage and documentation activities recommended by SHPD/DLNR. Consequently, historic architectural resources are not addressed in this study.

Based on the findings of the archaeological assessment and consultation with SHPD/DLNR (State Historic Preservation Division, Department of Land and Natural Resources), Plan Pacific has contracted with CSH to conduct an archaeological inventory survey when the existing building, the Waikiki Theater #3, is demolished. The survey will include test pit excavations and analysis of excavated material.

B. Scope of Work

The purpose of this archaeological assessment was to ascertain the potential of encountering any historic properties during ground disturbance within the project area. Additionally, background research was conducted to provide the historical and archaeological context from which project area land use could be synthesized. The assessment does not meet the SHPD/DLNR requirements for a more intensive inventory-level survey or OEQC guidelines for cultural impact assessments, but does provide sufficient data to make recommendations for future treatment as well as providing a basis for a complete cultural impact assessment.

The scope of work includes:

- 1) Historical research to include study of archival sources, historic maps, Land Commission Awards, and previous archaeological studies to construct a history of land use and to determine if archaeological sites have been recorded on or near this property.
- 2) Field inspection of the project area to identify any surface archaeological features and to investigate and assess the potential for impact to such sites. This assessment will identify any sensitive areas that may require further investigation or mitigation before future development projects proceed.

Preparation of a report to include the results of the historical research and the fieldwork with an assessment of archaeological potential based on that research; with recommendations for further

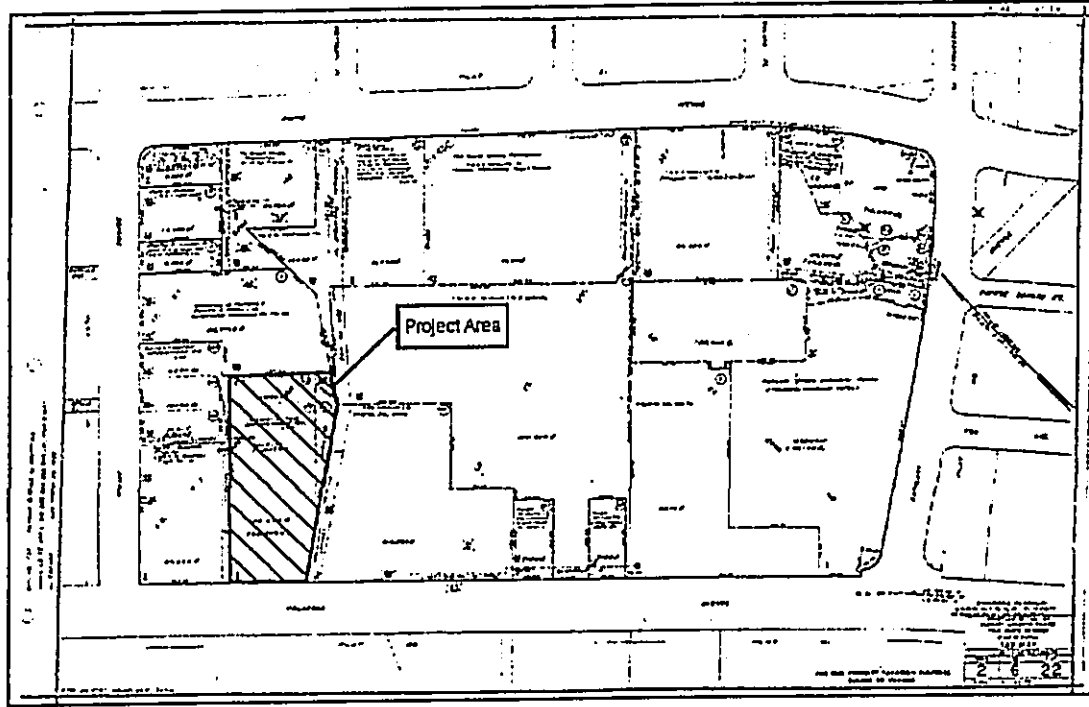


Figure 2 TMK: 2-6-22 Showing the Location of the Project Area

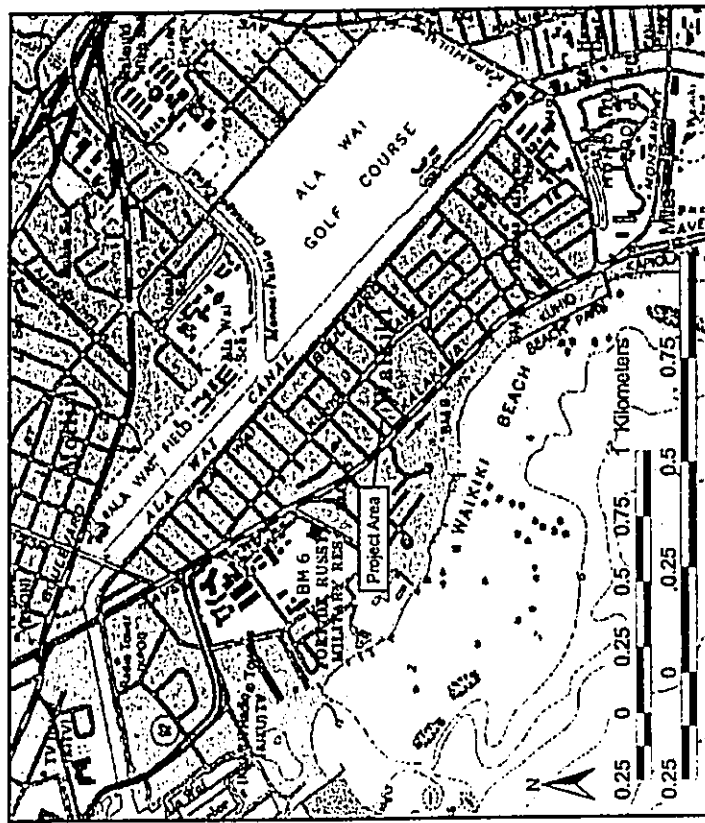


Figure 1 Portion of USGS Topographic Map, Honolulu Quadrangle, Showing the Location of the Project Area

## Introduction

archaeological work, if appropriate. It will also provide mitigation recommendations if there are archaeologically sensitive areas that need to be taken into consideration.

### C. Project Area Description

The project area consists of a 1-acre parcel in the contemporary environs of Waikiki. It is located at the current location of the Waikiki 3 Theater, 2284 Kalakaua Avenue, Waikiki. The project area is roughly rectangular in shape and is situated in the block bounded by Kalakaua Avenue, Seaside Avenue, Kūhiō Avenue, and Duke's Lane.

The elevation of the project area is approximately 11 feet A. M. S. L. Annual rainfall ranges from 24 to 31 inches (Giambelluca *et al.* 1986). Soils within the project area consist of Jaucas sand (JaC) (Foote *et al.* 1972). Northeasterly trade winds prevail throughout the year, although their frequency varies from more than 90% during the summer months to 50% in the winter; the average annual wind velocity is approximately 10 miles per hour (Okamoto 1998:2-1).

### D. Methods

#### 1. Background Research

Background research included: a review of previous archaeological studies on file at the State Historic Preservation Division of the Department of Land and Natural Resources; review of documents at the Hamilton Library of the University of Hawai'i, the Hawai'i State Archives, the Mission Houses Museum Library, the Hawai'i Public Library, and the Archives of the Bishop Museum; study of historic photographs at the Hawai'i State Archives and the Archives of the Bishop Museum; and study of historic maps at the Survey Office of the Department of Land and Natural Resources.

#### 2. Field Methods

No field inspection of the project area was conducted as the present project area is the existing Waikiki 3 Theater. The historic architectural nature of the structure has been addressed by SDPD/DLNR Architectural Staff.

Introduction



Figure 3 Aerial Photograph Showing the Location of the Project Area

## II. HISTORICAL BACKGROUND

A. Pre-Contact to Early 1800's  
 Waikīki, by the time of the arrival of Europeans in the Hawaiian Islands during the late eighteenth century, had long been a center of population and political power on O'ahu. According to Martha Beckwith (1940), by the end of the fourteenth century Waikīki had become "the ruling seat of the chiefs of Oahu." The preeminence of Waikīki continued into the eighteenth century and is betokened by Kamehameha's decision to reside there upon wresting control of O'ahu by defeating the island's chief, Kalanikūpule. The 19th-century Hawaiian historian John Papa 'I'i, himself a member of the *alii* (chiefly class), described the king's Waikīki residence:

Kamehameha's houses were at Puuailiili, *makani* of the old road, and extended as far as the west side of the sands of Apuakehau. Within it was Helumoa where Ka'ahumānu *mā* went to while away the time. The king built a stone house there, enclosed by a fence . . . ('I'i 1959:17).

'I'i further noted that the "place had long been a residence of chiefs. It is said that it had been Kekuapoi's home, through her husband Kahahana, since the time of Kahekeili" ('I'i 1959:17). Chiefly residences, however, were only one element of a complex of features – sustaining a large population – that characterized Waikīki up to pre-contact times. Beginning in the fifteenth century, a vast system of irrigated taro fields was constructed, extending across the littoral plain from Waikīki to lower Mānoa and Pālolo valleys. This field system – an impressive feat of engineering the design of which is traditionally attributed to the chief Kalamakua – took advantage of streams descending from Makiki, Mānoa and Pālolo valleys which also provided ample fresh water for the Hawaiians living in the *ahupua'a*. Water was also available from springs in nearby Mō'ili'i and Punahou. Closer to the Waikīki shoreline, coconut groves and fishponds dotted the landscape. A sizeable population developed amidst this Hawaiian-engineered abundance. Captain George Vancouver, arriving at "Whyteete" in 1792, captured something of this profusion in his journals:

On shores, the villages appeared numerous, large, and in good repair; and the surrounding country pleasingly interspersed with deep, though not extensive valleys: which, with the plains near the sea-side, presented a high degree of cultivation and fertility.

[Our] guides led us to the northward through the village, to an exceedingly well-made causeway, about twelve feet broad, with a ditch on each side.

This opened our view to a spacious plain, which, in the immediate vicinity of the village, had the appearance of the open common fields in England; but, on advancing, the major part appeared to be divided into fields of irregular shape and figure, which were separated from each other by low stone walls, and were in a very high state of cultivation. These several portions of land were planted with the eddo or taro root, in different stages of inundation; none being perfectly dry, and some from three to six or seven inches under water. The causeway led us near a

mile from the beach, at the end of which was the water we were in quest of. It was a rivulet five or six feet wide, and about two or three feet deep, well banked up, and nearly motionless; some small rills only, finding a passage through the dams that checked the sluggish stream, by which a constant supply was afforded to the taro plantations.

[We] found the plain in a high state of cultivation, mostly under immediate crops of taro; and abounding with a variety of wild fowl, chiefly of the duck kind . . . The sides of the hills, which were at some distance, seemed rocky and barren; the intermediate valleys, which were all inhabited, produced some large trees, and made a pleasing appearance. The plain, however, if we may judge from the labour bestowed on their cultivation, seemed to afford the principal proportion of the different vegetable productions on which the inhabitants depend for their subsistence. (Vancouver 1798: I, 161-164)

Further details of the exuberant life that must have characterized the Hawaiians use of the lands that included the *ahupua'a* of Waikīki are given by Archibald Menzies, a naturalist accompanying Vancouver's expedition:

The verge of the shore was planted with a large grove of coconut palms, affording a delightful shade to the scattered habitations of the natives. Some of those near the beach were raised a few feet from the ground upon a kind of stage, so as to admit the surf to wash underneath them. We pursued a pleasing path back to the plantation, which was nearly level and very extensive, and laid out with great neatness into little fields planted with taro, yams, sweet potatoes and the cloth plant. These, in many cases, were divided by little banks on which grew the sugar cane and a species of *Draecena* without the aid of much cultivation, and the whole was watered in a most ingenious manner by dividing the general stream into little aqueducts leading in various directions so as to be able to supply the most distant fields at pleasure, and the soil seemed to repay the labour and industry of these people by the luxuriance of its productions. Here and there we met with ponds of considerable size, and besides being well stocked with fish, they swarmed with water fowl of various kinds such as ducks, coots, water hens, bitterns, plovers and curlews. (Menzies 1920:23-24)

However, the traditional Hawaiian focus on Waikīki as a center of chiefly and agricultural activities on southeastern O'ahu was soon to change – disrupted by the same Euro-American contact which produced the first documentation (including the records cited above) of that traditional life. The *ahupua'a* of Honolulu – with the only sheltered harbor on O'ahu – became the center for trade with visiting foreign vessels, drawing increasing numbers of Hawaiians away from their traditional environments. Kamehameha himself moved his residence from Waikīki to the coast near Honolulu harbor, likely in order to maintain his control of the lucrative trade in sandalwood that had developed. By 1828, the missionary Levi Chamberlain, describing a journey into Waikīki, would note:

Our path led us along the borders of extensive plats of marshy ground, having raised banks on one or more sides, and which were once filled with water, and replenished abundantly with esculent fish, but now overgrown with tall rushes waving in the wind. The land all around for several miles has the appearance of having once been under cultivation. I entered into conversation with the natives respecting this present neglected state. They ascribed it to the decrease of population. (Chamberlain 1957:26)

Tragically, the depopulation of Waikiki was not simply a result of the attractions of Honolulu (where, by the 1820's, the population was estimated at 6,000 to 7,000) but also of the European diseases that had devastating effects upon the Hawaiian populace.

#### B. Mid-Nineteenth Century and the Māhele

The depopulation of Waikiki, however, was not total and the *ahupua'a* continued to sustain Hawaiians living traditionally into the mid-19th century. Land Commission Award records associated with the mid-19th century Māhele document awardees continuing to maintain fishponds and irrigated and dry-land agricultural plots, though on a greatly reduced scale than had been previously possible with adequate manpower.

Toward the mid-19th century, the Organic Acts of 1845 and 1846 initiated the process of the Māhele – the division of Hawaiian lands – which introduced private property into Hawaiian society. In 1848, the crown (Hawaiian government) and the *ali'i* (royalty) received their land titles. Subsequently in the Māhele, Land Commission Awards (LCAs) for *kuleana* parcels were given to commoners and others who could prove residency on and use of the parcels they claimed.

An 1881 Hawaiian Government survey map by S.E. Bishop – with locations of LCA parcels indicated – provides a detailed record of the physical landscape of Waikiki before the transformations of the 20th century. When the map was copied in 1922, additional material from subsequent government surveys was added, including locations of road corridors not present in 1881. The map reveals an extensive complex of irrigated fields, streams and irrigation water courses, and ponds stretching inland from the Waikiki shoreline to the plains of Mō'i'i'i. Land Commission Award records for the awards shown on the map document houselots near the shore with associated taro *lo'i* located inland and houselots adjacent to inland taro *lo'i*. The records also indicate habitation and agricultural pursuits by the native Hawaiian population continuing into the mid-19th century. (Specific documentation of the present project area on the 1881 map and in LCA records is discussed below.)

#### C. Mid to Late 1800s

As the 19th century progressed, Waikiki was becoming a popular site among foreigners – mostly American – who had settled on O'ahu. An 1865 article in the Pacific Commercial Advertiser mentioned a small community that had developed along the beach. The area continued to be popular with the *ali'i* – the Hawaiian royalty – and several notables had residences there. A visitor to O'ahu in 1873 described Waikiki as "a hamlet of plain cottages, whither the people of Honolulu go to revel in bathing clothes, mosquitoes, and solitude, at odd times of the year" (Bliss 1873).

Other developments during the second half of the 19th century – prefiguring the changes that would alter the landscape of Waikiki during the 20th century – include the improvement of the road connecting Waikiki to Honolulu (the route of the present Kalākaua Ave.), the building of a tram line between the two areas, and the opening of Kapi'olani Park on June 11, 1877.

Traditional land-uses in Waikiki were abandoned or modified. By the end of the 19th century most of the fishponds that had previously proliferated had been neglected and allowed to deteriorate. The remaining taro fields were planted in rice to supply the growing numbers of immigrant laborers imported from China and Japan, and for shipment to the west coast of the United States.

As the sugar industry throughout the Hawaiian kingdom expanded in the second half of the 19th century, the need for increased numbers of field laborers prompted passage of contract labor laws. In 1852, the first Chinese contract laborers arrived in the islands. Contracts were for five years, and pay was \$3 a month plus room and board. Upon completion of their contracts, a number of the immigrants remained in the islands, many becoming merchants or rice farmers.

As was happening in other locales, in the 1880's, groups of Chinese began leasing and buying – from the Hawaiians of Waikiki – former taro lands for conversion to rice farming. The taro lands' availability throughout the islands in the late 1800's reflected the declining demand for taro as the native Hawaiian population diminished.

The Hawaiian Islands were well-positioned for rice cultivation. A market for rice in California had developed as increasing numbers of Chinese laborers immigrated there since the mid-19th century. Similarly, as Chinese immigration to the islands also accelerated, a domestic market opened.

The primary market for both husked rice and paddy raised in all parts of the Hawaiian Islands was in Honolulu. The number of Chinese in the islands created a large home demand.

In 1880 the home market was made more secure by an increase in the duty on rice imported into Hawaii to 1½ cents on paddy and 2½ cents on hulled rice. It resulted in further checking the importation of foreign rice and giving an immense impetus to the home product. (Coulter and Chun, 1937: 13)

By 1892, Waikiki had 542 acres planted in rice, representing almost 12% of the total 4,659 acres planted in rice on O'ahu. Most of the former taro *lo'i* converted to rice fields were located *mauka* of the present Ala Wai Boulevard.

#### D. 1900 to 1920

During the first decade of the 20th century, the U.S. War Department acquired more than 70 acres in the Kālia portion of Waikiki for the establishment of a military reservation called Fort DeRussy, named in honor of Brig. Gen. R.E. DeRussy of the Army Corps of Engineers.

On 12 November 1908, a detachment of the 1st Battalion of Engineers from Fort Mason, California, occupied the new post...



### Historical Background

Between 1909 and 1911 the engineers were primarily occupied with mapping the island of O'ahu. At DeRussy other activities also had to be attended to - especially the filling of a portion of the fishponds which covered most of the Fort. This task fell to the Quartermaster Corps, and they accomplished it through the use of an hydraulic dredger which pumped fill from the ocean continuously for nearly a year in order to build up an area on which permanent structures could be built. Thus the Army began the transformation of Waikiki from wetlands to solid ground. (Hibbard and Franzen 1986:79)

All the fishponds were filled by 1928.

A fire insurance map of 1914 shows that there were five areas in Waikiki where residential and commercial structures were concentrated in the early 20th century (Figure 4). These areas were located: 1) clustered at Saratoga Road and Lewers Road; 2) near the intersection of Ena Road and Kalakaua Avenue; 3) makai of Kalia Road on the east side of Ft. DeRussy; 4) clustered around the Moana Hotel on Kalakaua Avenue; and 5) in Kapahulu on the 'ewa side of Makee Road (the present Kapahulu Avenue). The fire insurance map also reveals the relative isolation of Waikiki, in the early 20th century, from the encroaching grid of modern Honolulu streets.

#### E. 1920's to 1930's

During the 1920's Waikiki landscape would be transformed when the construction of the Ala Wai Drainage Canal - begun in 1921 and completed in 1928 - resulted in the draining and filling in of the remaining ponds and irrigated fields of Waikiki (Figure 5 & 6). The canal was one element of a plan to urbanize Waikiki and the surrounding districts:

The [Honolulu city] planning commission began by submitting street layout plans for a Waikiki reclamation district. In January 1922 a Waikiki improvement commission resubmitted these plans to the board of supervisors, which, in turn, approved them a year later. From this grew a wider plan that eventually reached the Kapahulu, Mō'ili'ili, and McCully districts, as well as lower Makiki and Mānoa...

The standard plan for new neighborhoods, with allowances for local terrain, was to be that of a grid, with 80-foot-wide streets crossing 70-foot-wide avenues at right angles so as to leave blocks of house lots about 260 by 620 feet. Allowing for a 10-foot-wide sidewalk and a 10-foot right-of-way [alley] down the center of each block, there would be twenty house lots, each about 60 by 120 feet, in each block. (Johnson 1991:311)

During the course of the Ala Wai Canal's construction, the banana patches and ponds between the canal and the *mauka* side of Kalakaua Avenue were filled and the present grid of streets was laid out. These newly created land tracts spurred a rush to development in the 1930's. An article in the Honolulu Star-Bulletin in 1938 extolled the area's progress:

The expansion of apartment and private residence construction is no secret. Examination of building permits will show that more projects have been completed during the past year, and more are now underway in this area, than in any other section of the territory.

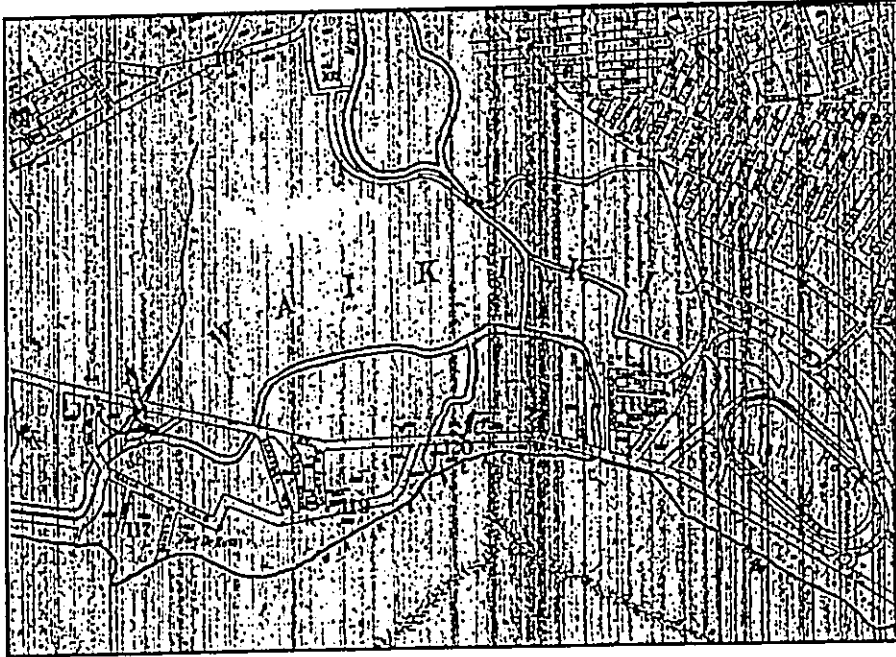


Figure 4 Portion of 1914 Sanborn Fire Insurance Map of Waikiki

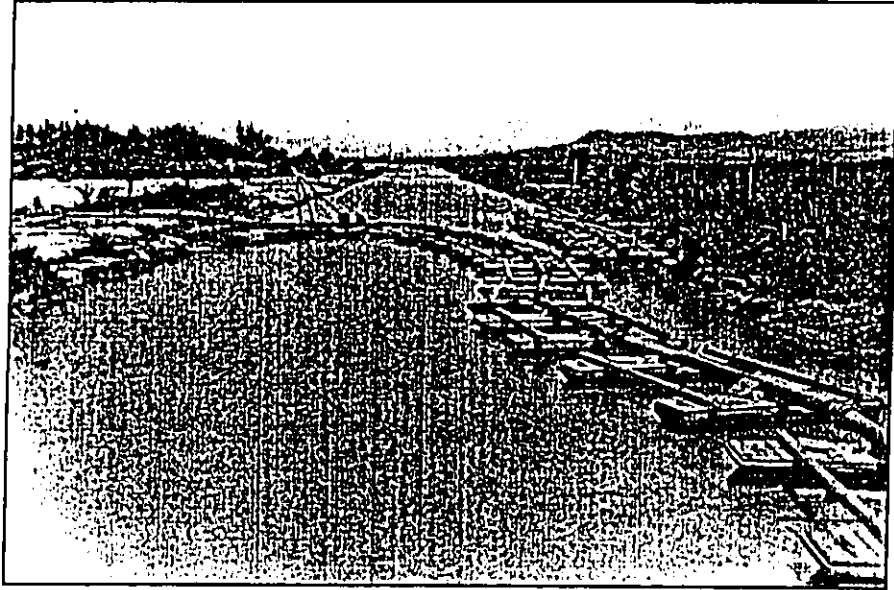


Figure 6 Floating Dredge Line in the Ala Wai Canal, circa 1924 (Bishop Museum Archives)



Figure 5 Aerial Photograph of Waikiki Before the Completion of the Ala Wai Drainage Canal (Hawai'i State Archives)

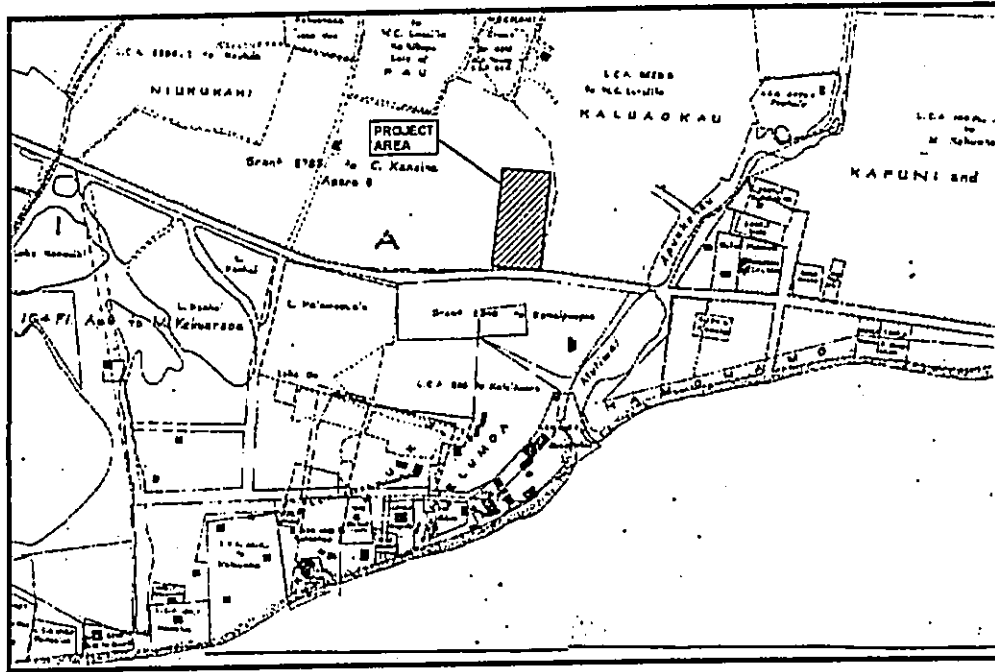


Figure 7 Portion of 1881 S.E. Bishop Map with the Approximate Location of the Project Area.

15

#### Historical Background

These developments are being made by island residents who have recognized the fact that Waikiki presents the unparalleled possibility for safe investment with excellent return. (Newton 1938: 10)

The writer speculated that the "future of Waikiki is assured."

#### F. 1940's

The entrance of the United States into World War II following the Japanese bombing of Pearl Harbor on December 7, 1941 put on hold plans for the development of Waikiki as a tourist destination. Until the war's end in 1945, the tourist trade was non-existent "...since the Navy controlled travel to and from Hawai'i and did not allow pleasure trips" (Brown 1989: 141). For the duration of the war, Waikiki was transformed into a recreation area for military personnel.

It was not the same Waikiki as before the war, though; barbed wire barricades now lined its sands, and there were other changes too. Fort DeRussy became a huge recreation center, with a dance hall called Maluhia that attracted thousands of men at a time. The Moana Hotel continued to function, but many other establishments and private homes in the area were taken over by the military. (Brown 1989:141)

Nearing the war's end, concerns began arising over the future of Waikiki. An article in the Honolulu Advertiser of July 16, 1945 (sec. 1, pg.1) decried "honky-tonks" that had sprung up in Waikiki during the course of the war, and asked: "Can anyone look at present-day Kalakaua Ave. - lined with makeshift curio shops, noisy 'recreation' centers, eyecores that pass under the name of lunchrooms and miscellany of 'joints' - and hope that Waikiki can stage a comeback [as a tourist destination]?"

#### G. 1950's

By the mid-1950's there were more than fifty hotels and apartments from the Kalia area to the Diamond Head end of Kapi'olani Park. The Waikiki population, by the mid-1950's, was not limited to transient tourists but included 11,000 permanent residents living in 4,000 single dwellings and apartments in stucco or frame buildings.

#### H. Historic Documentation of the Present Project Area

The present project area is shown on a portion of the 1881 government survey map by Bishop (Figure 7). The map indicates that, during the mid to late 1800s, the project area belonged to C. Kanana, father of W.C. Lunalilo who was awarded large tracts of land in Waikiki during the Mahele. Mahele documents associated with the project area do not reveal what specific activities or land usages were occurring at the mid-19th century. However, documentation for the *haleana* parcels (awarded to commoners and others who could prove residency on and use of the parcels) near the project area indicate specific ongoing traditional Hawaiian habitation and activity.

Documentation of LCA 228 awarded to Kaleiheana, located south of the project area, indicates that the parcel was used for both habitation and agricultural activities. Six houses were located on the parcel, as well as a coconut grove and *loi*.

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The Waikiki Reclamation Project of the 1920's included the dredging of the Ala Wai Canal. The dredged spoils were used as fill material throughout Waikiki. A review of historical documents and previous archeological research has illuminated the fact that the present project area still contains naturally deposited beach sand.

In 1936, the Waikiki Theater was built on the present project area (Hibbard and Franzen 1986). Hibbard and Franzen describe the architecture and interior design of the theater:

The premier movie palace in Hawaii, its C.W. Dickey design celebrated the beauty of both Hawaii's and current architectural trends. The theatre's interior décor placed the audience in a verdant papier-mâché landscape of Hawaiian flora, the work of Homer Merrill. A rainbow and palm trees framed the screen; banana trees, lauhala, papaya, night blooming cereus and other local plants adorned the walls; and hand-painted hibiscus in relief decorated the walls. (Hibbard and Franzen 1986: 120)

The Waikiki Theatre was renamed Waikiki Theatre #3 when the Waikiki Theatres #1 and #2 opened in 1969. The Waikiki Theatre #3 closed in 2002 and has remained closed up to the present day.

### III. PREVIOUS ARCHAEOLOGICAL RESEARCH

The *ahupua'a* of Waikiki, in the centuries before the arrival of Europeans, was an intensely utilized area, with abundant natural and cultivated resources that supported a large population. In the nineteenth and early twentieth centuries, after a period of depopulation, Waikiki was reanimated by Hawaiians and foreigners residing there, and by farmers continuing to work the irrigated field system which had been converted from taro to rice. Farming continued up to the first decades of the twentieth century until the Ala Wai Canal drained the remaining ponds and irrigated fields. Remnants of the pre-contact and historical occupation of Waikiki have been discovered and recorded in archaeological reports, usually in connection with construction activities related to urban development, or infrastructural improvements. These discoveries, which have occurred throughout Waikiki, have included many human burials, traditional Hawaiian and historic, as well as pre-contact Hawaiian and historic cultural deposits (Figure 8).

N.B. Emerson reported on the uncovering of human burials during the summer of 1901 on the property of James B. Castle - site of the present Eiks Club - in Waikiki during excavations for the laying of sewer pipes (Emerson 1902:18-20). Emerson noted:

The soil was white coral sand mixed with coarse coral debris and seashells together with a slight admixture of red earth and perhaps an occasional trace of charcoal.

The ground had been trenched to a depth of five or six feet, at about which level a large number of human bones were met with, mostly placed in separate groups apart from each other, as if each group formed the bones of a single skeleton. Many of the skulls and larger bones had been removed by the workmen before my arrival, especially the more perfect ones. (Emerson 1902:18)

Emerson's report on the find describes the remains of at least four individuals, all presumed to be Hawaiian. Associated burial goods were also exposed during excavation; these included "a number of conical beads of whale-teeth such as the Hawaiians formerly made" and "a number of round glass beads of large size." The glass beads "can be assigned with certainty to some date subsequent to the arrival of the white man" (Emerson 1902:19). Also located with the beads was "a small sized niho-palaoa, such as was generally appropriated to the use of the chiefs" which had been "carved from the tooth of the sperm-whale" and which was "evidently of great age" (Emerson 1902:19).

In the 1920's and 30's the first systematic archaeological survey of O'ahu was conducted by J. C. McAllister (1933). He recorded four *heiau*, three of which were located at the *manuka* reaches of Waikiki *ahupua'a* in lower Mānoa Valley. The fourth *heiau* - Papa'ena'ena - was located at the foot of Diamond Head crater in the environs of the present Hawai'i School for Girls. Papa'ena'ena Heiau is traditionally associated with Kamehameha I who was said to have visited the *heiau* before setting off to battle for Ni'ihau and Kauai in 1804. Five years later, according to John Papa 'Ūi, Kamehameha placed at Papa'ena'ena the remains of an adulterer - "all prepared in the customary manner of that time" (Ūi 1959:50-51). In 1963, two human skulls and other human remains were discovered in a construction trench at 2431 Prince Edward St. (Bishop Museum site Oa-A4-23, cited in Neller 1984).

Multiple burials were encountered in 1963 during excavation for the construction of the present Outrigger Canoe Club at the Diamond Head end of Kalakaua Avenue. As reported in a newspaper article on Jan. 24, 1963:

The Outrigger Canoe Club yesterday dedicated its new site (on land adjacent to and leased from the Elks Club), an ancient Hawaiian burial ground in Waikiki...

Robert Bowen of the Bishop Museum has been working closely with Ernest Souza, Hawaiian Dredging superintendent, on the removal of skeletons unearthed on the site, between the Colony Surf and the Elks Club...

Most of the bodies were buried in the traditional *ho'olewa* position, with the legs bound tightly against the chest.

One of the skeletons, Bowen said, shows evidence of a successful amputation of the lower forearm, indicating that the Hawaiians knew this kind of operation before the arrival of Europeans.

The ages of the skeletons ranged from children to 40-year-old men and women. The average life span of the Hawaiians at the time was about 32 years. (Honolulu Star-Bulletin; Jan. 24, 1963: 1A)

A total of twenty-seven burials were encountered (Yost 1971: 28). Apparently, no formal archaeological report on the burials was produced.

In 1964, sand dune burials, a traditional Hawaiian mortuary practice, were revealed as beach sand eroded fronting the Surf Rider Hotel (Bishop Museum Site Files).

In 1976, during construction of the Hale Koa Hotel, adjacent to the Hilton Hawaiian Village Hotel, six burials were unearthed, five of apparent prehistoric or early historic age, and one of more recent date (Bishop Museum Site Files).

In 1980, three burials were exposed at the Hilton Hawaiian Village during construction of the hotel's Tapa Tower. Earl Neller of the (then named) State Historic Preservation Program was called in upon discovery of the burials and conducted fieldwork limited to three brief inspection of the project area. Neller's (1980) report noted:

The bones from three Hawaiian burials were partially recovered; one belonged to a young adult male, on a young adult female, and one was represented by a single bone. An old map showed that rapid shoreline accretion had occurred in the area during the 1800s, and that the beach in the construction area was not very old. It is possible the burials date back to the smallpox epidemic of 1853. It is likely that burials will continue to be found in the area. It is also possible that early Hawaiian sites exist farther inland, beneath Māhū'ili, adjacent to where the shoreline would have been 1000 years ago. (Neller 1980:5)

Neller also documented the presence of trash pits, including one from the 1890s which contained "a large percentage of luxury items, including porcelain tablewares imported from China, Japan, the United States, and Europe" (Neller 1980:5). He further notes:

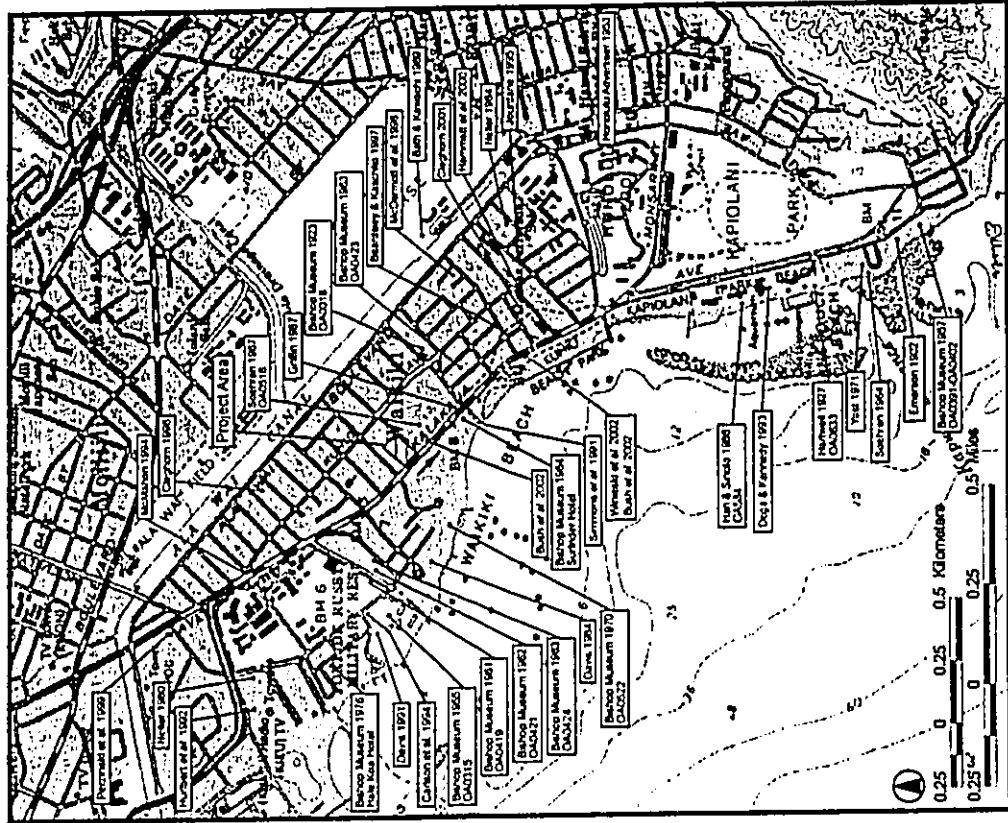


Figure 8 Archaeological Studies and Human Burial Discoveries in the Waikiki Area.

It is suspected that other important historic archaeological sites exist in the highly developed concrete jungle of Waikiki, with discrete, dateable trash deposits related to the different ethnic and social groups that occupied Waikiki over the last 200 years. (Neller 1980:5)

Between December 1981 and February 1982, archaeologists from the Bishop Museum led by Bertell Davis, conducted a program of excavations and monitoring during construction of the new Halekulani Hotel (Davis 1984). Six human burials were recovered along with "animal burials [and] cultural refuse from prehistoric Hawaiian firepits, and a large collection of bottles, ceramics, and other materials from trash pits and privies dating to the late 19th century" (Davis 1984:7). Age analysis of volcanic glass recovered from the site led Davis to conclude: "For the first time we can now empirically date...settlement in Waikiki to no later than the mid-1600s" (Neller 1980:5). Just as significant to Davis was the collection of historic era material at the Halekulani site; he states:

[The] Halekulani excavations clearly demonstrate...that there is a definite need to consider historic-period archaeology as a legitimate avenue of inquiry in Hawaiian research. Furthermore, archaeology in the urban context can yield results every bit as significant as in less developed areas. Development in the 19th and early 20th centuries clearly has not destroyed all archaeological resources in Waikiki, Honolulu, or in any of the other urbanized areas of Hawai'i. (Neller 1980:5)

In 1983, at the Lili'uokalani Gardens condominium construction site, seven traditional Hawaiian burials were recovered (Neller 1984). This had been the site of a bungalow owned by Queen Lili'uokalani at the end of the 19th century. In addition to the burials, the site contained plentiful historic artifacts, and a pre-historic cultural layer pre-dating the burials.

In 1985, International Archaeological Research Institute, Inc. performed archaeological monitoring and data recovery at the Pacific Beach Hotel Office Annex (Beardsley and Kaschko 1997). Two traditional Hawaiian burials were discovered and removed. Intact buried traditional Hawaiian cultural deposits were discovered, including a late pre-contact habitation layer, contained pits, firepits, post molds, artifacts, and food debris. The artifacts included basalt and volcanic glass flakes and cores, a basalt adze and adze fragments, worked pearl shells, a coral file and abraders, and a pearl shell fishhook fragment. Additionally, a late nineteenth century trash pit was discovered, which contained a variety of ceramics, bottles, and other materials.

During 1985 and 1986, archaeologists from Paul H. Rosendahl, Ph. D. Inc. conducted archaeological monitoring at the site of the Mechanical Loop Project at the Hilton Hawaiian Village, Waikiki. Much of this project area was disturbed by historic and modern construction and modification. Fifteen subsurface features were uncovered during the monitoring, all of which were determined to be historic trash pits or trenches. The dating of these features was based on dating the artifactual material they contained. All 15 features are thought to post-date 1881 based on this artifact analysis. The 3 partial burials reported by Neller (1980) were found within this project area (see above). No further burials were encountered during the PHRI field work (Hurlbert *et al.* 1992).

In 1987, a human burial was discovered and removed at the intersection of Kalākaua Ave. and Ka'ulani St. during excavations for a gas pipe fronting the Moana Hotel (Griffin 1987).

In 1988, the Moana Hotel Historical Rehabilitation Project (Simmons *et al.* 1991) encountered human remains that amounted to at least 17 individuals. Based on stratigraphic association these burials were inferred over time as the landfill at the site changed. The sediment surrounding these burials yielded traditional midden and artifact assemblages. The burials and human remains were found in the Banyan Court and beneath the hotel itself.

In 1989, skeletal remains were unearthed on the grounds of the Ala Wai Golf Course during digging of an electrical line trench for a new sprinkler system. The trench had exposed a pit containing two burials (Bath and Kawachi 1989: 2). The report suggests that one of the burials may have been disturbed earlier during grading for the Territorial Fair Grounds. The osteological analysis included in the report concludes that both sets of remains "appear ancient." (Bath and Kawachi 1989: 2)

Davis' (1989, 1991) excavation and monitoring work at Fort DeRussy documented substantial subsurface archaeological deposits--prehistoric, historic, and modern. These deposits included buried fishpond sediments, 'auwai sediments, midden and artifact enriched sediments, structural remains such as post holes and fire pits, historic trash pits, and a human burial. Davis' (1991) report documents human activity in the Fort DeRussy beach front area from the 16th century to the present.

The work at Fort DeRussy continued in 1992 when BioSystems researchers built upon Davis' work (Simmons 1995). BioSystems research documents the development and expansion of the fishpond and 'auwai (ditch) system in this area. Remains of the fishpond and 'auwai deposits, as well as habitation deposits were documented below modern fill deposits. This research, along with that of Davis (1991) clearly demonstrates that historical document research can be an effective guide to locating late prehistoric/early historic subsurface deposits, even amidst the development of Waikiki.

The realignment of Kālia Road at Fort DeRussy in 1993 uncovered approximately 40 human burials. A large majority of these remains were recovered in a large communal burial feature (Carlson *et al.* 1994). The monitoring and excavations associated with this realignment uncovered a culturally enriched layer that contained post holes.

In 1993, during construction activities at the Waikiki Aquarium, fragmentary human remains were discovered scattered in a back dirt pile, although no burial pit was identified (Dega and Kennedy 1993).

On April 28, 1994 an inadvertent burial discovery was made during excavation for a water line at the intersection of Kalākaua Ave. and Kuamo'o St. (just mauka of Ft. DeRussy). These remains represented a single individual (McMahon 1994).

In 1995, the remains of one individual were discovered *in situ* during construction activities on Paoakalani Street, fronting the Waikiki Sunset Hotel (Jourdane 1995).

In 1996 Pacific Legacy, Inc. conducted an archaeological inventory survey of the block bounded by Kalākaua Ave., Kūhiō Ave., 'Olohana St., and Kālamoku St. (Cleghorn 1996). The survey included the excavation of seven backhoe trenches. Subsurface testing indicated that:

...this area was extremely wet and probably marshy. This type of environment was not conducive for traditional economic practices...The current project area appears to have been unused because it was too wet and marshy. Several peat deposits, containing the preserved remains of organic plant materials were discovered and sampled. These deposits have the potential to add to our knowledge of the paleoenvironment of the area. (Cleghorn 1996:15)

The report concluded that no further archaeological investigations of the parcel were warranted since "no potentially significant traditional sites or deposits were found," but cautioned of the "possibility, however remote in this instance, that human burials may be encountered during large scale excavations" (Cleghorn 1996:15).

In 1996, a traditional Hawaiian burial was discovered and left in place during test excavations on two lots at Lil' uokalani Ave. and Tustiala Street (McDermott *et al.* 1996). Indigenous Hawaiian artifacts and historic artifacts were also found within the project area.

In 1997, during archaeological monitoring by Cultural Surveys Hawai'i, Inc. for the Waikiki Force Main Replacement project, scattered human bones were encountered on 'Ohua St. (Winiński and Hammatt 2000). These included the proximal end and mid-shaft of a human tibia, a patella, and the distal end and mid-shaft of a femur. These remains were within a coralline sand matrix that had been heavily disturbed by previous construction, and by the on-going construction project. No precise location for the original burial site was identified.

In April 1999, two human burials were inadvertently encountered near the intersection of Ena Road and Kalākaua Avenue during excavation activities for the first phase of the Waikiki Anti-crime Lighting Improvements Project (Perzinski *et al.* 1999).

From November 1999 to May 2000, forty-four human burials with associated cultural deposits were encountered during excavation for a waterline project on Kalākaua Avenue between the Ka'iulani and 'Ohua Avenues (Winiński *et al.* 2002a). Except for previously disturbed partial burials located in fill materials, the bulk of the burials were encountered within a coralline sand matrix. Additionally, a major cultural layer was found and documented.

From January 2000, to October 2000, ten human burials were encountered during archaeological monitoring of the Kūhiō Beach Extension / Kalākaua Promenade project (Winiński *et al.* 2002b). Six of these were located within a coralline sand matrix. The four others were partial and previously disturbed within fill. Additionally, a major cultural layer was found and documented, apparently part of the same major cultural layer associated with the waterline project between Ka'iulani and 'Ohua Avenues.

On May 2nd and June 14<sup>th</sup>, 2001, two *in situ* and two previously disturbed human burials were encountered at the site of a new Burger King (Cleghorn 2001a) and an adjoining ABC Store (Cleghorn 2001b). The finds were located at the intersection of 'Ohua Street and Kalākaua Avenue. Because of their proximity to five burials encountered during the Kalākaua 16" Water Main Installation (Winiński *et al.* 2002), they were included in the previously assigned State Site 50-80-14-5861. Three of these burials were recovered, and one was left in place. Volcanic glass fragments were found in association with one of the burials. A cultural layer was also observed which contained moderate to heavy concentrations of charcoal, and fragments of volcanic glass. Historic-era artifacts, including a bottle fragment, plastic and glass buttons, a ceramic fragment, and metal fragments, were also encountered within fill materials.

From July 1999 to October 2000, four sets of human remains were inadvertently encountered during excavation activities for the Waikiki Anti-Crime Street Lighting Improvement project along portions of Kalākaua Avenue (Bush *et al.* 2002). The first burial was encountered on Kalākaua Avenue, just before Duke's Lane and assigned State Site 50-80-14-5864. The burial was left in place. The second burial was encountered at the intersection of Kalākaua Avenue and Ka'iulani Avenue. Earlier, during archaeological monitoring for the water main project, two burials were encountered in the immediate area of the second burial find and assigned State site 50-80-14-5856 Features A and B. Due to the close proximity to the previously encountered burials, the second burial was assigned the same State Site 50-80-14-5856, and designated Feature C. Burials 3 and 4 were recovered at the intersection of Kalākaua Avenue and Kēalahilani, near an area of concentrated burials assigned State Site 50-80-14-5860 during monitoring for the water main project. Consequently, burials 3 and 4 were also assigned State Site 50-80-14-5860, features U and V. In addition to human remains, pre-contact deposits, historic and modern rubbish concentrations, and pond sediments were also encountered.

In summary, past archaeological research, from the beginning of the 20<sup>th</sup> century to the present has produced evidence that traditional Hawaiian cultural deposits, historic trash deposits, and, most notably, human burials, do exist throughout the breadth of the Waikiki area.

#### IV. CULTURAL IMPACT ASSESSMENT

Because the project area has been extensively developed, with the construction of the Waikiki Theater in 1936, the usual traditional and cultural practices studied in an assessment such as this one (i.e., gathering rights for cultural and religious purposes, plant resources, water rights, access issues related to gathering) were found to be virtually non-existent. Therefore, the focus of this study was to document past Hawaiian cultural practices within the project area and the Kālia area of Waikiki.

The pre-contact environment of the Kālia area was that of a coastal marsh / wetlands. Traditional Hawaiian cultural practices in this type of environment would include: the burial of the deceased in sand deposits; the construction of coastal trails; the construction and maintenance of inland fishponds; the practice of religious rituals in sacred areas; the harvesting of stream resources; the harvesting of marine resources; and the construction of agricultural fields and cultivation of taro. Each of these cultural practices are further discussed in detail.

##### A. Burials

The discovery of burials in the Waikiki area during recent construction projects have been a cause for concern over the last few years.

There are approximately 14,500 records associated with Land Commission Award claims during the *Māhele* of 1847-1853. Of these records, 428 are for claims both awarded and unawarded in Waikiki. Among these 428 claims, there is only one mention of a graveyard or burial place and it is in Claim 613 (to Kuluwalehua) which is not awarded (*Māhele* database 1998, [waiohona.com](http://waiohona.com)). Although it is uncertain where the reported burial ground is located, based on the boundaries given in the testimony (Native Register, Vol. 2: 299-300), it is speculated that it might be adjacent to the former location of Waikiki Church, near Kāiulani Avenue.

It seems the circumstance of the burials discovered in the vicinity of the project area is much more mundane than battle deaths or human sacrifices - namely that the vast majority of the deceased were the common people of Kālia. Withington (1953:16), probably referring to the *ōlav'u* plague [circa 1804], says: "A few years of peace settled over the Islands. Kamehameha and other warring chiefs took this opportunity to re-establish their forces, which had been greatly reduced through war and disease. A terrible epidemic of measles had attacked the people of the islands. It is claimed that more than three hundred bodies were carried out to sea from Waikiki in one day" (Withington: 1953: 16). It is possible that some of the Kālia burials discovered to date reflect such early depopulation by introduced diseases.

Rank seems to have had profound influences on places available for disposal. A king's body, or those of his attendants, could be placed within the district of the king's authority. Many geographical features were available. Fewer were available to lesser chiefs and their attendants, who were presumably limited to their own districts. The number of geographical features available for disposal seems to have decreased as rank decreased. Disposal for members of an extended family living in an *'iwi* was restricted to those geographical features located within the land unit, whether broken lava flats, lava tubes, earth plains, or sand dunes (Bowen 1961: 21).

According to Bowen (*Ibid.*), most Hawaiians in the pre-contact period belonged to the *maka āinana* or commoner class and their bones were usually buried in no other area than their particular *'iwi* (land division within an *ahupua'a*).

Burials are commonly reported from clean, consolidated sand deposits, and was clearly a common method of interment practiced by Hawaiians (Cleghorn 1987:42). One of the earliest references to traditional Hawaiian burial practices was made by Urey Litsiansky, who visited Hawai'i in June, 1804. He notes: "The poor are buried anywhere along the beach . . ." (1814: 122).

Commenting on the nature of burial areas and body positions used in burial, William Ellis (1827: 361-363) says: "The common people committed their dead to the earth in a most singular manner." The body was flexed, bound with cord, wrapped in a coarse mat, and buried one or two days after death. Graves were . . . either simply pits dug in the earth, or large enclosures . . . . Occasionally they buried their dead in sequestered places at a short distance from their habitations, but frequently in their gardens and sometimes in their houses. Their graves were not deep and the bodies were usually placed in them in a sitting posture" (*Ibid.*). Hawaiians placed significance on the *'iwi* which were regarded as a lasting physical manifestation of the departed person and spirit. "The bones of the dead were guarded, respected, treasured, venerated, loved or even deified by relatives; coveted and despoiled by enemies" (Pukui *et al.*, 1972:107).

It seems likely that the remains thus far documented in the vicinity of the project area relate to common mortuary practices.

A review of historic and archaeological records indicated that, to date, no burials have been identified within the immediate project area. However, it must be noted that the development and major construction of the buildings in the project area occurred long before NAGPPRA (1990) and the State of Hawai'i burial laws (1990) were instituted. Prior to the burial laws, when a burial was inadvertently discovered on a construction site, quite often the common practice of the construction workers was to bundle the *'iwi* (bones) together, wrap them in cloth or ti leaf and rebury them in a corner of the hole or trench. Burials were not necessarily reported and no documentation or records were required to be filed or kept. This makes it much more difficult to assess with any certainty whether burials are present within the project area. If there are burials in the project area, it is possible that they have been previously disturbed by prior construction.

##### B. Hawaiian Trails

John Papa 'I'i's account of the ancient trail leading from Honolulu into "lower Waikiki" places the trail within Kālia, south of the current project area. The trail is described as running . . . down to Piinaio; along the upper side of Kahanuikaikai's coconut grove, along the border of Kaihikapu Pond, into Kawehewehe; then through the center of Helumoa of Puaailii, down to the mouth of the Apuakehau stream . . . (1959:92) (Figure 9). Part of the coastal trail system, there are no visible trail remnants to speak of today.

##### C. Loko Ka'ohai

At one time, Waikiki was a network of thriving *lo'i* (taro) fields and fish ponds. Kālia was especially known for its large inland ponds (*loko pu'uone*) and its abundant stock of fish. The Hawaiian historian, Samuel Kamakau wrote that, "The *pu'uone* ponds near the sea, (*loko kai pu'uone*) were much desired by farmers, and these ponds they stocked (*ho'oholo*) with fish.



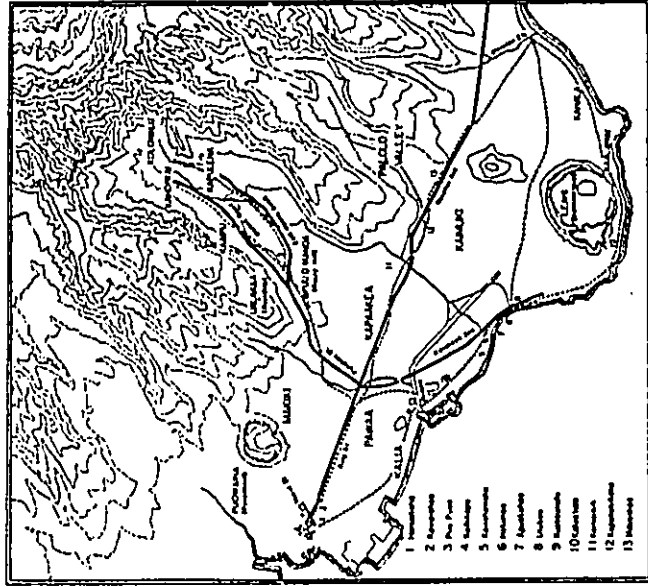


Figure 9  
Trails from Punchbowl Street to Waialeale as Described by 'I'i. Map by Gerald Ober ('I'i 1959:93).

*Pu'uone* ponds were close to shore ponds, *loko kuapā*, or to the seashore, and next to the mouths (*muku*) of streams (1976:49). During traditional times, the ponds were used to farm fish – usually for the Hawaiian *ali'i* (royalty). The *'ama 'ama* (mullet) and the *awa* (milkfish) were the two types of fish traditionally raised.

No doubt, these ponds were critical in feeding the large armies that landed in Waikīkī during times of war, as well as feeding the large retinue associated with chiefly residences in nearby Helunoa. John 'I'i mentions an incident where a particularly large catch of fish was given as tribute to Kīna'u – Kamehameha's son. The fish came from the nearby pond of Mochonua in Kālia (1959:49).

The ponds were also home to the *kōloa* (native duck) and other native water fowl – such as the *'auku'u* (heron), *'āiaie* *'ūia* (mudhen), *'āiaie* *ke'āiaie* *ke'āke'o* (coot), and the *ae'o* (stilt) (Kanahēle 1995: 129). As early as 1828 (50 years after contact), foreign visitors (Duhaut-Cilly; Chamberlain) commented on the state of decline and disrepair of the fish ponds and taro fields in Waikīkī. The French navigator, Auguste Duhaut-Cilly, attributed this decline to the missionaries who coerced the Hawaiians to spend most of their time in school reading the bible rather than working in their fields, and to the sandalwood trade. Hawaiian author, George Kanahēle, credits the deterioration of the Waikīkī fish ponds to several negative impacts: introduced diseases which decimated, not only the ponds' caretakers, but the general laborer class who maintained the ponds; and the *Māhele* which altered the land tenure system and diminished the power of the *kono'ihiki* (land manager) to control "corvée labor" (1995: 126). No doubt, all of these reasons contributed to a continual decline.

Motivated by business, in the late 1880s, Chinese farmers began leasing the ponds from Hawaiians to raise fish and ducks and the taro fields were converted to rice fields. The interim fate of Loko Ka'ohai is not known prior to the pond being filled in.

In 1911, Loko Ka'ohai was filled in by realtor, Percy Pond, to create the Beach Walk Tract. Other nearby ponds in Kālia were likewise filled when Fort DeRussy was built and when the Ala Wai Canal was dredged in the 1920s. Earl Vida, whose father supervised the construction of the Ala Wai, related that Dillingham had a dual-purpose scheme, not only to build the canal, but to fill in the ponds. "We don't need the ponds. We need the land" (Earl Vida interview, COH- UHM: 597). The filling in of the ponds (and the taro fields) had dramatic implications for future generations of Hawaiians: it forever altered the traditional landscape and it prevented Hawaiians from being able to return to this traditional way of life in Waikīkī.

An overlay of Bishop's 1881 map (see Figure 7) over the project area indicates Loko Ka'ohai was situated to the west of the current project area.

**D. Kawehewehe - a *Wahi Pana* (legendary place) of Spiritual Healing**

Kawehewehe, the older Hawaiian name for the overall area where the project is situated, is associated with a healing tradition. The waters of Kawehewehe were believed to have special healing qualities. As a treatment for illness and debility, the sick were brought here to bathe in the healing waters of the ocean. As part of the healing ritual, many might wear a *lei* woven from the *limu kala*. After bathing in the ocean, the patient ducks under the water, releasing the *lei* from around his neck, letting the *lei kala* float out to sea. Upon turning around to return to shore, the custom is to never look back, symbolizing the *'ōki* (to sever or end) and putting an end

to the illness. Leaving the *lei* in the ocean also symbolizes forgiveness (*kala*) and the leaving of anything negative behind.

Kawehewehe takes its meaning from the root word, "*welie*" which mean "to remove" (Pukui & Elbert 1986: 383). Thus, as the name implies, Kawehewehe was a traditional place where people went to be cured of all types of illnesses – both physical and spiritual. It is uncertain if the tradition of Kawehewehe as a healing place originated hundreds of years ago in Hawaiian history or whether it began after the introduction of foreign diseases and epidemics which decimated thousands of Hawaiians.

As a young child, John 'I'i, was trained to be an attendant in the courts of the *ali'i* (chiefs). He relates the story of how his relatives arrived on O'ahu, making Kawehewehe their first home.

... John Papa Ii, first appeared amongst the chiefs when but a small child, at Kawehewehe in Waikiki, Oahu. His uncle, Papa Ii, and most of their people were there at that time, for that was their first residence when the company arrived from Lahaina at the time of the coming of Kamehameha with his great *peteleu* fleet of canoes intended for the invasion of Kauai. (1959:17)

Not only was Kawehewehe a healing place, but it was also a desired place to live because it was situated close to the chiefly residences (Pua 'ali'i'i) and beloved *ali'i* whom 'I'i's family served. Perhaps the original place name of Kawehewehe first took its name from a spring in Kawehewehe Pond which might have also had healing qualities. In Hawaiian legends, many springs had healing powers. Over time, this reputation might have been expanded to include the waters fronting the beach at Kawehewehe.

Traditionally, *mo'o* (water spirits) are associated with fish ponds, springs and water resource areas which they guard and protect. *Mo'o* are known to take on more than one form (*kino lau*), many times taking on the form of a part-human or human. Often, ponds were associated with a particular named *mo'o* who was worshiped and to whom offerings were made. Kamehameha promised one of his *akua* (gods), Kihawahine, that he would build her a *hale puaniu* – a house where offerings were made with *awa* (Kamakau 1964: 85-86). There are no known legends regarding *mo'o* in relation to Loko Ka'ohai or Kawehewehe Pond.

#### E. Stream Resources

Before the Ala Wai Canal was built and the streams diverted, the streams feeding into Waikiki were once abundant in *'o'opu* and *'opae*. Bob Paoa and Kamaka Clark Miyamoto both attest that by the time they were born these two resources were no longer available. However, stories passed down by their elders and parents indicated the stream was once an important cultural resource for them. Kawehewehe Stream might have been home to the *'o'opu* and the *'opae*. Sadly, these two cultural resources are no longer found in Waikiki today.

#### F. Marine Resources

The ocean was just as important a gathering place as the land. A study of ocean resources indicated that although the entire coastline along Kālia and Waikiki was utilized for gathering and subsistence, particular spots seemed richer in certain resources than others. Generally, the

whole coastline of Waikiki was accessed because certain fish are known to frequent certain areas and an experienced fisherman knows where the holes or spots are if he wants to catch a particular fish. Where one chooses to fish might also depend on the crowds at the beach and time of day. In Waikiki, especially due to the high volume of people on the beaches, many fishermen these days go fishing at night. The more favorable fishing grounds were in front of the old Niunalu Hotel (Hilton Hawaiian Village), the Royal Hawaiian and Halekūlani, and the area fronting the Natatorium. Specifically, the area between Diamond Head and the Kapahulu Groin was considered better fishing grounds than the Outrigger Reef on the Beach/Ft. DeRussy portion of the shoreline. Likewise, the squid grounds are located between the Kapahulu groin and Diamond Head.

Oral information passed down to Bob Paoa from his elders indicated many of the people dwelling along the coast of Kālia were fishermen. The 1890 *Directory of the Kingdom* listed the names of twelve fishermen living in Kālia and six fishermen living in Kawehewehe. Three of the names listed are relatives to Bob Paoa and Kamaka Clarke Miyamoto.

Kālia was renowned for the fragrant *limu lipoa*, as well as several other varieties of seaweed such as *manaua*, *wāwae tole*, *'ele 'ele*, *kala* and some *kohu*. The area between the Royal Hawaiian and the Halekūlani was the area where *limu lipoa* was traditionally gathered.

The *'ele 'ele* existed in relation to Pi'inai'o Stream and the two other streams feeding into Waikiki. It seems this resource is no longer found in Waikiki today – especially because the streams no longer flow to the sea. *'Ele 'ele* normally grows in areas where there is freshwater intrusion, such as where freshwater streams enter the ocean (Abbott 1974: 10).

In relation to the healing waters of Kawehewehe, the *limu kala* is a traditional *lei* that many wear when performing religious ceremonies in the ocean. The *limu kala* is symbolic of "letting go" and "release" such as in the "letting go of an illness." The key word is "*kala*" which means to "forgive" or "release". The *limu kala* is also used as bait to catch the *kala* fish (Pers. Comm., Peter Akimo to K. Mc Guire 9/12/01).

The oral interviews confirmed that the Waikiki shoreline was abundant in many varieties of fish and *limu*, certain varieties of crab and lobster, as well as being good squid grounds. Talk-story with fishermen who presently use the Waikiki coast confirm, for the most part, this is still true today.

#### G. Kalo, the Staff of Life

*Kalo* or taro, from which *poi* is made, was a major food staple in the traditional Hawaiian diet. Evidence from the *Māhele* Land Commission Awards indicate that *kalo* was cultivated on *kūleana* land in Kawehewehe. Both Kawehewehe awardees indicated they maintained *lo'i* on their land. Kalaipaopao (LCA 1436) claimed two *lo'i* and Wailehua (LCA #1513) claimed 8 *lo'i*. Of particular interest is Kalaipaopao's claim to two sections of Kawehewehe Stream. Often, *kalo* was planted along the edges of streams (Handy 1940: 10).

In relation to *kalo* there are also many associated religious and cultural beliefs. In brief, *kalo* is associated with the god Kāne. There are specific rituals and prayers related to the planting of *kalo*. Hawaiians also believe they are descendants from Hāloanaka, the first *kalo* plant or the elder brother, and from Hāloa – the younger brother. There is a dual relationship between the *kalo* plant and fish in the ocean when making ritual offerings. For example, the red-stalked *kūmā*

taro might be substituted for the red kumū fish. These are only a few of the religious beliefs associated with *kalo*.

The 1890 *Directory and Handbook of the Kingdom* lists the names of twelve taro planters for the *ahupua'a* of Waikiki. One was listed for Kawehewehe and one was listed for the adjacent *ʻiʻi* of Helumoa. The planter in Kawehewehe is a relative to Bob Paoa and Kamaka Clark Miyamoto.

#### II. Summary

Traditional native Hawaiian cultural practices declined with the extensive land modification and urbanization of the greater Waikiki area. As the wetlands were drained and ponds were filled to accommodate the continuing expansion of urban Honolulu, the traditional way of life for native Hawaiians was no longer possible in Waikiki. There are therefore no on-going traditional cultural practices in the vicinity of the current project area. However, native Hawaiian burial practices were such that the potential for encountering human burials within the current project area does exist. An archaeological inventory survey with subsurface testing is therefore recommended.

#### V. RECOMMENDATIONS

Past archaeological research, from the beginning of the 20th century to the present has produced evidence that traditional Hawaiian cultural deposits, historic trash deposits, and human burials exist throughout the breadth of the Waikiki area. Soils underlying the current project area are listed as Jaucas Sand (JaC) (Foote *et al.* 1972). Soils of the Jaucas Series have been documented to contain human burials.

Recent excavations related to the Waikiki Anti-Crime Lighting Project (Busb *et al.* 2002) indicated the presence of Jaucas Sand immediately *makai* of the project area on Kalākau Ave. Four *in situ* human burials were encountered and documented within this naturally deposited beach sand matrix. A single human burial was encountered in the vicinity of the current project area on Kalākau Ave., fronting the Waikiki Beachcomber hotel (see Figure 8).

A review of the original architectural plans, for the then named Waikiki Theater, by C.W. Dickey indicated areas of possible previous disturbance of the underlying natural sediments. In the raised "court yard" area fronting the actual theater building, the plans indicated a "4" [concrete] slab on fill." The floor area in front of the screen stage area also indicated a "4" [concrete] slab on fill." In addition, the plans indicated relatively shallow (approximately 2 ft. below street level) excavations for the footings of the major structural columns around the perimeter of the main Waikiki Theater building. Generally, it appears that the majority of the Waikiki Theater structure lies upon fill land built up over the natural sediment.

Due to the likely presence of undisturbed Jaucas Sand deposits underlying the Waikiki Theater #3 project area, as well as documented human burials in the vicinity, subsurface ground disturbing activities in the project area may encounter significant historic properties including traditional Hawaiian cultural deposits, historic trash deposits, and human burials. It is therefore the recommendation of CSH that an archaeological inventory survey be completed as the next step in the historic review process.

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APPENDIX D  
Letters from the State Historic Preservation Division

LINDA LIMOLE  
GOVERNOR OF HAWAII



PETER T. YOUNG, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCES MANAGEMENT

STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION  
KACHAPERUA BUILDING, ROOM 304  
811 KAMOLELA BOULEVARD  
HONOLULU, HAWAII 96813

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
COMMISSION ON WATER RESOURCES  
MANAGEMENT  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
STATE PARKS

January 30, 2003

Mr. Eric Crispin, Acting Director  
Department of Planning and Permitting  
650 S. King Street, 7<sup>th</sup> Floor  
Honolulu, Hawaii 96813

LOG NO: 31527  
DOC NO: 0301tm09  
Architecture

ATTENTION: Geni Ung  
Dear Mr. Crispin:

SUBJECT: Chapter 6E-42, Demolition Permit for  
Waikiki Theater #3  
TMK: 2-6-002-009, Waikiki, Honolulu, Oahu

Thank you for transmitting the demolition permit of the Waikiki Theater to our office. While the theater has undergone numerous changes, there are still several items worth salvaging. We would greatly appreciate the following conditions be placed on the demolition.

1. Salvage and re-use at the site or display at the IMAX theater lobby:
  - The mural on the ceiling in the lobby can be salvaged in major parts;
  - Metal grilles on the exterior as identified at meeting with consultant (may display only one and store the rest for possible re-use at the site);
  - At least one of the Art Deco faux leather door; and
  - The organ pipes (perhaps for future use by another historic theater).
2. Also, we would greatly appreciate receiving a copy of photograph #1 of "Exhibit J" and a photograph of the interior staircase railing that leads to the projection room.

We would like to thank Consolidated Theatres and their consultants for their cooperation. Should you have further questions, please feel free to call Tonia Moy at (808)692-8030.

Aloha,

*P. Holly McEldowney*

P. Holly McEldowney, Acting Administrator  
State Historic Preservation Division

TM:jik

c: ✓ John Whalen, Plan Pacific, 345 Queen St. #802, Honolulu, HI 96813

LINDA LIMOLE  
GOVERNOR OF HAWAII



PETER T. YOUNG, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCES MANAGEMENT

DEPUTY  
DWAYNE T. W. LAU

STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION  
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AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
COMMISSION ON WATER RESOURCES  
MANAGEMENT  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
STATE PARKS

March 4, 2003

Mr. John Manavian  
Robertson Properties Group  
120 N. Robertson Blvd.  
Los Angeles, CA 90048

LOG NO: 31780  
DOC NO: 0303tm01  
Architecture

Dear Mr. Manavian:

SUBJECT: Salvage of Items  
Waikiki Theater #3  
File No. 2003/SDD-1  
TMK: 2-6-002-009, Waikiki, Oahu

We would first like to thank you and your consultants for working with our office on the salvage of various items at the Waikiki Theater #3. We appreciate your agreement to the following items.

1. Salvage of the 5 grilles for potential use in a future redevelopment.
2. Faux leather doors will also be salvaged for potential re-use.
3. The organ pipes will be carefully stored with advice from Lowell Angell, theater historian.
4. We were also disappointed about the asbestos content in the mural. Matt Gilbertson has agreed to photograph the mural before its destruction.
5. We have already received many of the photographs.

With these stipulations that you have agreed to, we concur with the salvage plan. Thank you for your continued cooperation. Should you have further questions, please feel free to call Tonia Moy at (808)692-8030.

Aloha,

*P. Holly McEldowney*

P. Holly McEldowney, Acting Administrator  
State Historic Preservation Division

TM:jik

c: Matt Gilbertson, Architects Hawaii, Inc., 1001 Bishop Street #300, Pacific Tower,  
Honolulu, Hawaii 96813  
John Whalen, Plan Pacific  
Ann Lau, DPP (fax:527-6111)



APPENDIX E  
Letter from Julian Ng, Traffic Engineer

**Julian Ng, Incorporated**

Transportation Engineering Consultant

P.O. Box 816 Kaneohe, Hawaii 96744-0816

phone: (808) 236-4325

fax: (808) 235-8869

email: jng@hawaii.rr.com

September 24, 2003

Mr. Robin Foster

Plan Pacific

345 Queen Street, Suite 802

Honolulu, Hawaii 96813

Subject: 2284 Kalakaua Retail project (TMK 2-6-22: 009, 014, and 024)

Dear Robin:

The proposed retail use is expected to generate less traffic than the former theater use of the site. This letter details the analyses that were made to arrive at this conclusion.

**Trip Generation Factors**

The traffic volumes generated by the former and proposed uses were computed from trip factors commonly used for similar uses. However, because these factors are typically from studies of similar uses in suburban areas, adjustments were made for the site's location in Waikiki. These factors, which include a trip rate for total vehicular movements at a site's driveway and a percentage representing the distribution, are shown in Table 1.

Table 1 - Trip Generation Factors

	PM Peak Hour		Saturday Peak Hour	
	trip rate	entering	trip rate	entering
Theater with matinee, per seat	0.14	53%	0.23	54%
specialty retail center	4.93	57%	5.10	57%
quality restaurant, per 1000 GSF	9.02	62%	10.82	59%
high turnover sit-down restaurant, per 1000 GSF	19.38	55%	20.00	63%

Source: Institute of Transportation Engineers, *Trip Generation, 6<sup>th</sup> Edition*.

**Traffic Estimate for Former Use**

For the former theater use, the number of vehicles generated from the factors were reduced to account for walk-in customers, estimated to be 25% during the peak hours. Since there were three theaters and show times were not concurrent, a reduction to 70% of the estimated volume was also applied. The calculation of the peak hour traffic generated by the theaters is shown in Table 2.

**Julian Ng, Incorporated**

Mr. Robin Foster

September 24, 2003

Page 2 of 3

Table 2 - Traffic Generated By Theaters

	PM Peak Hour		Saturday Peak Hour	
	Enter	Exit	Enter	Exit
900 seats (Waikiki 1)	67	59	112	95
900 seats (Waikiki 2)	67	59	112	95
1,200 seats (Waikiki 3)	89	79	149	127
Total computed	223	197	373	317
Accounting for walk-in customers	167	148	279	238
Peak Hour traffic volumes	117	104	196	167

**Traffic Estimate for Proposed Use**

The proposed use will include small shops at ground level and restaurants on the second floor and on a third floor. Traffic volumes generated by the retail use were estimated for similar sized stand-alone specialty shops. Traffic volumes generated by each second floor restaurant were estimated using factors for a "high-turnover, sit-down restaurant" while the traffic generated for the third floor restaurants were estimated using "quality restaurant" factors. Table 3 shows these calculations.

Table 3 - Traffic Generated by the Proposed Use

	PM Peak Hour		Saturday Peak Hour	
	Enter	Exit	Enter	Exit
new retail (Waikiki 1&2)	74	56	76	58
third floor restaurant	34	21	39	27
third floor restaurant	45	28	52	36
second floor restaurant	65	53	77	45
second floor restaurant	86	71	102	60
first floor retail	18	13	18	14
first floor retail	8	6	8	6
first floor retail	15	12	16	12
total site traffic	345	259	388	257
accounting for 75% walk-in	86	65	97	64

**Julian Ng, Incorporated**

Mr. Robin Foster  
September 24, 2003  
Page 3 of 3

**Summary**

The proposed uses are estimated to generate less traffic than the former use of the site by three theaters. A small reduction in traffic volumes would occur in the Weekday PM Peak Hour while volumes in the higher Saturday Peak Hour are estimated to be half of that generated by the theaters. Table 4 summarizes the comparison.


Table 4 – Comparison of Traffic Generated

	PM Peak Hour		Saturday Peak Hour	
	Enter	Exit	Enter	Exit
Former use: 3 theaters	117	104	196	167
Proposed retail & restaurants	86	65	97	64
Difference (less)	(31)	(39)	(99)	(103)

Should there be any questions, please contact me.

Sincerely,

JULIAN NG, INC.

  
Julian Ng, P. E., P.T.O.E.  
President