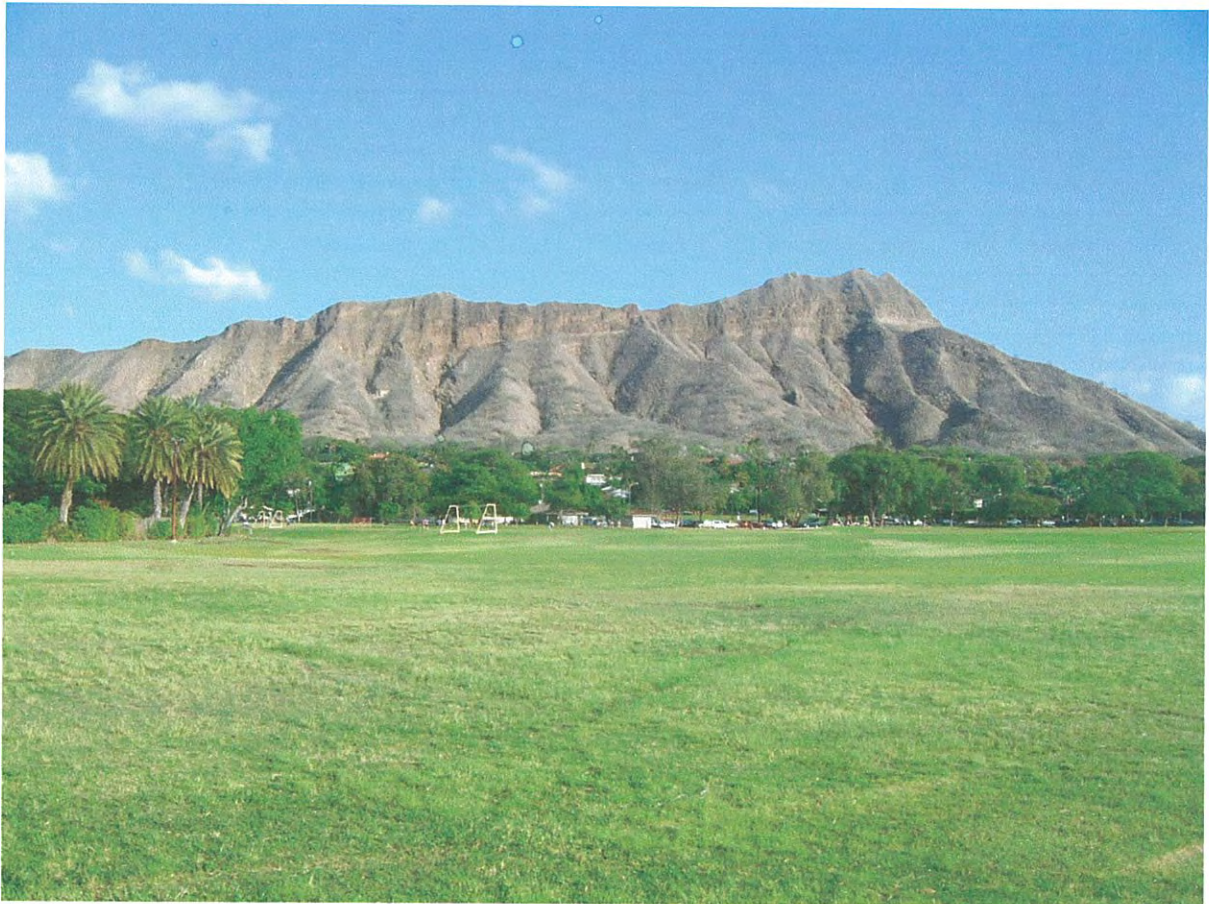


FINAL ENVIRONMENTAL ASSESSMENT

***KAPIOLANI REGIONAL PARK  
MASTER PLAN UPDATE***

Waikiki, District of Honolulu, O'ahu, Hawai'i



Prepared for

**Department of Design and Construction**  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

April 2008

FINAL ENVIRONMENTAL ASSESSMENT

***KAPIOLANI REGIONAL PARK  
MASTER PLAN UPDATE***

Waikiki, District of Honolulu, Oahu, Hawaii

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

Prepared for

**Department of Design and Construction**  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Prepared by

**Gerald Park Urban Planner**  
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Honolulu, Hawaii 96814

and

**Miyabara Associates**  
928 Bethel Street, Suite 401  
Honolulu, Hawaii 96817

April 2008

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## SUMMARY INFORMATION

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Project: Kapiolani Regional Park Master Plan Update

Proposing Agency: Department of Design and Construction  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Accepting Authority: Department of Design and Construction for  
Mayor, City and County of Honolulu

Tax Map Key: Various  
Land Area: Approximately 165.75 acres  
Land Owner: State of Hawaii (Approximately 158.104 acres)  
City and County of Honolulu (Approximately 7.65 acres)

State Land Use: Urban  
Development Plan Area: Primary Urban Center  
DP Land Use Map: Major Park and Open Space  
Zoning: P-2 General Preservation  
Special District: Diamond Head  
Special Management Area: Within Special Management Area

Cost of Improvements: \$13.5 million (Estimated 2007\$)

Need for Assessment: Hawaii Administrative Rules, Title 11,  
Chapter 200, §11-200-5(c) Use of state and  
county lands or funds

Determination: Finding of No Significant Impact

Contact Person: Terry Hildebrand  
Department of Design and Construction  
Facilities Division, Planning Branch  
City and County of Honolulu  
650 South King Street, 9<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Telephone: 768-8401

Note: Substantive revisions to the text of the Draft Environmental Assessment are shaded.

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## SECTION 1

## DESCRIPTION OF THE PROPOSED ACTION

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### **A. Introduction**

The Department of Design and Construction, City and County of Honolulu, has prepared a Master Plan Update (“Master Plan Update” or “Update”) for Kapiolani Regional Park (“Park”). The Park is located on the eastern end of Waikiki, Honolulu, Hawaii. It is bounded by Kapahulu Avenue from Kalakaua Avenue to Leahi Avenue on the north, Leahi Avenue to Noela Drive and the *mauka* Park boundary on the east to Poni Moi Road, Poni Moi Road on the south, and east Waikiki Beach on the west. A Location Map and Tax Map are shown in Figures 1 and 2.

The original and common name for the Park is Kapiolani Park (City and County Honolulu, 1983). Kapiolani Park comprises the geographic area generally described above but excluding portions of east Waikiki Beach (primarily Kapiolani and Queen’s Surf Beaches). This geographic area comprises the Kapiolani Park Trust boundary which is the area of the Park held in trust by the State of Hawaii.

The Master Plan Update and this environmental assessment use the term Kapiolani Regional Park in their respective titles. The regional boundary includes Kapiolani Park and property that was not part of the original Kapiolani Park but which the City acquired and added to the Park (such as Kapiolani and Queen’s Surf Beaches). The Kapiolani Park Trust boundary and Kapiolani Regional Park limits are shown on Figures 3 and 6.

Although situated within the Park boundary, the Honolulu Zoo and the Waikiki Shell are not included in the Master Plan Update and excluded from this environmental assessment. Master plans were previously prepared for the Honolulu Zoo (Brong, 1993) and the Waikiki Shell but are not included in this Update.

### **B. Objectives of the Kapiolani Regional Park Master Plan Update**

The Kapiolani Regional Park Master Plan Update does not propose major changes to the historical theme envisioned by the 1983 Master Plan (City and County of Honolulu) or current types of recreational use. An internally prepared “interim” master plan update was prepared in 1992 by the Department of Parks and Recreation. The “interim” master plan update was never finalized, however, it served as an interim guide to park improvements. The historic theme is still considered appropriate for the Park. This Update recommends improvements for upgrading recreation facilities and areas, enhancing the aesthetics of the Park and the neighborhood, improving circulation and parking, and complying with current regulatory requirements. The goal of the proposed improvements is to make the Park experience more “user-friendly”, safer, and accessible for all who visit and recreate at this green jewel.

### **C. Technical Characteristics**

Recommended improvements are described below and depicted in Figure 3, Kapiolani Regional Park Master Plan Update (Miyabara Associates, 2006). With the exception of the

new entrance to the Honolulu Zoo, detailed plans for the improvements have not been prepared.

## 1. Honolulu Zoo Entrance

A new entrance building is proposed for the Honolulu Zoo. The proposed single-story building will be constructed on the *makai* side of the Zoo parking lot fronting Kapahulu Avenue. Space in the 2,500 square foot structure will be allocated for ticketing operations, public restrooms, a gift shop, and rentals (for example, rental strollers and umbrellas).

The existing entrance building, which was built in 1962, will not be demolished. It is not historically significant and not listed on the State of National Registers of Historic Places. The building will be converted into a visitor center and house restroom facilities for Zoo patrons.

It has long been recognized that the existing entrance is not optimal in terms of visibility and wayfinding. The Master Plan for the Honolulu Zoo (Jones & Jones, 1984) recommended replacing the entrance to the Zoo. The need for a new entrance was again proposed in a master plan update for the Zoo (Brong, 1993) and disclosed in the environmental assessment prepared for the Honolulu Zoo Master Plan (Belt Collins, 2000). The major deviation from the Zoo master plan and subsequent updated plans is that the existing entrance building will be left in place. All previous plans recommended removing the entrance building.

The City has worked with community interest groups and individuals, and most of them recognize the need for a new entrance and the challenges faced by the City. Minor adjustments have been made to the Park master plan for the Zoo entrance and are shown in Figure 4 (Urban Works, No Date) of the Final Environmental Assessment.

The grassy, tree shaded lawn fronting the entry to the Honolulu Zoo will be redesigned to accommodate wider walkways (6 to 10 feet wide) from Kalakaua Avenue, Kapahulu Avenue, and the Zoo parking lot. Parts of the walkway will be adorned with overhead trellises. An existing information kiosk at the corner of Kalakaua and Kapahulu Avenues will be demolished. New signage will be erected in its place identifying the Honolulu Zoo and Kapiolani Regional Park.

The new entry building, walkways, and integrated signage will improve visibility of and accessibility into the Zoo.

## 2. Walkways Widening

Existing concrete walkways on the *mauka* side of Kalakaua Avenue and the Diamond Head side of Monsarrat Avenue are proposed to be widened a minimum of 8-feet for multi-use. The existing sidewalk is too narrow to accommodate more than two persons (a 3-foot wide sidewalk can only reasonably accommodate 1 person) side-by-side. Users have to veer off the walk to allow approaching users to pass. The walkway does not meet Americans with Disabilities Act (ADA) standards for outdoor recreation areas.

The final walkway design should consider its alignment and alternative paving materials. New area lighting is proposed with light fixtures matching the existing decorative standards.



### 3. Replace Softball Field

The existing softball field, commonly referred to as “Elks Field”, located near the Dillingham Fountain, is proposed to be replaced by open lawn, trees, and additional picnic areas.

### 4. Modify Existing Softball Fields

Three existing softball fields form a partial cloverleaf pattern in the central area of the Park. Field 1 should be modified by moving home plate and the right field line and Field 3 should be modified by moving the entire field. The exact adjustments needed should be determined during the design stage. No changes are proposed for Field 2. The modifications will allow portable or temporary backstops to be put into place for player and park user safety.

### 5. Accessibility Improvements

One of the objectives of the Master Plan Update is to ensure that all areas and facilities in the Park are fully accessible. This is to be accomplished by new improvements and modifying existing infrastructure to meet ADA requirements.

### 6. Bicycle and Moped Parking

Off-street parking areas for bicycles and mopeds are proposed to be placed at **four** selected locations. The parking areas consist of an approximately 400 square foot (20' X 20') paved parking surface with security racks. These areas are proposed in support of the Honolulu Bicycle Master Plan which identifies regional bike routes around the Park. These routes include existing bike paths along Kapahulu Avenue and Paki Avenue and a bicycle lane along Kalakaua Avenue.

### 7. Underground Overhead Utilities

Overhead utility systems detract from the visual quality of the Park. Although interior areas of the Park are free of overhead utilities, existing lines and poles are common along the major roadways and in some parking areas.

It is recommended that overhead utility lines along Kalakaua Avenue, Monsarrat Avenue, and Paki Avenue be routed underground. Views of the Park, Diamond Head, Waikiki Beach, and residential areas around the Park will be improved by removing the aerial clutter.

### 8. Paki Avenue Improvements

Paki Avenue is one of the important circulation and access ways within the Park. It also serves as a major regional route for vehicle traffic between Ala Wai Boulevard and Diamond Head Road. In spite of its heavy use by park users and outlying residents, it remains the only major park road in substandard condition along most of its length.

The Master Plan recommends reconstructing Paki Avenue between Poni Moi Street and Monsarrat Avenue. The travelway should be widened and clearly defined by improvements at the road edge. Raised curbs are typical, but alternative design treatments should be considered in the final design.

Parallel parking would be allowed on the *makai* side of the road and diagonal parking on the *mauka* side where feasible. Some on-street parking will be lost due to the proposed improvements and by banning illegal parking. All on-street parking areas will be clearly striped. The recommended parking arrangement aids in protecting the existing street trees and their root systems from damage.

Overhead utilities should be placed underground within the project limits.

The existing shared walkway should be 10-12 feet in width and realigned further away from the road and on-street parking where feasible and necessary. The walkway should connect with the new walkway improvements on Kalakaua and Monsarrat Avenues.

Existing trees shall remain unless they are dead, dying, or diseased in which case they should be replaced. New street trees should be planted to supplement the existing stock where space is available.

#### 9. Reconstruct Parking Lot

A small, 48-stall parking lot adjoining the Park maintenance buildings (*makai* of Paki Hale) is proposed to be reconstructed. Drainage improvements are necessary to ameliorate ground settlement in the parking lot which is creating an undulating surface and potential safety hazard.

This parking lot will be reconfigured to resolve drainage problems. The two existing detached structures---a maintenance building (with public restrooms) and a storage shed currently used by park personnel---are proposed to be demolished. A stand alone replacement comfort station is also proposed to serve Park users.

#### 10. Acquire Residential Lots

As a long-term strategy, the Master Plan Update proposes acquiring the few remaining residential lots between Paki and Leahi Avenues. Acquiring these lots would be consistent with previous Master Plan recommendations.

#### 11. Renovate Maintenance Baseyard Facility

The existing Maintenance Baseyard Facility located between Paki and Lehua Avenues near the fire station is in need of repair and renovation. The use of the facility will remain for park maintenance purposes only. The existing structure, however, particularly the exterior façade, has been cited as having possible historic significance, although it is not currently listed on the Hawaii or National Register of Historic Places and may need to be preserved or otherwise integrated into any renovation plans. It was designed by Harry Sims Bent the architect who is noted for park architecture at Ala Moana Beach Park and may become eligible for historic status.

### **D. Land Tenure**

Title to portions of Kapiolani Regional Park is held by the State of Hawaii in trust for the maintenance of a public park. By Executive Order No. 22 dated July 1, 1913, the State of Hawaii transferred operational management of the Park to the City and County of Honolulu. The Department of Parks and Recreation, City and County of Honolulu is currently

responsible for Park operations and maintenance. The Department of Enterprise Services, City and County of Honolulu, operates the Honolulu Zoo and Waikiki Shell.

Kapiolani Regional Park comprises approximately 165.75 acres including the Honolulu Zoo and Waikiki Shell. The Kapiolani Park Trustees are the members of the Honolulu City Council.

The City and County of Honolulu owns approximately 7.65 acres of the Park including Kapiolani Beach, Queen's Surf Beach and lots along Paki Avenue. The paper road extension of Leahi Avenue between Noela and Poni Moi is now city land, donated to the city by the Kapiolani Park Preservation Society.

#### **E. Economic Characteristics**

The cost for implementing the recommended improvements is estimated at \$ 13.5 million (2007\$) and will be borne by the City and County of Honolulu. Projected costs associated with the respective improvement are shown below.

Honolulu Zoo Entrance	\$ 3,000,000.00
Walkways Widening	700,000.00
Replace Elks Softball Field	150,000.00
Modify Existing Softball Fields	150,000.00
Accessibility Improvements	450,000.00
Bicycle/Moped Parking	300,000.00
Underground Utilities	5,500,000.00
Paki Avenue Improvements	1,500,000.00
Reconstruct Parking Lot	750,000.00
Acquire Residential Lots	(TBD by market appraisal)
Renovate Maintenance Baseyard Facility	<u>1,000,000.00</u>

**Total:     \$ 13,500,000.00**

There is neither a phasing schedule proposed at this time nor any funds specifically earmarked for Kapiolani Regional Park Improvements, except for the Honolulu Zoo entrance. Implementation will depend solely on available future funding and Capital Improvements Program budgeting.

#### **F. Social Characteristics**

Some recreational activities will be permanently displaced by the recommended improvements. For example, the Elks Softball Field will give way to additional open space and picnic areas and some of the open space fronting the Honolulu Zoo will give way to a new Zoo entrance. Expanding the parking lot near Paki Hale will not displace recreational uses (primarily soccer fields) in the area.

Some recreational activities will be temporarily displaced during construction. For example, the walkway along Kalakaua Avenue will be closed and a temporary walkway constructed for pedestrian use. The temporary walkway will be removed when the reconstructed walkway is reopened.

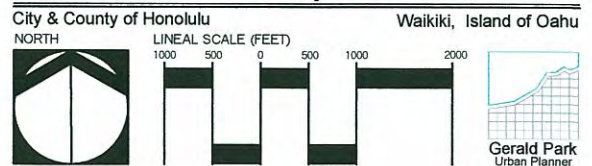


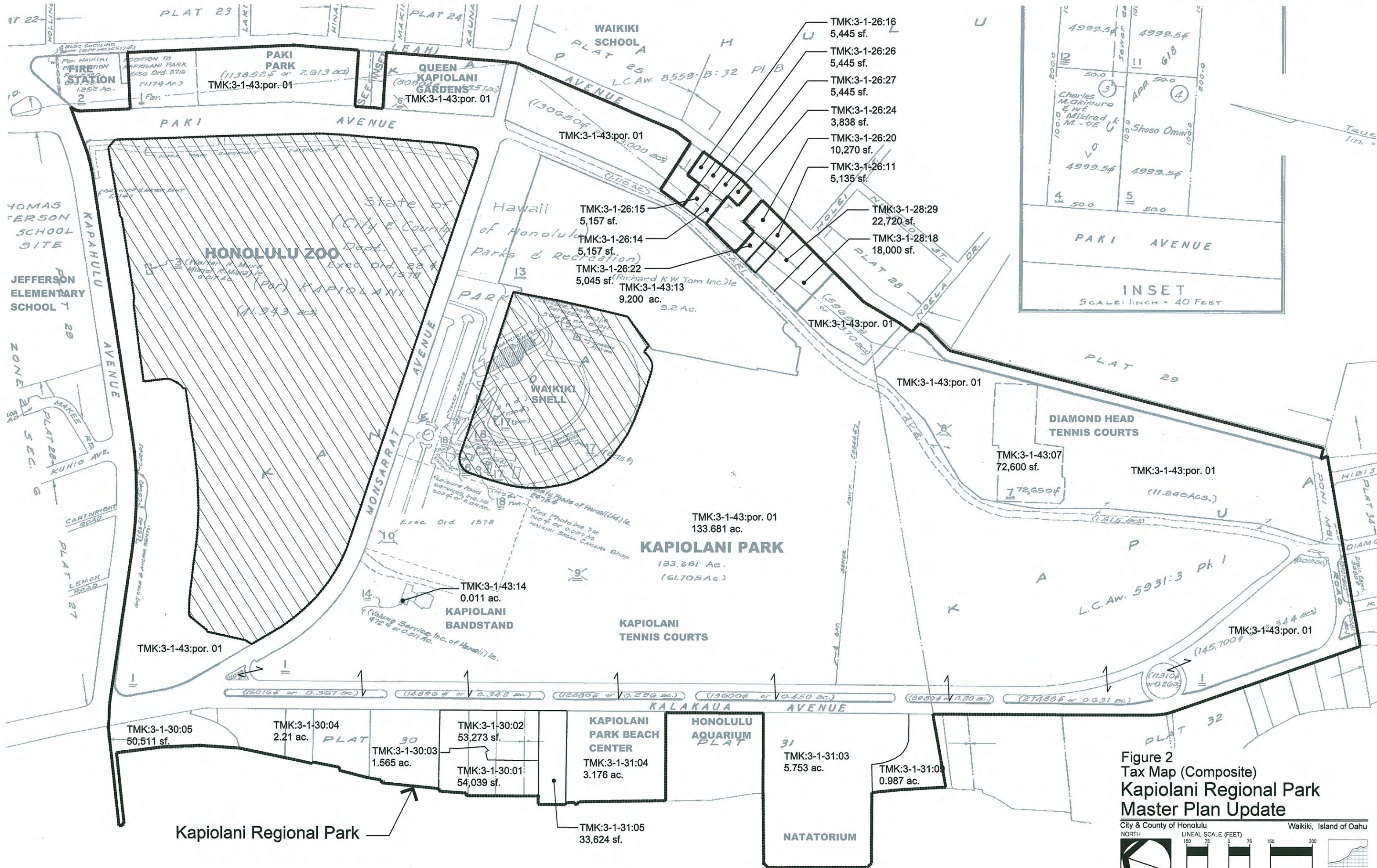
Kapiolani Regional Park



Source: USGS, Honolulu Quadrangle

Figure 1  
Location Map  
Kapiolani Regional Park  
Master Plan Update





**Figure 2**  
**Tax Map (Composite)**  
**Kapiolani Regional Park**  
**Master Plan Update**

City & County of Honolulu  
 Waikiki, Island of Oahu

NORTH

LINEAL SCALE (FEET)  
 0 75 150 300

Gerald Park  
 Urban Planner  
 January 2007

FIGURE 3  
MASTER PLAN

# KAPIOLANI REGIONAL PARK

DEPARTMENT OF DESIGN & CONSTRUCTION

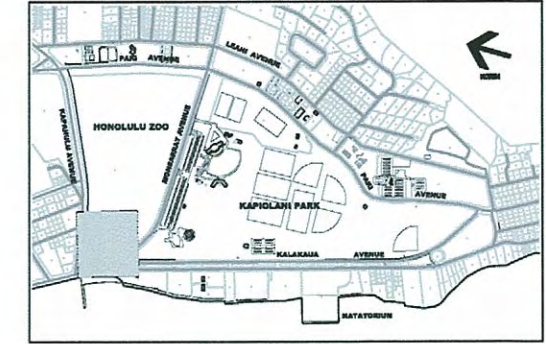
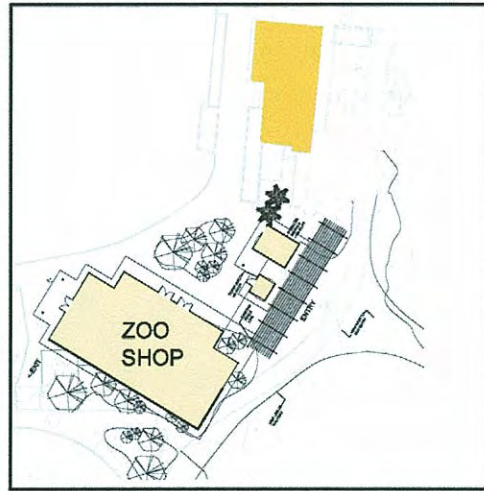
MIYABARA ASSOCIATES



NOVEMBER 30, 2006  
JANUARY, 2007  
APRIL, 2008

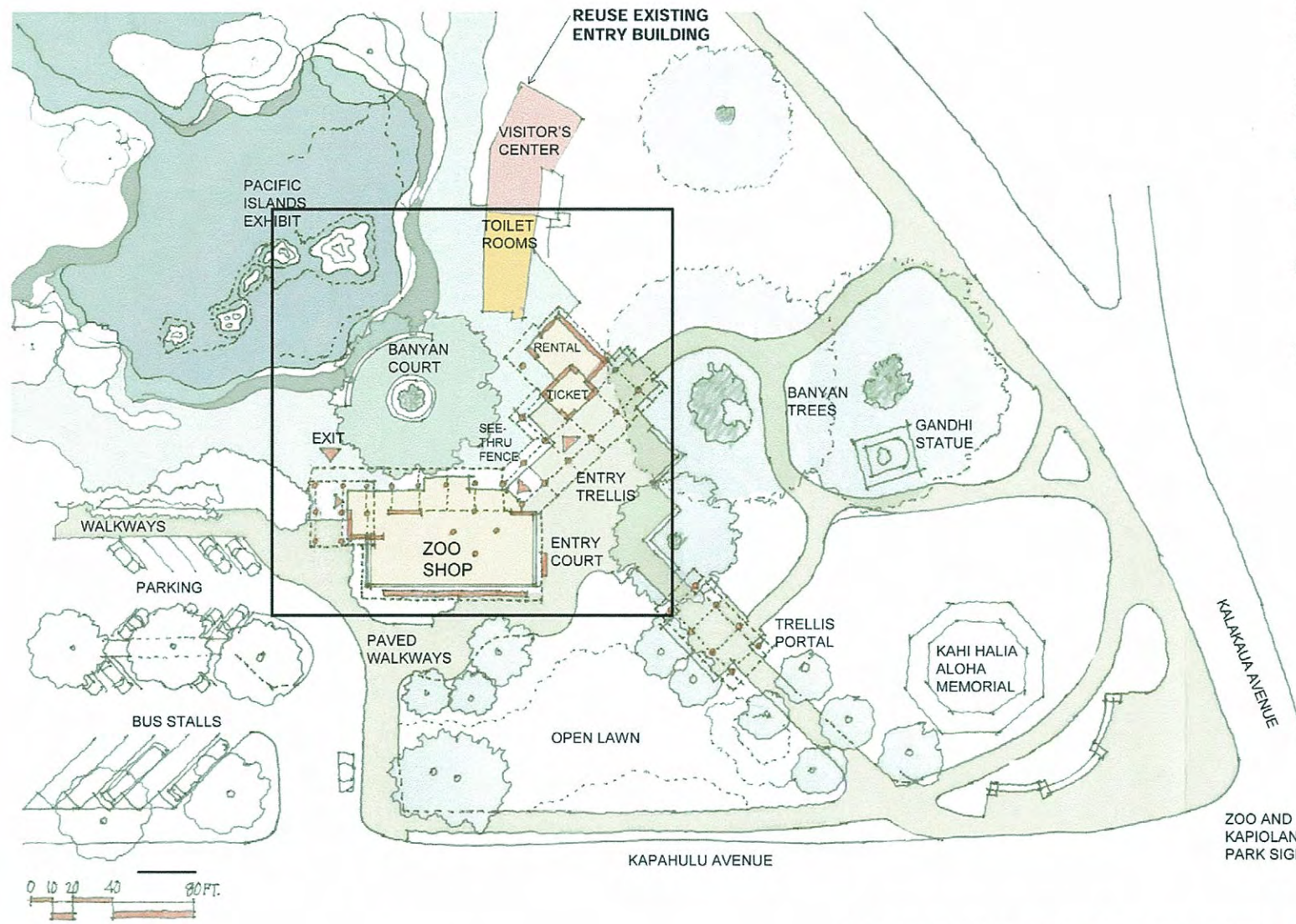
REVISION	DATE	DESCRIPTION	MADE BY	APPROVED

<b>miyabara associates</b> Landscape Architecture and Land Planning	DEPARTMENT OF DESIGN AND CONSTRUCTION CITY & COUNTY OF HONOLULU	
	<b>MASTER PLAN FOR KAPIOLANI REGIONAL PARK MASTER PLAN UPDATE</b> <small>HONOLULU, OAHU, HAWAII TAX MAP KEY 9-1-43</small>	
APPROVED:		
Director, Department of Design and Construction	Date	
CONCLUR:		
Director, Department of Parks and Recreation	Date	



**KEY MAP**  
GRAPHIC SCALE IN FEET  
0 500 1000

**UPDATED ZOO SHOP**  
SCALE - 1"=40'-0"



**REMARKS**

1. ZOO SHOP IS LOCATED ADJACENT TO THE PARKING LOT.
2. EXITING IS BY THE GIFT SHOP.
3. ENTRY COURT IS ORIENTED TOWARD KALAKAUA-KAPAHULU AVENUES.
4. FENCE ENCLOSURE PROVIDES GLIMPSES INTO THE ZOO.
5. EXISTING BANYAN TREE PROVIDES SHADE AND FOCAL POINT FOR INSIDE BANYAN COURT.
6. REUSE EXISTING ENTRY BUILDING FOR TOILET ROOMS, VISITOR CENTER, AND SUPPORT SPACES. MINIMAL ALTERATION TO FRONT FACADE.
7. REMOVE WAIKIKI INFORMATION KIOSK AND REPLACE WITH ZOO/KAPIOLANI PARK SIGN.

**FIGURE 4**  
**ZOO ENTRY IMPROVEMENTS**

- NEW ENTRANCE
- NEW ZOO SHOP
- NEW RESTROOMS
- ENTRY COURT
- REALIGNED WALKWAYS
- REMOVE EXISTING INFORMATION KIOSK
- NEW ZOO AND PARK SIGN

NOVEMBER 30, 2006  
JANUARY, 2007  
APRIL, 2008

REVISION	DATE	DESCRIPTION	MADE BY	APPROVED

**miyabara associates**  
Landscape Architecture and Land Planning

DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY & COUNTY OF HONOLULU

ZOO ENTRY IMPROVEMENTS  
FOR  
KAPIOLANI REGIONAL PARK  
MASTER PLAN UPDATE  
HONOLULU, OAHU, HAWAII  
TAX MAP KEY 3-1-43

APPROVED:	
Director, Department of Design and Construction	Date
CONCUR:	
Director, Department of Parks and Recreation	Date

**HONOLULU ZOO ENTRY  
SITE PLAN**



---

## SECTION 2 DESCRIPTION OF THE AFFECTED ENVIRONMENT

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### A. Existing Conditions

Situated on flat coastal land between the foot of Diamond Head and Waikiki Beach, Kapiolani Regional Park is one of the significant recreational and open space resources in the City and County of Honolulu. Few persons would dispute the contention that the Park is well used. On any day of the week, from dawn to dusk and into the evening, a myriad of activities take place at the Park. Be it walking, jogging, bicycling, kite flying, listening to concerts at the Waikiki Bandstand (or Waikiki Shell), playing organized sports and activities or free play, picnicking, sunbathing, swimming, sleeping under the trees, participating in cultural activities and special events (such as Sunset on the Beach), the Park is a "landscape of leisure" for residents and visitors.

The Department of Parks and Recreation ("DPR") estimates 3.0 million people recreate at or visit the Park annually.

This estimate is based in part on DPR and sponsors estimates as to the number of users (performers, participants, or spectators) at group events held during the year. Most events are scheduled on a Saturday or Sunday and in some instances, both days. In general, the events are held annually and include long and short-distance runs (e.g. the Honolulu Marathon, Val Nolasco Fun Run), charity walks and runs (Visitor Industry Charity Walk), ethnic festivals (Okinawan, Korean, Puerto Rican, Filipino), musical festivals and celebrations (Ukulele, May Day), parades (Kamehameha Day), and special events.

The Waikiki 2000 Kapiolani Park Master Design Plan (City and County of Honolulu, 1983) separated the Park into areas to facilitate the planning, design, and placement of new facilities. A brief description of each area is presented below and shown on Figure 5. Existing Park conditions are shown on Figure 6. The area references are intended only to facilitate an orderly description of the diverse areas making up the Park. The description moves in a counter clockwise direction beginning from Kapiolani Park Gateway.

#### Kapiolani Park Gateway

The corner of Kalakaua Avenue and Kapahulu Avenue is highly visible to pedestrians and motorists and the thousands of residents and visitors daily. Because of its proximity to the entrance to the Honolulu Zoo, the gateway appears to be a landscaped entry for the Zoo rather than Kapiolani Park *per se*. The area is grassed with broad canopy trees offering shade for picnicking and passive recreation.

There is an information kiosk positioned at the tip of the intersection that provides directions and information about Waikiki. Behind the kiosk, a low-rise mound surrounded by a wrought iron fence rises above the ground. Named Kāhi Hāli'a Aloha (The Place of Loving Remembrance), the feature memorializes *iwi kupuna* or human remains.

Several Exceptional Trees are planted in this area and protected by City ordinance. A statue



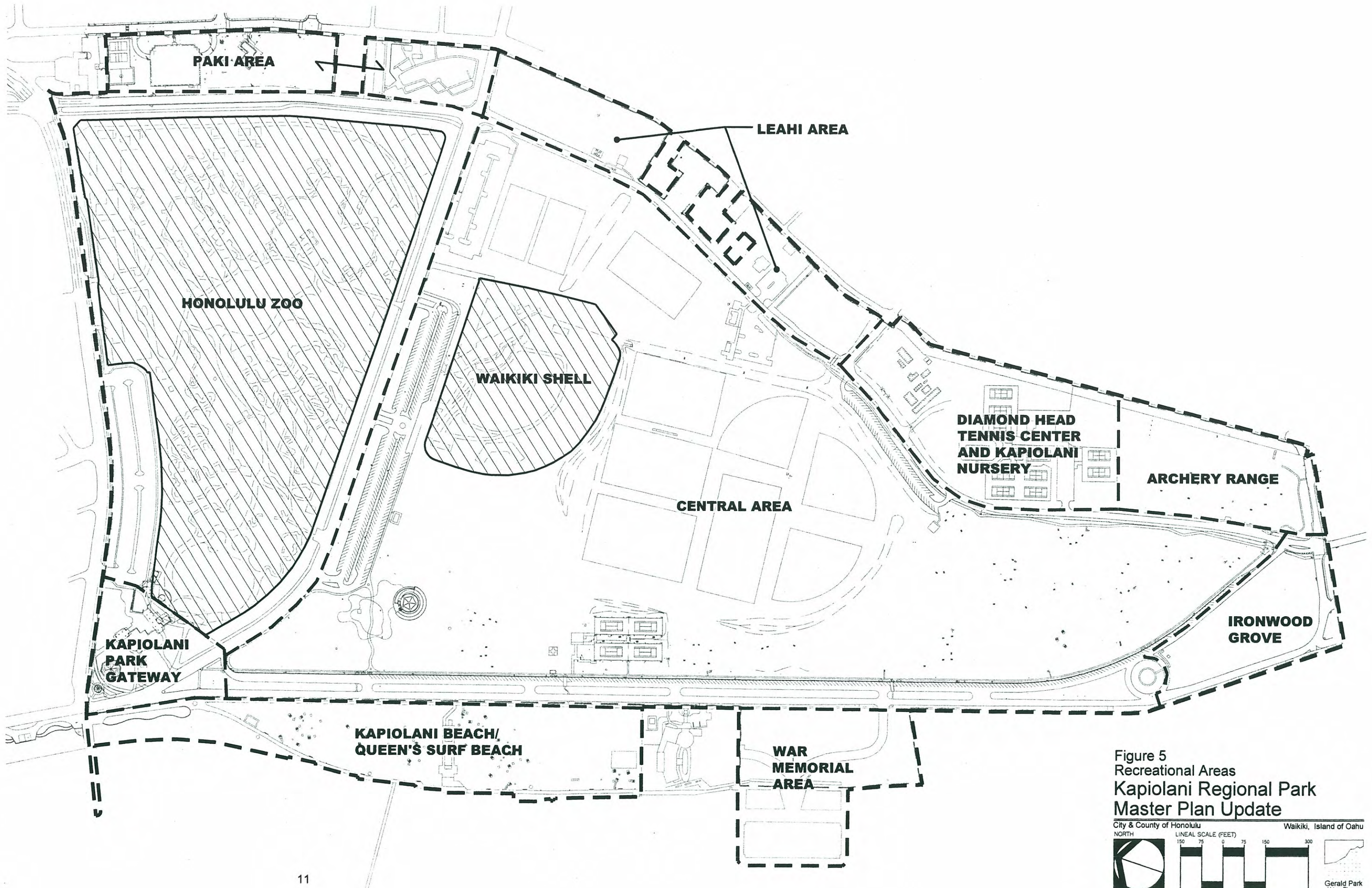


Figure 5  
 Recreational Areas  
 Kapiolani Regional Park  
 Master Plan Update

City & County of Honolulu Waikiki, Island of Oahu

NORTH

LINEAL SCALE (FEET)  
 150 75 0 75 150 300

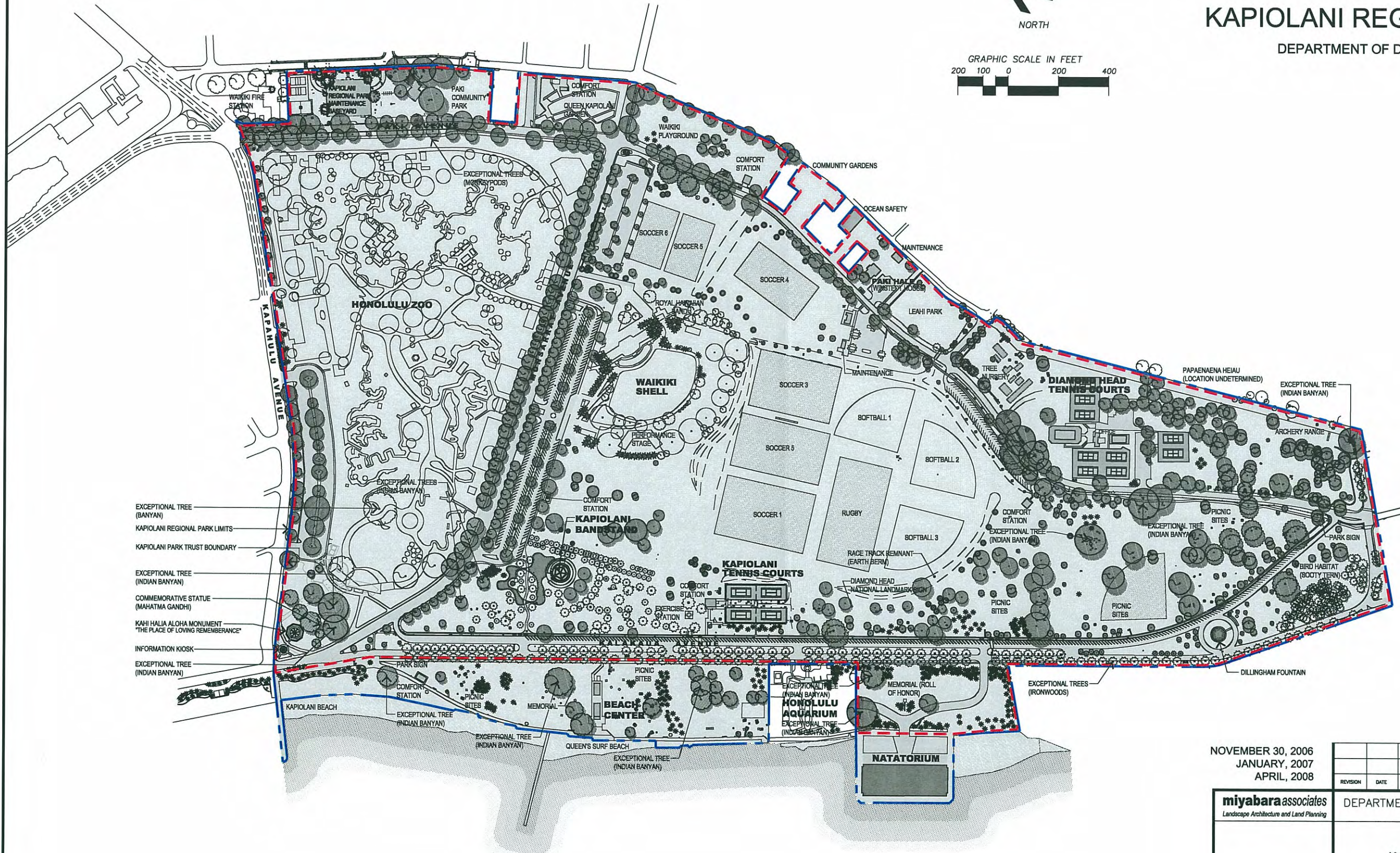
Gerald Park  
 Urban Planner

FIGURE 6  
**EXISTING CONDITIONS**

**KAPIOLANI REGIONAL PARK**

DEPARTMENT OF DESIGN & CONSTRUCTION

MIYABARA ASSOCIATES



- EXCEPTIONAL TREE (BANYAN)
- KAPIOLANI REGIONAL PARK LIMITS
- KAPIOLANI PARK TRUST BOUNDARY
- EXCEPTIONAL TREE (INDIAN BANYAN)
- COMMEMORATIVE STATUE (MAHATMA GANDHI)
- KAHU HALIA ALOHA MONUMENT "THE PLACE OF LOVING REMEMBRANCE"
- INFORMATION KIOSK
- EXCEPTIONAL TREE (INDIAN BANYAN)

NOVEMBER 30, 2006  
 JANUARY, 2007  
 APRIL, 2008

REVISION	DATE	DESCRIPTION	MADE BY	APPROVED

<b>miyabara associates</b> Landscape Architecture and Land Planning	DEPARTMENT OF DESIGN AND CONSTRUCTION CITY & COUNTY OF HONOLULU	
	<b>EXISTING CONDITIONS FOR KAPIOLANI REGIONAL PARK MASTER PLAN UPDATE</b> HONOLULU, OAHU, HAWAII TAX MAP KEY 9-1-48	
APPROVED:		
Director, Department of Design and Construction	Date	
CONCLUDE:		
Director, Department of Parks and Recreation	Date	

of Mahatma Ghandi has been erected under the spreading canopy of one of the exceptional trees.

### **Kapiolani Beach/Queen's Surf Beach**

This section of the Park is an elongated grassy expanse bounded by Kalakaua Avenue, the Pacific Ocean, Sans Souci Beach on the south, and the groin opposite Kapahulu Avenue on the north. This beachfront area is used for sunbathing, picnicking, pick-up games, and group gatherings. Facilities include a Beach Center with a snack bar and comfort station situated near the middle of the beach section. A second comfort station is sited further to the north of the Beach Center. The area is called Queen's Surf Beach in remembrance of the Old Queen's Surf (a restaurant and cocktail lounge) that was sited where the Beach Center now stands.

A wide flagstone paved promenade provides pedestrian access along the shoreline (Photograph 1). A memorial to Moses Manuwai, a former lifeguard, is located here. The grassy area between the Beach Center and the Waikiki Aquarium is used for sunbathing and passive recreational activities.



Photograph 1. Pedestrian Promenade at Kapiolani Beach.

Offshore, "Cunha's", "Public's" and "Castle's" are popular surf breaks.

Between the Waikiki Natatorium and the groin at the end of Kapahulu Avenue, the ocean up to 500 yards offshore is designated a Marine Life Conservation District ("MLCD") and managed by the Department of Land and Natural Resources. Taking of marine life in the MLCD is not permitted.

The north end is the location for "Sunset on the Beach" a popular monthly outdoor weekend function open to the public (Photograph 2). Beginning in the late afternoon, people gather here to watch a free evening movie on the beach and dine on on-site prepared local foods.



Photograph 2. Site of "Sunset on the Beach".

The Waikiki Aquarium, a State operated facility, is located in this area.

### **War Memorial Area**

The Waikiki Natatorium and a Roll of Honor Memorial mauka of the Natatorium are the principal facilities. The lawn fronting the Roll of Honor is used for picnicking and passive recreation. Adjoining the Natatorium on its south side, Sans Souci Beach offers calm waters for swimming and a sandy beach for sunbathing.

Partial restoration of the Waikiki Natatorium (primarily the entry arches and restroom facilities) was completed in 2001. The 100-meter X 36-meter saltwater pool, which was the defining feature of the Natatorium, has not yet been restored and is closed to public use.

### **Ironwood Grove**

The Ironwood Grove at the Diamond Head end of the Park is used primarily for picnicking and passive recreation activities. A grassy lawn covers about one-half of this space and ironwood trees the remaining half (Photograph 3). The ironwood trees are also a habitat for the sooty tern. The Dillingham Fountain is the major landmark in this area. A short-course exercise layout with exercise stations circles the ironwood grove.



Photograph 3. Ironwood Grove Facing Diamond Head from Dillingham Fountain.

### **Central Area**

The Central Area is the largest and most used section of the Park. The chief design feature of Kapiolani Park in the late 1880's was an oval racetrack. About half of the racetrack was located in the Central Area and the other half in the area of the present Honolulu Zoo. The outline of the original track can be seen by the changes in terrain (mounded earth) and tree layout (a line of date palms) in the Central Area. The large open area is used for organized field sports (soccer, rugby, softball, cricket, and recently lacrosse), free play, kite flying, and other non-structured activities. The Kapiolani Tennis Courts (4 lighted courts) are located near the center of the Park near Kalakaua Avenue. Trees surrounding the perimeter of the open area shade well-used picnic areas. In addition to open space for active and passive activities, the Waikiki Shell and Kapiolani Park Bandstand are major venues for entertainment and socio-cultural activities in the community.

### **Archery Range**

About one-half of the area located in the southeastern corner of the Park above Pali Avenue is set aside for an archery range (Western archery and Zen archery) and the other half for open space and picnicking. Kiawe trees provide shade for picnicking and passive activities. Groups using this area often set up nets for grass volleyball (Photograph 4).

### **Diamond Head Tennis Center and Kapiolani Nursery**

Built in the 1960's, the tennis complex features 9 tennis courts, one stadium court, and a paddle tennis court. An office and restrooms are located within a small building near the center of the complex. The courts are not lighted. The parking lot has 53 striped stalls.



Photograph 4. Open Space Area Below the Archery Range.

Kapiolani Nursery grows field stock trees, palms and other plant materials used in landscaping the Park and other City parks.

### **Leahi Area**

Waikiki Playground on the north and Leahi Park on the south bound the block between Monsarrat Avenue and Noela Way. Both parks are principally lawn areas used for passive recreation. Municipal facilities in this area include Paki Hale, Diamond Head Community Gardens, and a building housing the City's Water Safety Division.

### **Paki Area**

Queen Kapiolani Garden and Paki Community Park are the principal park features in the Paki area. Roses were once the theme at the Garden but the site was not as popular or as suitable for roses as expected. The Garden has since been transformed into a hibiscus garden. Several species of native Hawaiian plants are also on display. Facilities at the garden include a comfort station and arbor. The vine-covered arbor shades people from the glaring sun and is a popular gathering place for board games.

A grassed lawn area with a covered, low-rise pavilion (with meeting room and restrooms) identifies Paki Community Park (Photograph 5). Several large monkey pod trees provide shade and filtered light for picnicking and other passive activities. Recreation facilities include a play apparatus and swings next to the pavilion. The basketball/volleyball court at the north end of the Park is well used by players of both sports. The lawn is used for small group activities such as volleyball or *keiki* soccer practice.



Photograph 5. Lawn Area and Pavilion at Paki Community Park.

The Park Maintenance Baseyard, a one-story building, separates the lawn area on the south from basketball/volleyball courts on the north. Kapiolani Regional Park maintenance vehicles and supplies are stored in the building. Harry Sims Bent, who is noted for the park architecture at Ala Moana Beach Park, Mother Waldron Park, and Haleiwa Beach Park, designed the building.

## **B. Climate**

Abundant sunshine, persistent trade winds, relatively constant temperatures, and moderate humidity characterize Honolulu's tropical weather. Mean temperatures range from 73<sup>o</sup> Fahrenheit in the winter to 82<sup>o</sup> during the summer. Average rainfall is about 20 inches annually with most rainfall occurring between November and April. Relative humidity ranges between 56 and 72 percent.

## **C. Topography**

Although most of the Park ground appears to be flat, the terrain slopes gently from mauka to makai. Most of the interior park areas range between 6 to 7 feet in elevation. The high point is along Paki Avenue where ground elevation measures about 10 feet above mean sea level ("msl") along the length of the street. Along Kapiolani Beach, ground elevation is about 5 feet above msl.

## **D. Geology**

The geology of Kapiolani Regional Park is presumed similar to that found at Honolulu Zoo. Here, the geological formation consists of a thin layer of volcanic tuff (rock formed from volcanic ash) overlying a corraline reef consisting of calcareous reef deposits (Belt Collins Hawaii, 2003). The former is material that was ejected from the Diamond Head vent when it

blasted through existing reef deposits. Board of Water Supply borings for caprock wells in the vicinity of the Zoo encountered Diamond Head tuff overlying calcareous reef formation. The weathered volcanic tuff is approximately 6 feet thick. Soil borings taken at the Zoo encountered corraline bedrock at depths of 7 to 27 feet (Ibid).

## **E. Soils**

A Soil Conservation Service (1972) soil map (Sheet 63) identifies five soil types---Beaches(BS), Jaucus Sand (JaC), Kawaihapai clay loam (KIA), Ewa silty clay loam (EmA), and Molokai silty clay loam (MuB)---underlying Kapiolani Regional Park (and the Honolulu Zoo).

Jaucus sand is the predominant soil covering the entire Central Area, parts of the Honolulu Zoo, and portions of Kapiolani Beach. Kawaihapai clay loam underlies about half of the Honolulu Zoo. Beach Sand occurs along the ocean interfacing with Jaucus sand. Ewa soil is found primarily in the Paki Area and Molokai loam in the Leahi, Diamond Head Tennis Courts, and Archery range areas mauka of Paki Avenue.

With the exception of Beaches, the four soils are moderate to rapidly permeable; the erosion hazard from water is slight; and runoff is slow to medium. During high winds, the erosion potential for Jaucus sand is severe.

Although the Soil Conservation Service soil maps identify several existing soil types, in the late 1800's and early 1900's Waikiki was still a swamp fed by runoff and sediment carried by streams from the Koolau Mountains. Historical maps show a duck pond and *kalo land* existing in what are now the site of the Honolulu Zoo and the western portion of Kapiolani Park (Cultural Surveys Hawaii, 2003). In the late 1800's the desire to create a watery landscape for the dry parkland resulted in the "construction of a system of canals and ditches from which water was drained to create a collection of small islands and ponds (Wyeneth, 1991)." The largest of these ponds was located at the site of the current Honolulu Zoo. An island stood in the middle of the pond and was named Makee Island, after James Makee one of the founders of the Kapiolani Park Association that established Kapiolani Park. The ponds created a watery landscape in an otherwise dry and flat park (Note: the eastern half of the Park was predominantly flat land and the Park was generally dry and hot throughout the year). The ponds were used for boating and the tree lined islands, which were accessible by footbridges, were popular spots for picnicking. A small, covered bandstand (the first Kapiolani Park Bandstand) was located on Makee Island. The ponds eventually were filled in the 1920's with the construction of the Ala Wai Canal (Wyeneth, Ibid).

## **F. Hydrology**

### **1. Surface Water**

There are no natural sources of surface water present within the Park. The Pacific Ocean borders the Park on the west. The Ala Wai Canal ("Canal"), a man-made canal, is located to the north of the Park. The Canal was constructed in the 1920s to divert runoff from Makiki, Manoa, and Palolo Streams from discharging into the waters off Waikiki. Its construction eventually paved the way for transforming Waikiki from an area of marshlands to one of fastland. The 2.0 mile long Canal extends from Kapahulu Avenue on the south to



the Ala Wai Boat Harbor on the north. In 2003, the Department of Land and Natural Resources, State of Hawaii, completed a dredging project for the entire canal.

Paki Park adjoining the Waikiki Fire Station is about 1,200 LF from the Kapahulu Avenue end of the Canal; the Central Area of the Park is approximately 1/2 mile from the Canal.

## 2. Groundwater

Kapiolani Regional Park overlies the Palolo aquifer of the Honolulu Sector. The Palolo aquifer is characterized by an unconfined caprock aquifer above a confined basal aquifer in basalt. The caprock aquifer is classified as potentially useful, moderately brackish water (between 1000 and 5000 parts per million chloride) that is neither potable nor ecologically important. The basal aquifer is used for drinking water and has less than 250 parts per million chloride (Mink and Lau, 1990).

There are two artesian wells on the property. One is being used by the Honolulu Zoo and is located in Waikiki Playground at the intersection of Monsarrat, Leahi, and Paki Avenues. The other is capped and on the grounds adjacent to Paki Hale.

The Park is located within the Honolulu Water Management Area. Water management of ground and surface water in a water management area is subject to Hawaii Revised Statutes and Administrative Rules of the State Water Code.

## G. Flood Hazards

The Flood Insurance Rate Map (Panel 0125B) for this section of Waikiki places all of the Park mauka of Kalakaua Avenue in Zone X (Unshaded), which is defined as "areas determined to be outside 500 year flood plain" (Federal Emergency Management Agency, 1987). A Flood Hazard Map is shown in Figure 7.

Portions of the Park makai of Kalakaua Avenue also are delineated Zone X (Unshaded). Coastal lands are within a Flood Fringe District and subject to 100-year flooding. The coastal lands are identified as Zone AE 9' and AE 10' with the numeric indicating the base flood elevation. In general the AE 9' extends from Kapahulu Avenue to the Waikiki Natatorium and the AE 10' extends from the Waikiki Natatorium past Poni Moi Road. Between Monsarrat Avenue and the Waikiki Natatorium, part of the coastal land is designated Zone A which is an "area of 100 year flooding; base flood elevation not determined." The source of this flood designation cannot be determined but may result from overland flow from areas mauka of Kalakaua Avenue.

Although not a designated flood hazard area, several areas of the Park are prone to localized flooding following heavy rainstorms. These areas include the Waikiki half of the central area of the Park and sections of Paki Street and Kalakaua Avenue (City and County of Honolulu, 1983).

## H. Flora and Fauna

Mature Monkey Pod (*Samanea saman*), Ironwood (*Casuarina spp.*), Banyan (*Ficus sp.*), Shower Tree (*Cassia sp.*), Kiawe (*Prosopis pallida*), Date Palm (*Phoenix dactylifera*), and Coconut (*Cocos nucifera*) are commonly found throughout the Park. Common Bermuda grass (*Cynodon dactylon*) comprises the principal groundcover.

A double row of ironwood trees flanking a path comprised of crushed coral stands to the east of the Kapiolani Park Bandstand. The trees were planted as an *allee*, a term borrowed from French landscape architecture of the seventeenth century to describe a long, avenue lined by a double row of trees (Wyneth, 1991). The *allee* is about 500 feet long and is a remnant of a former carriage road or system of paths and roads that were constructed to provide access to scenic areas within the park (Ibid).

Several trees are listed as Exceptional Trees and protected by City ordinance (Article 13, Chapter 41, Revised Ordinances of Honolulu, as amended). These exceptional trees and their locations are:

- Ironwood trees planted along Kalakaua Avenue from Kapahulu Avenue to Poni Moi Road;
- Ironwood trees (grove of double row) to the east of the Kapiolani Park Bandstand;
- Indian banyan tree (total of 11):
  - 2 trees in front of Honolulu Zoo entrance;
  - directly across entrance to Honolulu Zoo, *makai* of Kalakaua Avenue;
  - ewa side of Queen's Surf Beach Center, *makai* of Kalakaua Avenue;
  - ewa side of Waikiki Aquarium, *makai* of Kalakaua Avenue;
  - 2 trees in front of the Waikiki War Memorial Natatorium;
  - 2 trees across the street from Diamond Head Tennis Court Center;
  - Diamond Head corner of archery range near entrance to La Pietra;
  - *mauka* tree across the Diamond Head side of the Honolulu Zoo *makai* side of Waikiki Shell parking lot entrance.
- Monkeypod trees planted along Paki Avenue between Monsarrat and Kapahulu Avenues.
- Makai of Shell parking entry, across Monsarrat Avenue from Zoo entry.

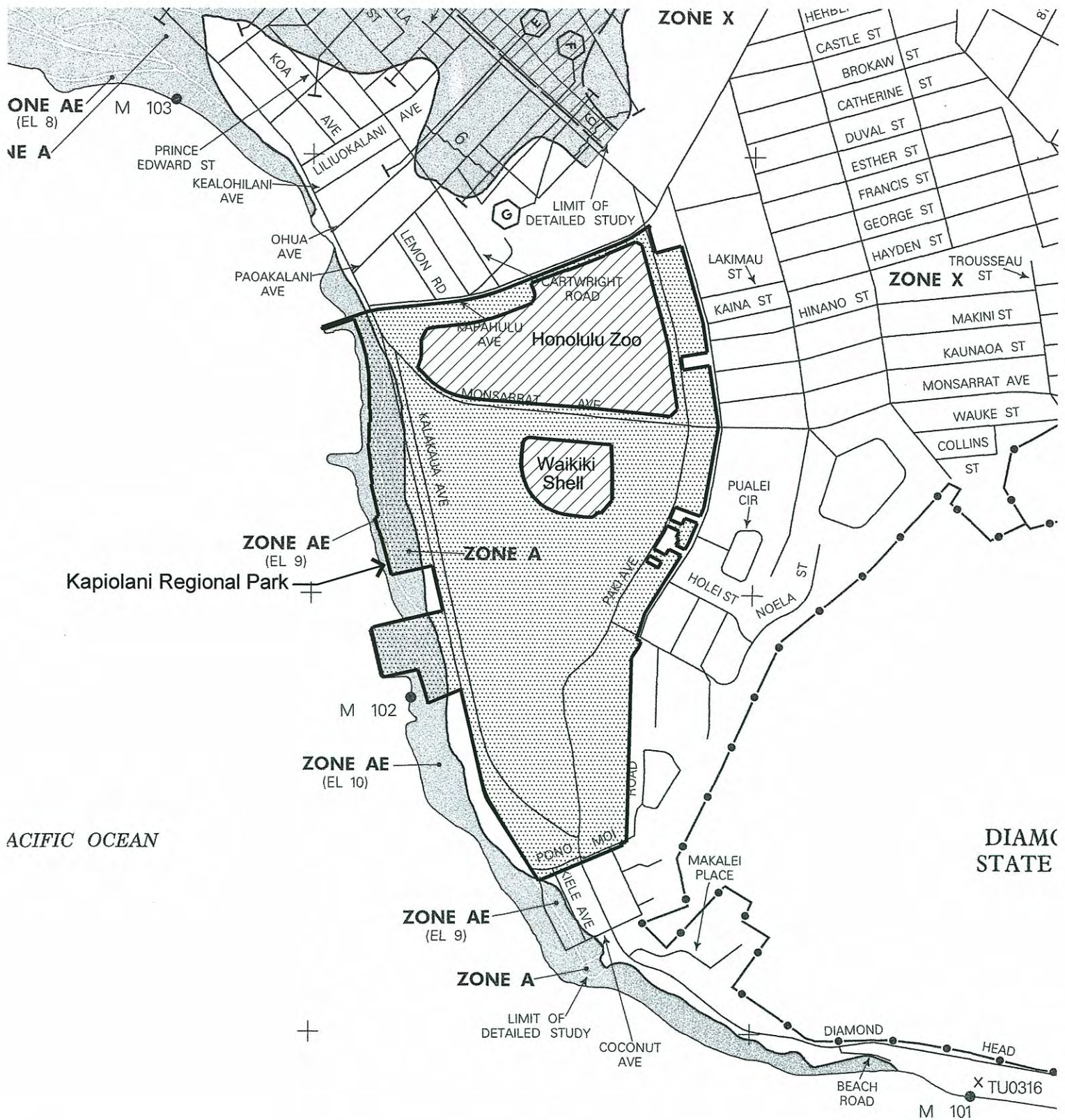
The Kapiolani Park Master Design Plan (City and County of Honolulu, 1983) recognized the remaining trees in the Park for their importance:

“The entire collection of trees is considered significant. Several specimen banyan trees, trees along Monsarrat and the numerous shower and coconut trees are important. Many trees are aging, however, and will eventually require replacement, such as the ironwoods and acacias, which are particularly brittle, and many coconuts.”

The hibiscus collection at Queen Kapiolani Garden is supplemented with native Hawaiian plants such as nehe, loulou palm, noni, a'ali'i, ke'oke'o, koki'o ko'oko'o, 'ohai, and common ornamentals including bougainvillea (*Bougainvillea spp.*), ti (*Cordyline terminalis*), and eranthemum (*Pseuderanthemum reticulatum*).

Wildlife observed on the premises was limited primarily to birds including Japanese white-eye (*Zosterops japonica*), barred dove (*Geopelia striata*), common mynah (*Acridotheres tristis*), pigeon, (house sparrow) (*Passer domesticus*), and Brazilian cardinal (*Paroaria cucullata*). The ironwood grove adjoining Poni Moi Road is frequented by the sooty tern (*Sterna fuscata oahuensis*).

The availability of water and food (either wantonly discarded or placed in trash receptacles) suggest that rodents are present. Feral dogs and cats are known to roam the grounds.



- Legend**
- Special Flood Hazard Zone Inundated by 100-Year Flood
  - Zone A No Base Flood Elevation Determined.
  - Zone AE Base Flood Elevation Determined.
  - Floodway Area in Zone AE
  - Zone X Areas Determined to be Within 500-Year with average depth of less than 1 foot.
  - Zone X Areas Determined to be Outside 500-Year Floodplain.

**Figure 7**  
**Flood Insurance Rate Map**  
**Kapiolani Regional Park**  
**Master Plan Update**

City & County of Honolulu  
 NORTH  
 LINEAL SCALE (FEET)  
 500 250 0 250 500 1000  
 Waikiki, Island of Oahu  
  
 Gerald Park  
 Urban Planner  
 January 2007

Source: Federal Emergency Management Agency  
 Flood Insurance Rate Map  
 Map Number 15003C0370F  
 Date: September 30, 2004.

## I. Historical Features

Portions of the Park are listed on the State of Hawaii Register of Historic Places (Site No. 80-14-9758) and eligible for placement on The National Register of Historic Places. The significance of the Park was summarized in the nomination papers as:

"Kapiolani Park is historically significant for its past association with indigenous Hawaiian culture and royalty. Hawaiian King Kalakaua envisioned the park as a place of recreation for all and named it after his famous Queen, Kapiolani. Since its dedication in 1877 it has been in continuous use as a location for recreational activities valued by local residents and visitors alike. It provides a sense of place to a special part of Honolulu and is identified with the world famous image of Hawaii as a recreational resort. Over the years it has been the scene of a variety of sports and leisure time activities that reflects the recreational development of Honolulu and Hawaii into the modern world."

Several structures and features that have been identified for their role in the history and development of the Park are listed below.

- Remnant of the race track oval and berm in the Central Area
- Ironwood Grove and paths at the Diamond Head end
- Ironwood trees along Kalakaua Avenue (Planted by A.S. Cleghorn)
- Ironwood trees adjoining the bandstand (Planted by A.S. Cleghorn)
- Winstedt House (Paki Hale)
- Park Service Center Building on Paki Street (Designed by Harry Sims Bent)
- Waikiki War Memorial and Natatorium
- Tennis courts along Kalakaua Avenue (First tennis courts in Hawaii)
- Transit Shelter (Reproduction)
- Honolulu Zoo

Cultural Surveys Hawaii (2000) reported that in the early 1900s Thomas Thrum identified five *heiau* as having been located at Diamond Head, at or near the present Kapiolani Park. The *heiau* are Papa'ena'ena, Kupalaha, Kapua, Kamauakapu, and Makahuna.

The remnants of Papa'ena'ena Heiau adjoin the Park. This feature is located above the Diamond Head Tennis Center and archery range on property outside of the Park. Kupalaha and Kapua were torn down and the latter two features are located closer to Diamond Head.

Although not historical in terms of age and contribution to the development of the Park, several commemorative and memorial features have been erected. These include:

- Statue of Mahatma Ghandi fronting the Honolulu Zoo
- Statue of Queen Kapiolani near the Kapiolani Park Bandstand
- Manuwai Memorial at Queen's Surf Beach
- Statue of surfer at Queen's Surf Beach
- Time Capsule near the Kapiolani Bandstand
- Diamond Head National Landmark Plaque
- Kāhi Hāil'a Aloha at Kapiolani Park Gateway

## J. Land Use Controls

State and County land use controls governing the use of the site are identified as follows:

State Land Use District:	Urban
Oahu General Plan:	Primary Urban Center
Development Plan Area:	Primary Urban Center
Development Plan Land Use Map:	Major Park and Open Space
Development Plan Public Facilities Map:	Government Building/Modification
Zoning:	P-2 General Preservation
Special District:	Diamond Head Special District
Special Management Area:	Inside Special Management Area

The respective counties control land uses in the State Land Use Urban District. Public uses and facilities (such as county parks) are a permitted principal use of the P-2 zoning district. Park use is thus consistent with zoning controls for the Park.

"The General Plan for the City and County of Honolulu is a comprehensive statement of objectives and policies which sets forth the long-range aspirations of Oahu's residents and the strategies of actions to achieve them. It is the focal point of a comprehensive planning process that addresses physical, social, economic and environmental concerns affecting the City and County of Honolulu (General Plan)."

The general plan sets forth objectives and policies in eleven functional areas that can be achieved within a 20-year time span. General plan functional areas applicable to Kapiolani Regional Park and consistent with the Master Plan Update improvements are cited below:

### III. Natural Environment

Objective B To preserve and enhance the natural monuments and scenic views of Oahu for the benefit of both residents and visitors.

Policy 2 Protect Oahu's scenic views, especially those seen from highly developed and heavily traveled areas.

### V. Transportation and Utilities

Objective A To create a transportation system which will enable people and goods to move safely, efficiently, and at a reasonable cost; serve all people, including the poor, the elderly, and the physically handicapped; and offer a variety of attractive and convenient modes of travel.

Policy 1 Develop and maintain an integrated ground-transportation system consisting of the following elements and their primary purposes:

c. Bikeways—for recreational activities and trips to work, schools, shopping centers, and community facilities; and

Policy 11 Make public, and encourage private improvements to major walkway systems.

Objective D To maintain transportation and utility systems which will help Oahu continue to be a desirable place to live and visit.

Policy 5 Require the installation of underground utility lines wherever feasible.

#### X. Culture and Recreation

Objective B. To protect Oahu's cultural, historic, architectural, and archeological resources.

Policy 1. Encourage the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.

Policy 2. Identify, and to the extent possible, preserve and restore buildings, sites, and areas of social, cultural, historic, architectural, and archaeological significance.

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

Policy 2 Develop and maintain a system of regional parks and specialized recreation facilities

Policy 6 Provide convenient access to all beaches and inland recreation areas.

Policy 12 Provide for safe and secure use of public parks, beaches, and recreation facilities.

The Primary Urban Center Development Plan ("Development Plan") does not make specific recommendations for Kapiolani Regional Park. The Development Plan classifies public parks into two types: 1) islandwide and regional parks; and 2) community-based parks. Islandwide, regional, district parks and other major open spaces are identified on the Open Space Map for the PUC. Major regional parks include Blaisdell Park, Aiea Bay State Recreation Area, Keehi Lagoon Park, Sand Island State Recreational Area, Kakaako Waterfront Park, Ala Moana Beach Park, Fort DeRussy, and Kapiolani Regional Park. Regional parks are only one of several interrelated elements both natural and man-made including streams, the mountains, the shoreline and ocean, geological landforms, and college and high school campuses that comprise Honolulu's open space system.

The Development Plan points out that "[D]ue to the shortage of parkland in densely populated neighborhoods, much of the available space in community-based parks and regional parks such as Queen Kapiolani [Kapiolani Regional Park] and Ala Moana is dedicated to facilities for intensive, active recreation (p.3-8). This often compromises aesthetic and recreational value of parks as places for quiet enjoyment of the outdoors." While acknowledging that active recreational activities are commonplace in regional parks, the planners also recommend that parks and open spaces should "[M]aintain a significant amount of open space and area dedicated to passive recreation on all park lands, especially the regional and islandwide parks (p.B2)."

A park modification (P/M) symbol for Kapiolani Regional Park is placed on the Public Infrastructure Map (PIM) for the Primary Urban Center. The improvements proposed by the Master Plan Update can be funded without amending the Public Infrastructure Map.

Kapiolani Regional Park lies within the County delineated Special Management Area (See Figure 8). According to the shoreline management ordinance of the City and County of Honolulu (Chapter 25, ROH) “no development or structure shall be constructed within the special management area without first obtaining a special management area use permit, a minor permit or being exempted pursuant to the provisions of this chapter (§25.6.1)”.

The Park is within the Diamond Head Special District (See Figure 9) and a Special District Permit (either Major or Minor) will be required for future improvements. There is a 0’ height restriction for structures in the Park (per Diamond Head Special District height regulations). The height restriction can be exempted by the Director of the Department of Planning and Permitting.

Improvements to the Park are guided by the Waikiki 2000 Kapiolani Park Master Design Plan and the Kapiolani Park Management Plan (City and County of Honolulu, 1983). The Master Design Plan recognizes the importance of Kapiolani Park as a 19<sup>th</sup> century park with distinctive buildings, landscaping, historical features, and a history that should be preserved while providing for current and future recreation needs. Towards these goals, the Master Design Plan states:

- a) The main purpose of Kapiolani Park shall remain essentially what King Kalakaua intended over 100 years ago: “A resort and place of innocent refreshment for all who wish to evade the dust of the town streets”.
- b) The continuing value of the park shall be its trees, open space, beach frontage and view of Diamond Head.
- c) The park is to remain a setting for various civic, cultural, social, recreational and sports events and activities and a place of general relaxation and rest.
- d) The overall use of the park shall be devoted to a mixture of compatible active and passive recreation uses, general use facilities, local community related uses and special purpose functions.

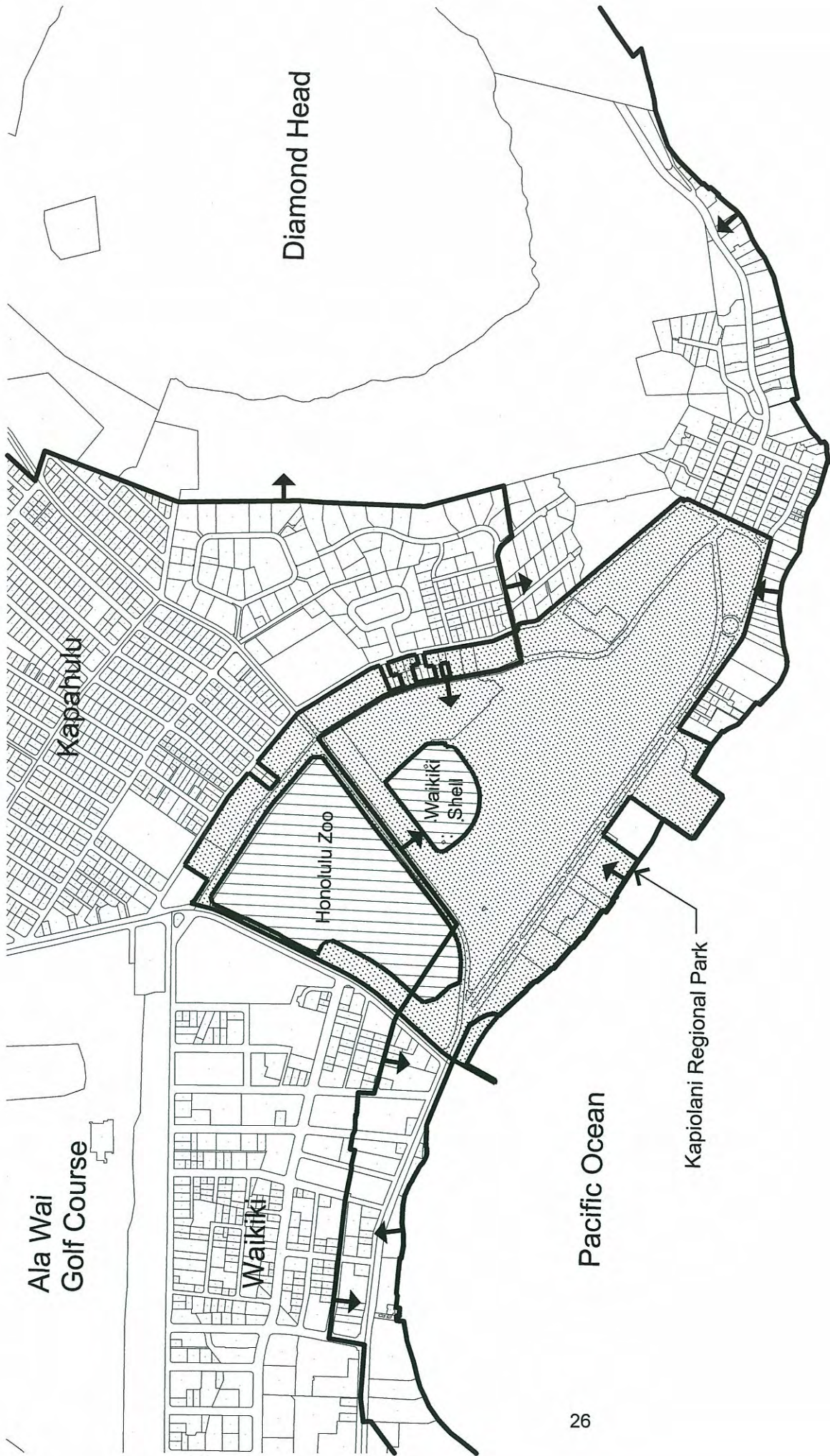
The Coastal View Study (Chu and Jones, 1987) identifies Kalakaua Avenue fronting Kapiolani Regional Park as providing continuous coastal views from the road and the Queen’s Beach area as providing important stationary views of the coast.

## **K. Public Facilities**

### **1. Streets**

Kalakaua Avenue separates most of Kapiolani Regional Park from its beach areas. This two-lane park road in north and south directions lies within a 100-foot right-of-way. The two travel lanes are separated by a median landscaped with ironwood trees. One traffic lane is southbound to Poni Moi Road and the other is northbound to Monsarrat Avenue. Unmetered parallel parking is allowed in the southbound direction. Diagonal parking is metered on the northbound lane fronting Kapiolani Park between the hours of 10:00 AM to 6:00 PM. All other times parking is free. The posted speed limit through the Park is 25 mph. Six openings in the median provide access between north and southbound lanes.

Monsarrat Avenue separates the Honolulu Zoo and Kapiolani Regional Park. This one-way eastbound roadway lies within a 60-foot right-of-way between Kalakaua and Paki Avenues.



**Figure 8**  
**Special Management Area**  
**Kapiolani Regional Park**  
**Master Plan Update**

**LEGEND**

 Special Management Area Boundary

Source: City & County of Honolulu Online GIS Database

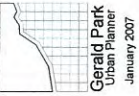
City & County of Honolulu  
 NORTH



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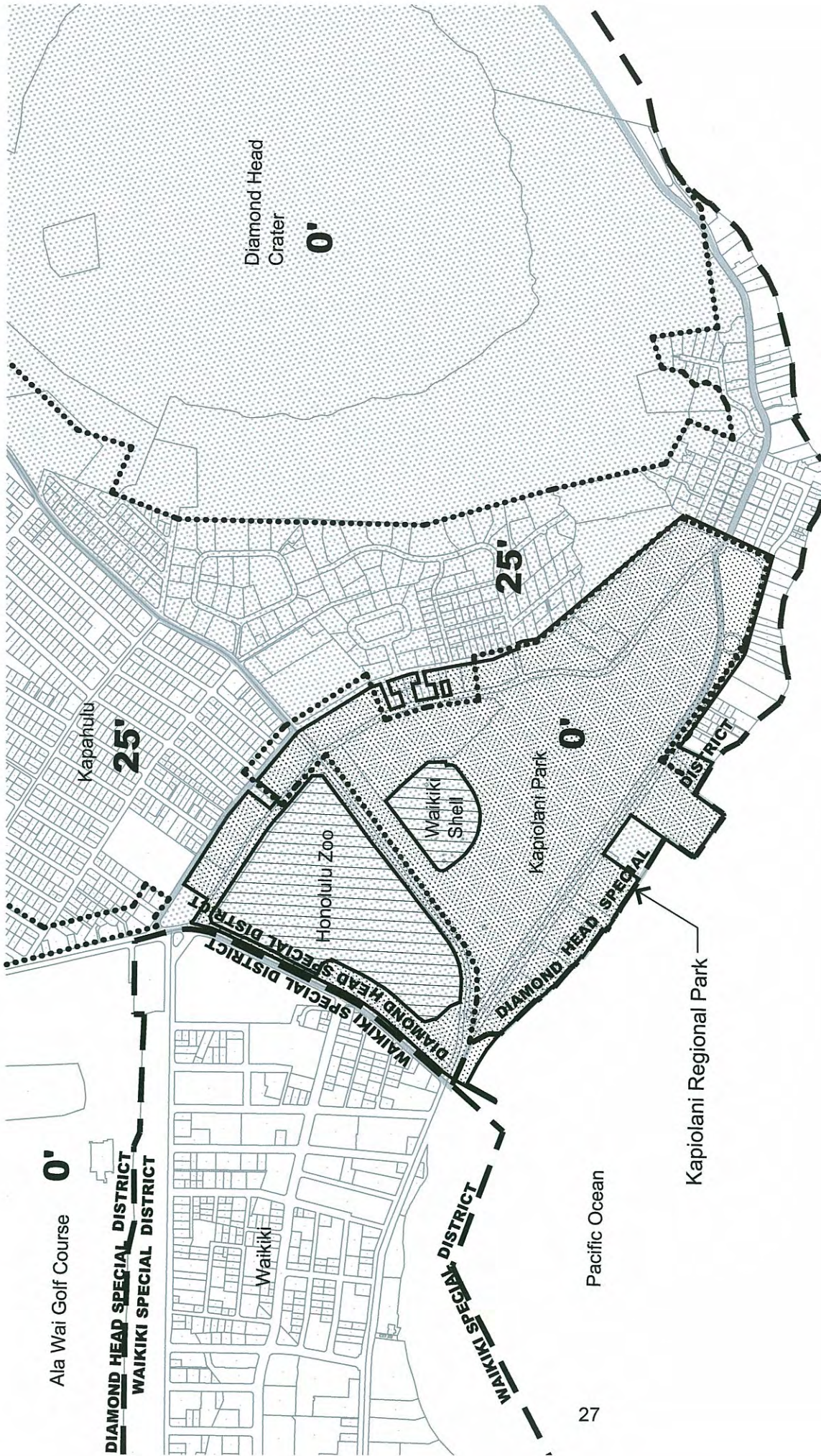


Waikiki, Island of Oahu



Gerald Park  
 Urban Planner  
 January 2007





**Figure 9**  
**Waikiki and Diamond Head**  
**Special Districts**  
**Kapiolani Regional Park**  
**Master Plan Update**

City & County of Honolulu  
 NORTH

LINEAL SCALE (FEET)  
 500 250 0 250 500 1000

Waikiki, Island of Oahu

Gerald Park  
 Urban Planner  
 January 2007

- LEGEND**
- — — — —** WAIKIKI & DIAMOND HEAD SPECIAL DISTRICT BOUNDARY
  - .....** HEIGHT LIMITATION
  - ▨** CORE AREA

Source: City & County of Honolulu, Land Use Ordinance, April 2003

The street is striped for two traffic lanes. On-street parking is permitted at signed locations on both sides of the road. TheBus, the local municipal transit system, uses the *makai* end of Monsarrat Avenue as a bus driver's break and stopping point.

Paki Avenue varies in dimension along its length. Between Kapahulu and Monsarrat Avenues, it features three traffic lanes (2 northbound, 1 southbound) and is fully improved with curbs, gutters, and sidewalk. Between Poni Moi Road and Monsarrat Avenue, the road features two traffic lanes (for two-way travel) and is in substandard condition.

Located at the south end of the Park, Poni Moi Road provides access to residential areas at the foot of Diamond Head and above the Park. Below its intersection with Diamond Head Road, Poni Moi is a two-lane, one-way (eastbound) street. Above its intersection with Diamond Head Road, Poni Moi is a two-lane, two-way street serving residential areas and a private school at the base of Diamond Head. On-street parking is not permitted.

The Park is highly accessible by bicycle as bicycle Lanes, bicycle paths, and shared lanes are found on Kalakaua, Monsarrat, and Paki Avenues. Kapiolani Park is a major component of the *Lei of Parks* cycling system linking the City's major regional parks and attractions along the south shore including: Diamond Head, Ala Moana Park, Kakaako Waterfront Park, and Aloha Tower. The system would loop around the University of Hawaii at Manoa and Downtown Honolulu thus completing the *Lei of Parks* (Department of Transportation Services, 1999).

## 2. Parking

An inventory of the parking spaces within Kapiolani Regional Park and in adjacent public areas was taken to determine the number of existing parking stalls available for Park users including visitors to the Honolulu Zoo (Belt Collins Hawaii, 2000). The inventory included a compilation of the number of spaces in the various parking areas within the area defined by Kapahulu Avenue, Kalakaua Avenue, Poni Moi Road, and Paki Avenue. The survey included public off-street parking areas, marked on-street parking (metered and non-metered), and an estimate of the number of unmarked parking stalls.

The location of on and off-street parking areas and stall counts are shown in Figure 10.

## 3. Water

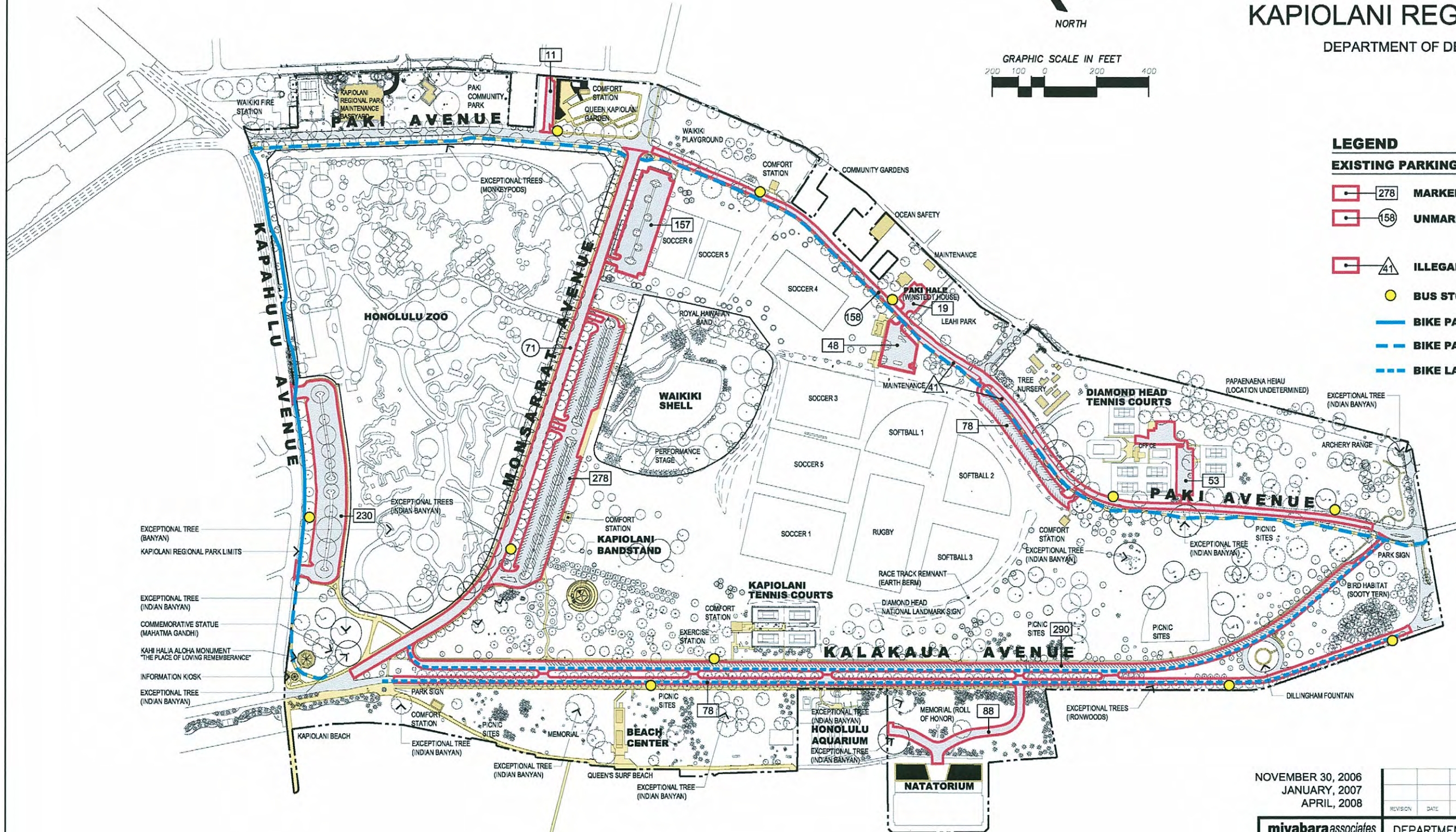
Potable water service is provided by the Board of Water Supply system. Water is available through an 8-inch line in Kalakaua Avenue, a 6-inch line in Monsarrat Avenue, and a 12-inch line in Paki Avenue.

## 4. Wastewater

Wastewater collection is provided by municipal sewer system. Sewer lines of varying size are located within street rights-of-way with the exception of Paki Avenue between Poni Moi Road and Noela Drive which is not sewerred. Wastewater from the residential areas along Paki Avenue flows into a manhole at Noela Drive. From the manhole, an 8-inch wastewater line crosses Kapiolani Park and ties into a sewer line along Kalalakau Avenue.

FIGURE 10  
**EXISTING CIRCULATION AND PARKING**  
**KAPIOLANI REGIONAL PARK**

DEPARTMENT OF DESIGN & CONSTRUCTION  
 MIYABARA ASSOCIATES



**LEGEND**

**EXISTING PARKING \***

	<b>MARKED STALLS</b>	<b>1,330</b>
	<b>UNMARKED STALLS</b>	<b>229</b>
<b>TOTAL:</b>		<b>1,559 STALLS</b>
	<b>ILLEGAL STALLS</b>	<b>41</b>
	<b>BUS STOP</b>	
	<b>BIKE PATH</b>	
	<b>BIKE PATH (SHARED)</b>	
	<b>BIKE LANE (STRIPED)</b>	

- EXCEPTIONAL TREE (BANYAN)
- KAPIOLANI REGIONAL PARK LIMITS
- EXCEPTIONAL TREE (INDIAN BANYAN)
- COMMEMORATIVE STATUE (MAHATMA GANDHI)
- KAHI HALIA ALOHA MONUMENT "THE PLACE OF LOVING REMEMBRANCE"
- INFORMATION KIOSK
- EXCEPTIONAL TREE (INDIAN BANYAN)

\* EXISTING PARKING BASED ON HONOLULU ZOO/ KAPIOLANI REGIONAL PARK - PARKING STUDY. BY: BELT COLLINS HAWAII, LTD. AND JULIAN NG, INC., FEBRUARY 2000.

NOVEMBER 30, 2006  
 JANUARY, 2007  
 APRIL, 2008

<b>miyabaraassociates</b> Landscape Architecture and Land Planning		DEPARTMENT OF DESIGN AND CONSTRUCTION CITY & COUNTY OF HONOLULU	
		EXISTING CIRCULATION AND PARKING FOR KAPIOLANI REGIONAL PARK MASTER PLAN UPDATE	
		HONOLULU, OAHU, HAWAII TAX MAP KEY: 3-1-43	
APPROVED:			
Director, Department of Design and Construction		Date	
CONCUR:			
Director, Department of Parks and Recreation		Date	

A 10-inch gravity sewer is the principal waste water line along Kalakaua Avenue. Waste water from this line discharges into the Public Baths Wastewater Pump Station and is pumped through a 12-inch force main to the Beach Walk Wastewater Pump Station. From the Beach Walk Wastewater Pump Station, wastewater is pumped by force main to the Sand Island Wastewater Treatment Plant for treatment and disposal.

#### 5. Power and Communication

Power and communication systems are strung on overhead lines along the streets adjoining the Park. Interior areas of the Park are free of overhead utility lines.

#### **L. Public Services**

Police protection originates from the Honolulu Police Department Waikiki substation located on Kalakaua Avenue at Kuhio Beach. The substation is within 5 minutes walking distance from the Park.

Fire protection originates from the Waikiki Fire Station located at the corner of Kapahulu and Paki Avenues adjacent to the Park. Response time to emergencies and fire calls at the Park is estimated at less than 5 minutes.

The Department of Parks and Recreation, City and County of Honolulu, is responsible for maintaining almost all of the grounds, structures and facilities that make up the Park and for managing uses and community functions held at the Park.

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## SECTION 3

## SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS AND MEASURES TO MITIGATE ADVERSE EFFECTS

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### A. Assessment Process

The scope of the project was discussed with the consulting landscape architect and staff of the Department of Design and Construction and Department of Parks and Recreation. State and County agencies were contacted for information relative to their discipline. Time was spent in the field noting site conditions and conditions in the vicinity of Kapiolani Regional Park. The Master Plan was presented to the Kapiolani Park Preservation Society and the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board. The sum total of consultations and field investigations helped to identify existing conditions and features that could affect or be affected by proposed improvements. These influencing conditions include:

- Kapiolani Regional Park has provided active and passive recreational opportunities for residents and visitors of the City and County of Honolulu (also the Kingdom of Hawaii and the Territory of Hawaii) since 1877;
- No rare, threatened, or endangered flora or fauna are found on the premises;
- Exceptional Trees in the Park are protected by City Ordinance;
- Kapiolani Regional Park is not located within a flood hazard area;
- There are no natural streams or ponds on the premises;
- Paki Avenue between Monsarrat Avenue and Poni Moi Street is in substandard condition;
- Water, wastewater, and utility systems are adequate to accommodate the proposed improvements;
- Kapiolani Park is held in a charitable trust established in 1892;
- The Kapiolani Park Trustees are the members of the Honolulu City Council; and
- The day to day operations and maintenance of Kapiolani Regional Park is managed by the City and County of Honolulu; and

The recommended improvements are proposed at a public park that already has been repeatedly altered by the construction of park facilities, roads, and utility systems dating back to 1877. The existing layout of the field areas, park facilities, picnic areas, off-street parking, and comfort stations and the millions of people who use the Park annually contribute to the current condition of the Park. Thus it should be acknowledged that the recommended improvements are not proposed in a pristine environmental setting. The urbanization of “the People’s Park” started in 1877 and continues to this day.

Many of the recommended improvements are not major projects. Each will generate short-term construction related impacts but the impacts are judged to be non-significant. Long-term impacts are expected to be beneficial rather than adverse. Recommended improvements which are identified as small-scale include Walkway Widening, Accessibility Improvements, Softball Field Modifications, Bicycle and Moped Parking, and Parking Lot Reconstruction.

Several improvements are suggestive of being major undertakings if gauged by their cost. Technically, these projects can be built rather easily using current construction technologies. Each will generate short-term impacts that could have deleterious effects if construction is not completed in a timely manner. When finished, however, these projects would be a significant improvement over existing conditions. These large-scale improvements are the New Zoo Entry, Placing Utilities Underground, and Paki Avenue Improvements.

The City can choose to group several improvements and undertake them collectively or treat improvements as individual projects. Construction related impacts associated with similar improvement generally are expected to be repeated for each improvement. Some improvements will have a prolonged construction period which will stretch out the duration of environmental impacts (for example improvements to Paki Avenue) while others can be built in a relatively short period of time with minimal impact (for example building bicycle and moped parking areas), little environmental impact (for example modifying the existing softball fields) or no impact (for example replacing Elks softball field).

## **B. Short-Term Impacts**

### **1. Site Work**

Site work will probably be the construction activity most disruptive on the environment. This activity entails grubbing and grading the different sites to receive the proposed improvements. With the exception of placing utility lines underground and reconstructing Paki Avenue, site work for the other improvements should not result in significant adverse impacts. Relatively small areas are to be graded for fixed construction sites and the contractor can control the amount of exposed area for non-stationary sites (walkways).

Site work for Paki Avenue, underground utility lines, and the Zoo entry will require demolition of pavements, trenching (or directional drilling) for utility lines, soil stockpiling, material stockpiling, removing existing utility poles, and installing new poles for street lighting.

Site work will expose soil thus creating opportunities for runoff and erosion. Grading will be performed in accordance with erosion control ordinances of the City and County of Honolulu and approved grading plans. Best Management Practices (BMPS) for erosion and drainage control during construction will be prepared for review and approval by the Department of Planning and Permitting.

An NPDES permit for storm water runoff associated with construction activities will be required because more than one acre of the total land area will be disturbed during construction. Any discharges related to project construction or operation activities shall comply with applicable State Water Quality Standards as specified in Hawaii Administrative Rules, Chapter 11-54 (Department of Health Comment, April 2006).

The presence of a high water table may require dewatering for work extending below the water table. If dewatering is needed, water and solids will be pumped into on-site detention basins and allowed to evaporate. Dried material will transported off-site for disposal. An NPDES Permit will be required from the State Department of Health for any dewatering activity pursuant to Chapter 54, Hawaii Administrative Rules.

## 2. Air Quality

Site work is a persistent source of fugitive dust. Site contractors are aware that dust is a nuisance to both workers and people living, working, and in this instance recreating near to work sites and it is imperative for them to maintain stringent dust controls. Frequent water sprinkling is probably the most effective dust control measure given the type and scale of proposed improvements. The contractor, however, may choose to implement other measures based on their experience with similar projects and job sites.

The contractor will be responsible for general housekeeping of job sites and for keeping adjacent areas free of mud, sediment, and construction litter and debris. Pollution control measures will comply with Chapter 60.1, Air Pollution Control, Administrative Rules, State Department of Health.

## 3. Noise

Construction noise is an unavoidable impact. Exposure to noise, however, is expected to vary in volume, frequency, and duration. Noise also will vary by construction phase, the duration of each phase, and the type of equipment used during the different phases. Noise will be most audible during site work when heavy equipment is used for moving (or removing) earth, demolishing pavements, and excavating for footings/foundations, and utility lines. Many of the non-major improvements can be built rather quickly and should not result in adverse acoustical impacts. Building the new walkways will take time but because construction progresses along an alignment, construction noise will be temporary at any one location.

Aside from the new entry building into the Zoo, no buildings will be constructed. Once the building foundation, exterior walls, and roof are completed construction noise generally will be confined to inside the structure. The exterior walls and roof should aid in noise attenuation. Although construction is localized to one area of the Zoo, noise may interfere with visitor enjoyment of the Zoo. It is anticipated that localized construction, dense vegetation, exhibit cages, and Zoo structures will aid in noise attenuation inside the Zoo grounds.

Noise will be audible beyond the Park boundaries. Nearby residents can expect a temporary degradation in the quality of the acoustical environment when the large-scale improvements are under construction. Construction related noise will be temporary at any one location as overhead utilities are placed underground and installation progresses along the affected roadway. This same condition applies to improvements to Paki Avenue as it progresses from one end of the Park to the other.

Maximum permissible daytime noise levels for the Class A zoning district (which includes lands zoned preservation) set by the State Department of Health is 55 dBA measured within the zoning district and at or beyond the property line. Construction work may temporarily exceed this standard and, per Administrative Rules (Chapter 46) of the Department of Health, the Contractor will obtain a Variance from Pollution Controls permit prior to construction. Construction will be limited to between the hours of 7:00 a.m. to 3:30 p.m., Mondays through Fridays.

#### 4. Archaeology and Historic Resources

Should subsurface archaeological features be unearthed, work in the immediate area will cease and preservation authorities notified for investigation and proper disposition of the finds.

Kapiolani Regional Park is listed on the Hawaii Register of Historic Places. The State Historic Preservation Division must undertake a historic site review and give clearance for the proposed improvements prior to construction.

The existing Honolulu Zoo Entrance Building, which will not be demolished, is not a registered historic structure.

#### 5. Flora and Fauna

Most existing trees will not be affected by the proposed improvements unless they are dead, dying, or diseased. If in any of these conditions, they will be removed.

Street improvements and the underground routing of utilities on Paki Avenue should be studied to avoid damage to trees and their root systems. As much as possible, improvements should be routed around existing trees and their major root systems. *Walkway widening also may result in potential impacts on tree roots where walkways are proposed. Since the extent of tree root systems are not known at this time, a certified arborist will be retained to recommend measures for root pruning and for protecting root systems in areas where improvements are proposed.*

*Walkway widening also may result in potential impacts on tree roots where walkways are proposed. A certified arborist will be retained to recommend measures for root pruning and for protecting tree root systems.*

#### 6. Circulation and Parking

Construction work on Kalakaua Avenue, Monsarrat Avenue, and Paki Avenue are required for the improvements planned for the respective roadway. The Department of Design and Construction or the general contractor will prepare a traffic control plan. The traffic control plan will be submitted to the Department of Planning and Permitting for review and approval. Measures for mitigating construction-related traffic impacts may include, but are not limited to:

- Posting notices alerting residents and motorists of scheduled road work.
- Posting warning signs on both sides of the work area to alert motorists of construction and to slow traffic speed.
- Posting flagmen for traffic control.
- Positioning traffic cones or other directional devices in the roadway to guide vehicles around work areas.
- Keeping at least one traffic lane open at all times to minimize inconvenience to motorists.
- Coordinating road work with lot owners whose driveways access onto the affected streets.
- Limiting construction in road rights-of-way to the hours between 8:30 AM and 3:30 PM, Monday through Friday.



- Covering open trenches with steel plates during non-working hours and posting

Road work on Paki Avenue could occasionally limit vehicle circulation to local traffic only. Motorists will be advised to use alternative routes and traffic will be diverted onto other streets. Motorists can expect delays under these working conditions.

Construction vehicles hauling workers and material will contribute to traffic on Kalakaua Avenue, Kapahulu Avenue, Monsarrat Avenue, Paki and Leahi Avenues, and Ala Wai Boulevard. This impact cannot be avoided.

Material deliveries will be scheduled during non-peak traffic hours to minimize impacts on local traffic. Construction material will be off-loaded and stockpiled on-site; however, should materials need to be unloaded within the road right-of-way, flagmen will be posted for traffic control. When this occurs, traffic delays can be expected, but should not last for more than a few minutes.

## 7. Recreation and Public Safety

Park areas near construction sites will be fenced and closed temporarily. For example areas adjacent to the new Zoo entry will be fenced. The contractor, in coordination with the Department of Parks and Recreation, will determine how large an area is to be closed. Existing walkways (or temporary walkways) will guide visitors to the entrance (perhaps the existing entry) and away from the construction site. Fencing and barricades will be posted around all construction sites to promote public safety.

Lesser measures may be taken for the small scale improvements. Conversely, stricter measures may be implemented for construction of the large-scale improvements. The objective is to ensure public health, safety, and welfare both during construction and when construction ceases for the day.

### C. Long-Term Impacts

The proposed improvements should not result in significant adverse effects. The recommended improvements will not alter the historic character of the Park and the current vision for the Park.

In total, the proposed improvements should enhance the overall recreational enjoyment of the Park and promote user safety. Access and walkway improvements will link all areas of the Park and provide a venue for walkers, joggers, and cyclists. Improvements to Paki Avenue would create a safe street environment for motorists, bicyclists, pedestrians, joggers, and park users in general. Modifying the parking on Paki Avenue should improve vehicle circulation, eliminate illegal parking, help to protect trees, and foster vehicle and pedestrian safety. Existing conditions and future conditions with sidewalk widening improvements and Paki Avenue improvements are illustrated in Figures 11 and 12.

There are many diagonal parking stalls presently along Kalakaua Avenue that require traffic to slow or come to a stop as vehicles back out. Although an exceptional condition for public parking on this island, it is legal, and experience has not shown it to be a problem. Vehicular traffic is thus compelled to maintain a slow rate of speed while traversing this street.

Picnic sites and areas for informal play will be created; additional off-street parking will reduce on-street parking and congested road conditions especially along Paki Avenue; and bicycle and moped parking will be provided.

The proposed improvements will not affect known historic resources, botanical and biological resources, ocean waters and coastal ecosystems, and freshwater bodies.

The Master Plan Update does not resolve public concerns about the lack of available parking. Modifying on-street parking along Paki Avenue (providing parallel parking on the *makai* side and diagonal parking on the *mauka* side) and installing curbing to prevent illegal parking will result in the loss of some on-street parking areas.

The Master Plan Update proposes reconfiguring and reconstructing the parking area *makai* of Paki Hale to resolve drainage problems. The area of paved coverage will not be increased or expanded. The number of stalls that the new parking could accommodate will depend on the design and may be more than currently exists. The number may or may not replace the number of stalls lost through the Paki Avenue Improvement project, but in any case will not add to the overall park total.

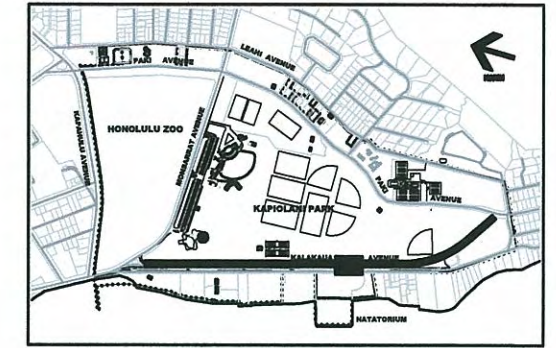
The proposed improvements will not place additional demands on water and wastewater systems because facilities requiring water and sewer service are not proposed. Energy demand should not increase because new lighting facilities are not proposed and new fixtures would replace existing fixtures in kind. The use of energy efficient street light fixtures could reduce the demand for electrical energy.

Coastal areas *makai* of Kalakaua Avenue are in a Flood Hazard area but lands *mauka* of Kalakaua Avenue are not. All of the proposed improvements are not located in a flood hazard zone and, when completed, should not contribute to an increase in flood height.

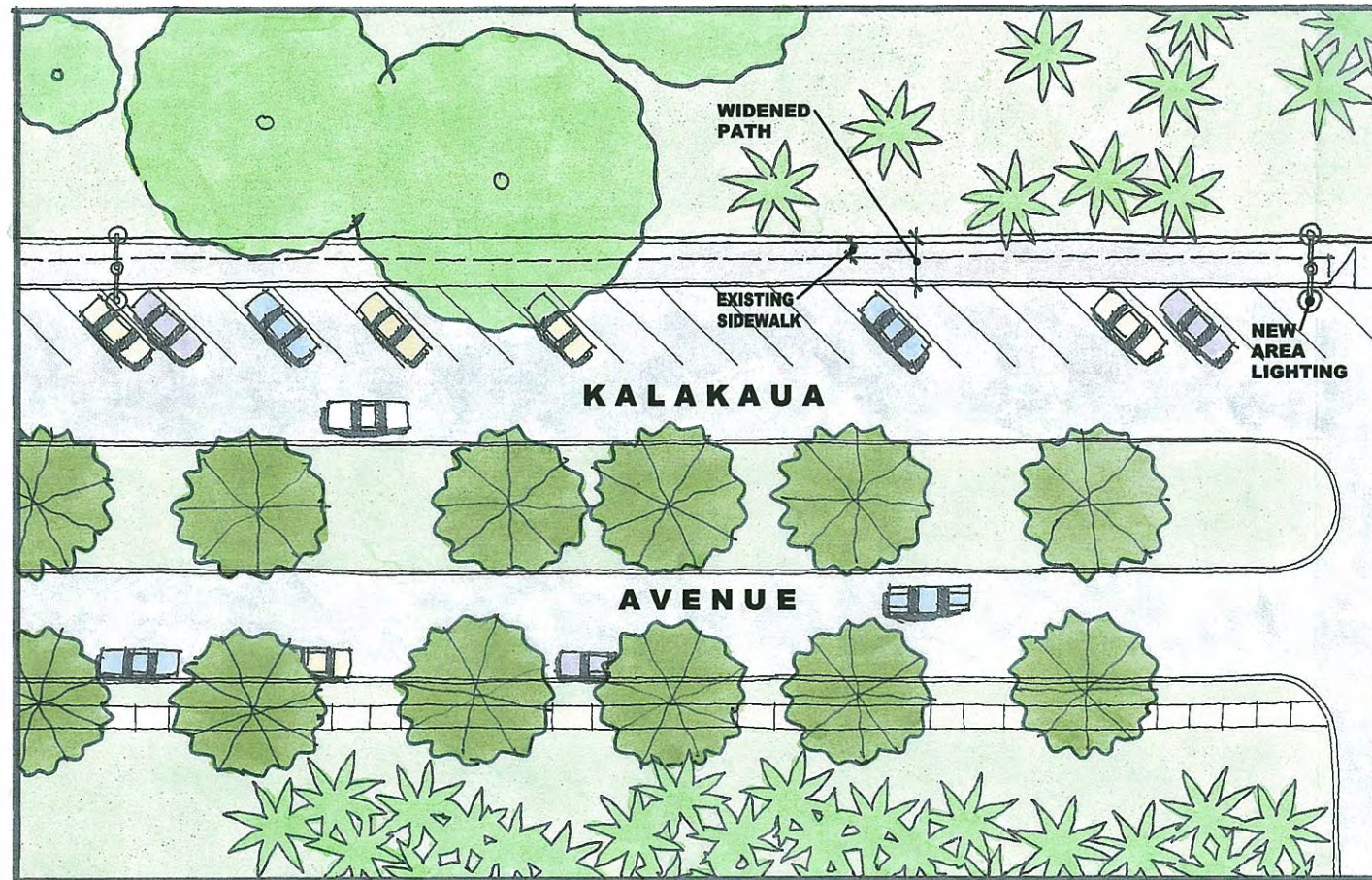
Storm runoff will be detained on-site as much as possible and allowed to percolate into the ground. The current City and County of Honolulu policy on storm water runoff is to reduce the pollution associated with storm water runoff from new development. In lieu of a drainage plan and to comply with City storm water quality policies, storm water would be directed to open space areas for percolation into the ground and evaporation or temporarily stored in on-site detention systems with controlled release to the municipal drainage system. Other methods may be implemented pursuant to approved, site-specific Best Management Practices and criteria in Part II Water Quality Criteria, City Rules Relating to Storm Drainage Standards (Department of Planning and Permitting, 2000).

The proposed improvements are public uses and structures and allowed in the P-2 zoning district. The improvements are not in violation of any provisions of City zoning controls and development standards for Kapiolani Regional Park. Construction of the new Zoo entry will exceed the 0' height limitation for the Diamond Head Special District. A Request for Waiver to the height limitation will be applied for as part of a Diamond Head Special District Permit.

Important coastal views will not be affected by the proposed improvements. Routing utilities underground will remove overhead lines from view and improve views of Diamond Head, Waikiki Beach, and Kapiolani Regional Park. The new Zoo entry will obstruct views of the ocean from one or two parking aisles at the Zoo parking lot.



**KEY MAP**  
GRAPHIC SCALE IN FEET  
0 200 400 600 800 1000



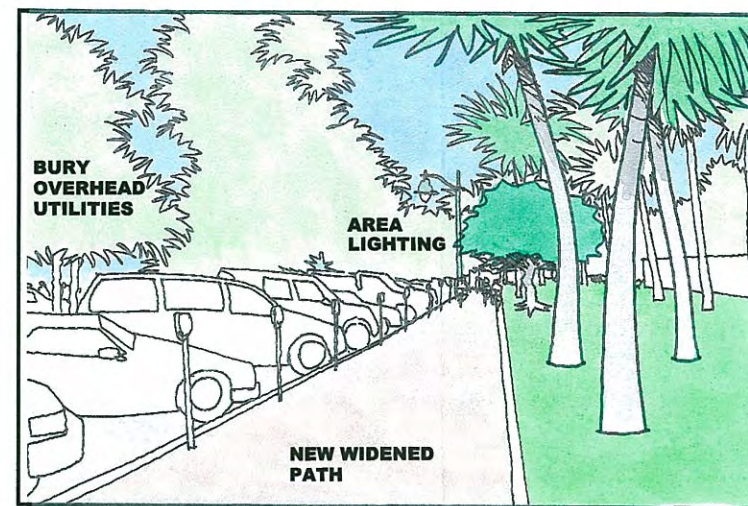
**PATHWAY WIDENING - TYPICAL IMPROVEMENTS (KALAKAU AVE)**  
APPROXIMATE SCALE - 1"=20'-0"

**FIGURE 11**  
**SIDEWALK - WIDENING IMPROVEMENTS**

- REPLACE EXISTING WALK WITH WIDENED PATH
- RELOCATE OVERHEAD UTILITY LINES UNDERGROUND
- SUPPLEMENT EXISTING LANDSCAPE
- ADD PARK STANDARD LIGHTS



**EXISTING CONDITIONS**  
NOT TO SCALE

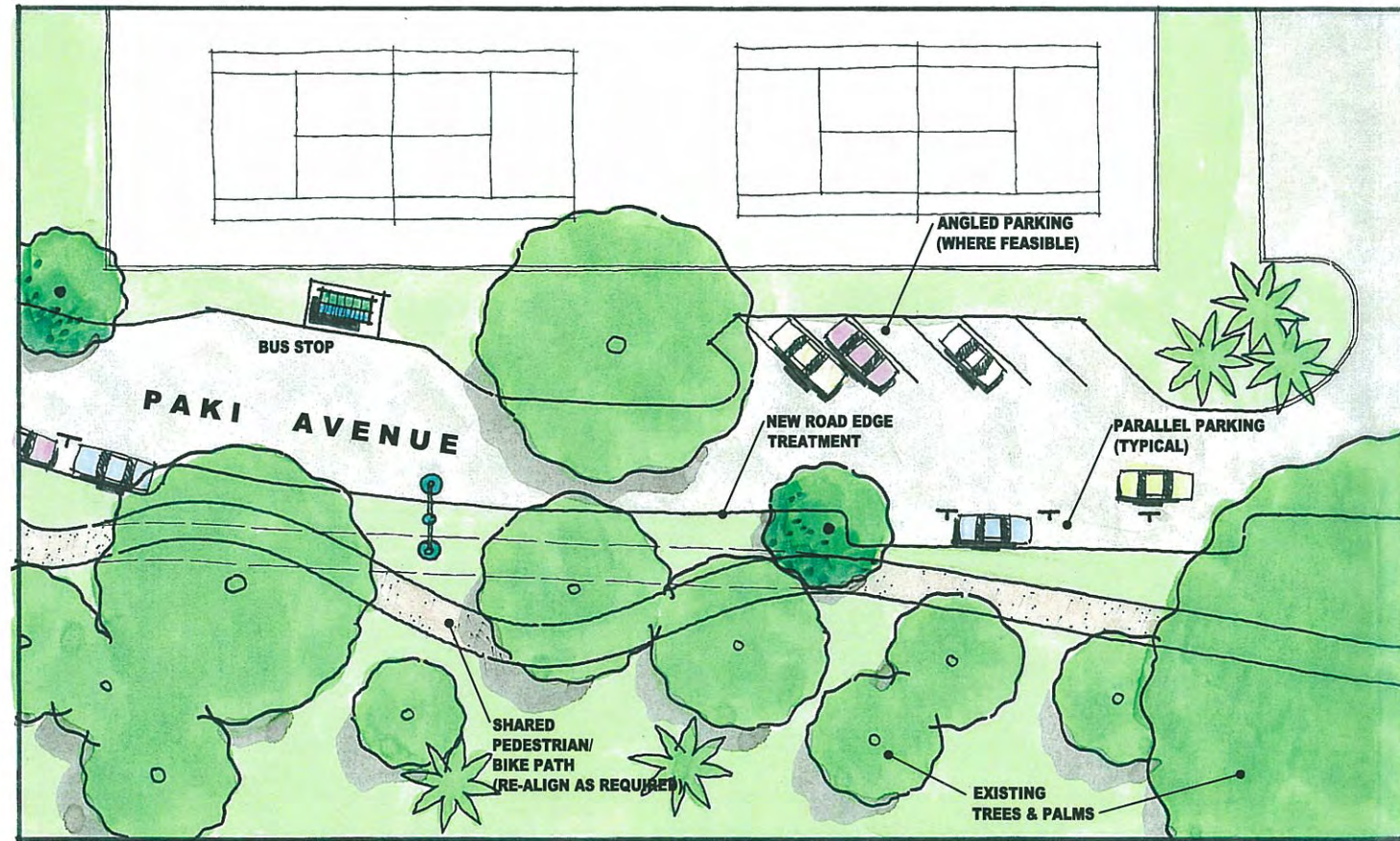


**PROPOSED IMPROVEMENTS**  
NOT TO SCALE

REVISION	DATE	DESCRIPTION	MADE BY	APPROVED

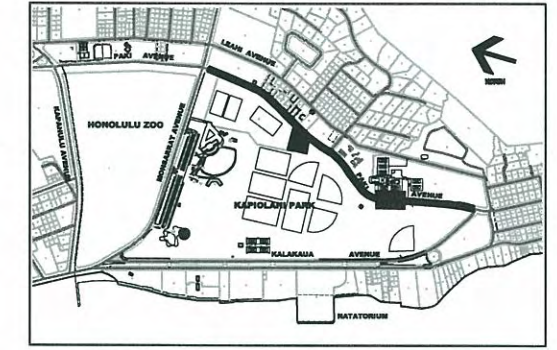
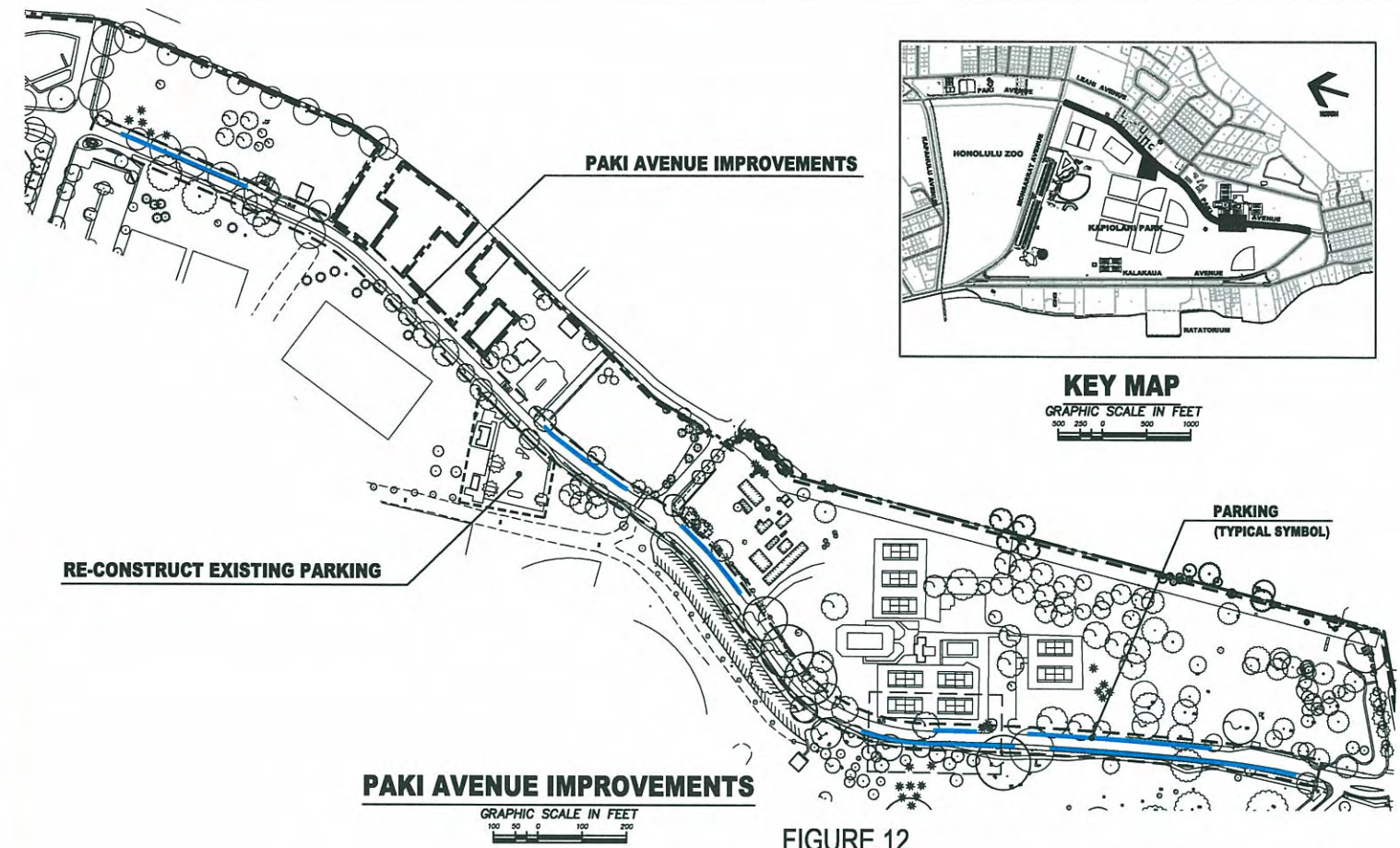
DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY & COUNTY OF HONOLULU  
**SIDEWALK-WIDENING IMPROVEMENTS**  
FOR  
**KAPIOLANI REGIONAL PARK**  
MASTER PLAN UPDATE  
HONOLULU, OAHU, HAWAII  
TAX MAP KEY 9-1-48

APPROVED:  
Director, Department of Design and Construction Date  
CONCUR:  
Director, Department of Parks and Recreation Date



**PAKI AVENUE - TYPICAL IMPROVEMENTS**

APPROXIMATE SCALE - 1"=20'-0"



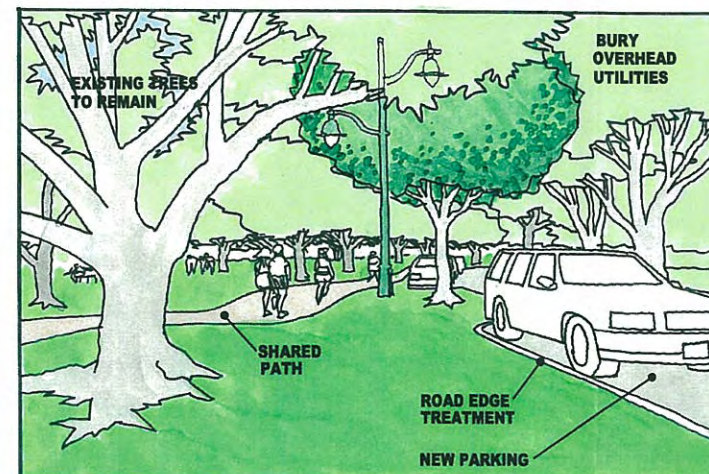
**KEY MAP**  
GRAPHIC SCALE IN FEET  
0 200 400 600 800 1000

**FIGURE 12**  
**PAKI AVENUE IMPROVEMENTS**

- BURY OVERHEAD UTILITY LINES (REMOVE POLES)
- ROADWAY IMPROVEMENTS (PAVEMENT AND EDGE TREATMENT)
- PROTECT EXISTING TREES
- PROVIDE PARKING
- ADD STREET TREES
- RE-CONSTRUCT EXISTING PARKING
- DEMOLISH EXISTING STRUCTURES
- DRAINAGE IMPROVEMENTS
- RE-CONSTRUCT PARKING AREA (50-60 STALLS)
- REPLACE EXISTING COMFORT STATION



**EXISTING CONDITIONS**  
NOT TO SCALE

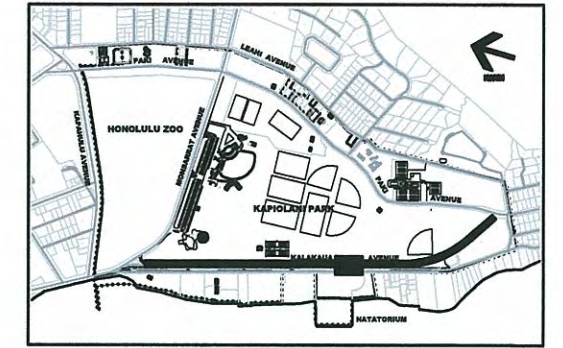


**PROPOSED IMPROVEMENTS**  
NOT TO SCALE

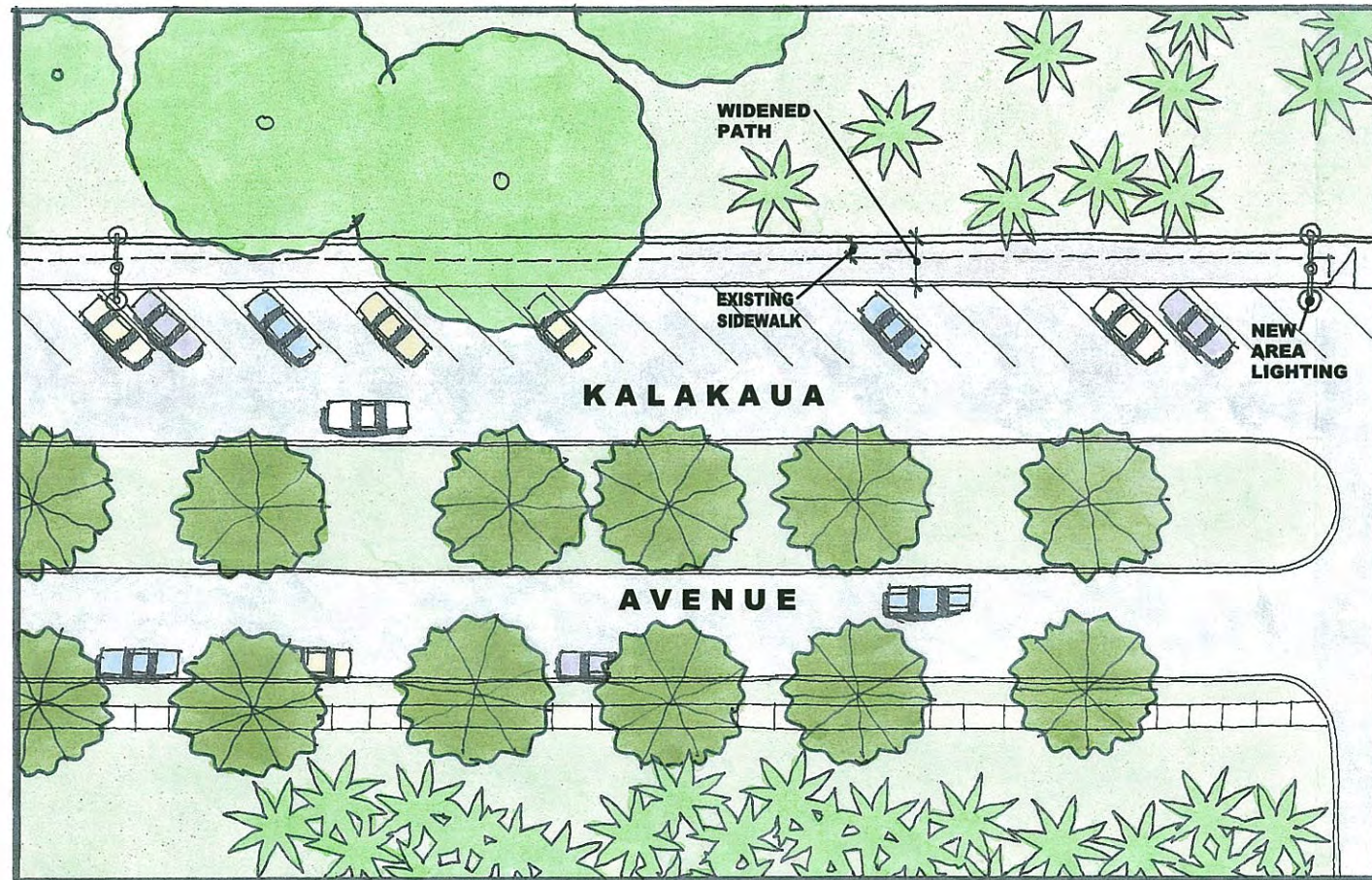
REVISION	DATE	DESCRIPTION	MADE BY	APPROVED

DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY & COUNTY OF HONOLULU  
**PAKI AVENUE IMPROVEMENTS**  
FOR  
**KAPIOLANI REGIONAL PARK**  
MASTER PLAN UPDATE  
HONOLULU, OAHU, HAWAII  
TAX MAP KEY: 3-1-43

APPROVED:	
Director, Department of Design and Construction	Date
CONCUR:	
Director, Department of Parks and Recreation	Date



**KEY MAP**  
GRAPHIC SCALE IN FEET  
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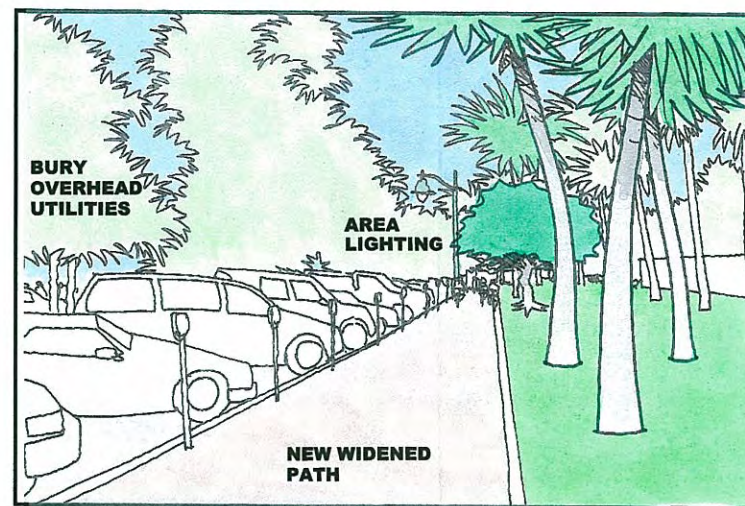
**PATHWAY WIDENING - TYPICAL IMPROVEMENTS (KALAKAU AVE)**  
APPROXIMATE SCALE - 1"=20'-0"

**FIGURE 11**  
**SIDEWALK - WIDENING IMPROVEMENTS**

- REPLACE EXISTING WALK WITH WIDENED PATH
- RELOCATE OVERHEAD UTILITY LINES UNDERGROUND
- SUPPLEMENT EXISTING LANDSCAPE
- ADD PARK STANDARD LIGHTS

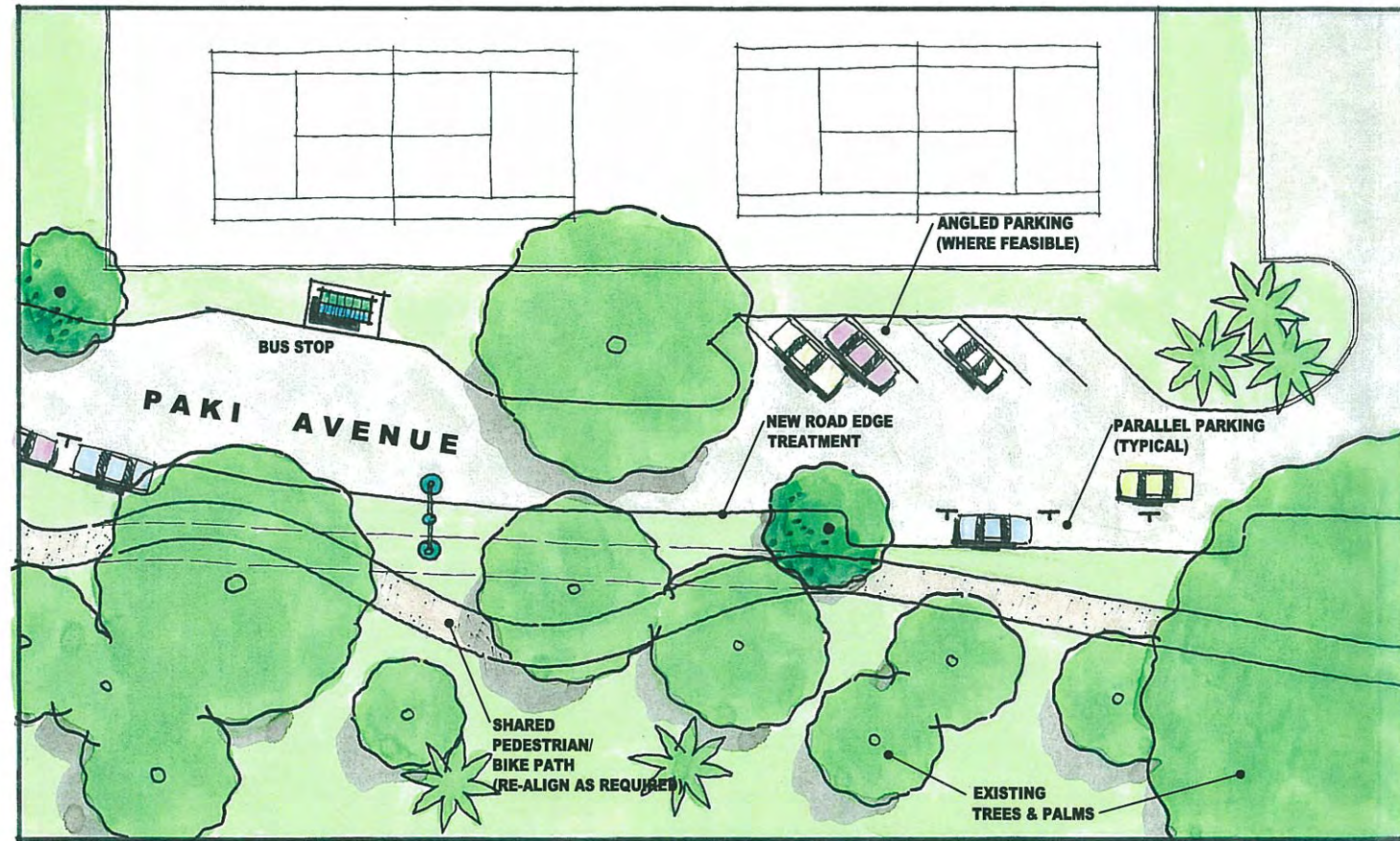


**EXISTING CONDITIONS**  
NOT TO SCALE



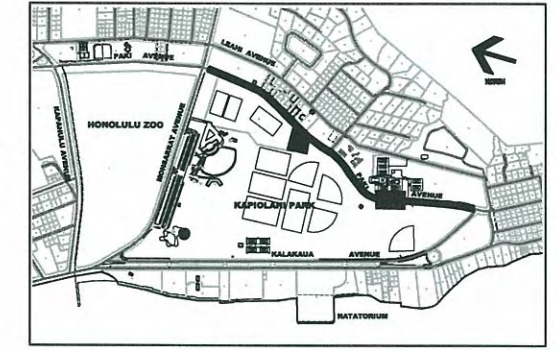
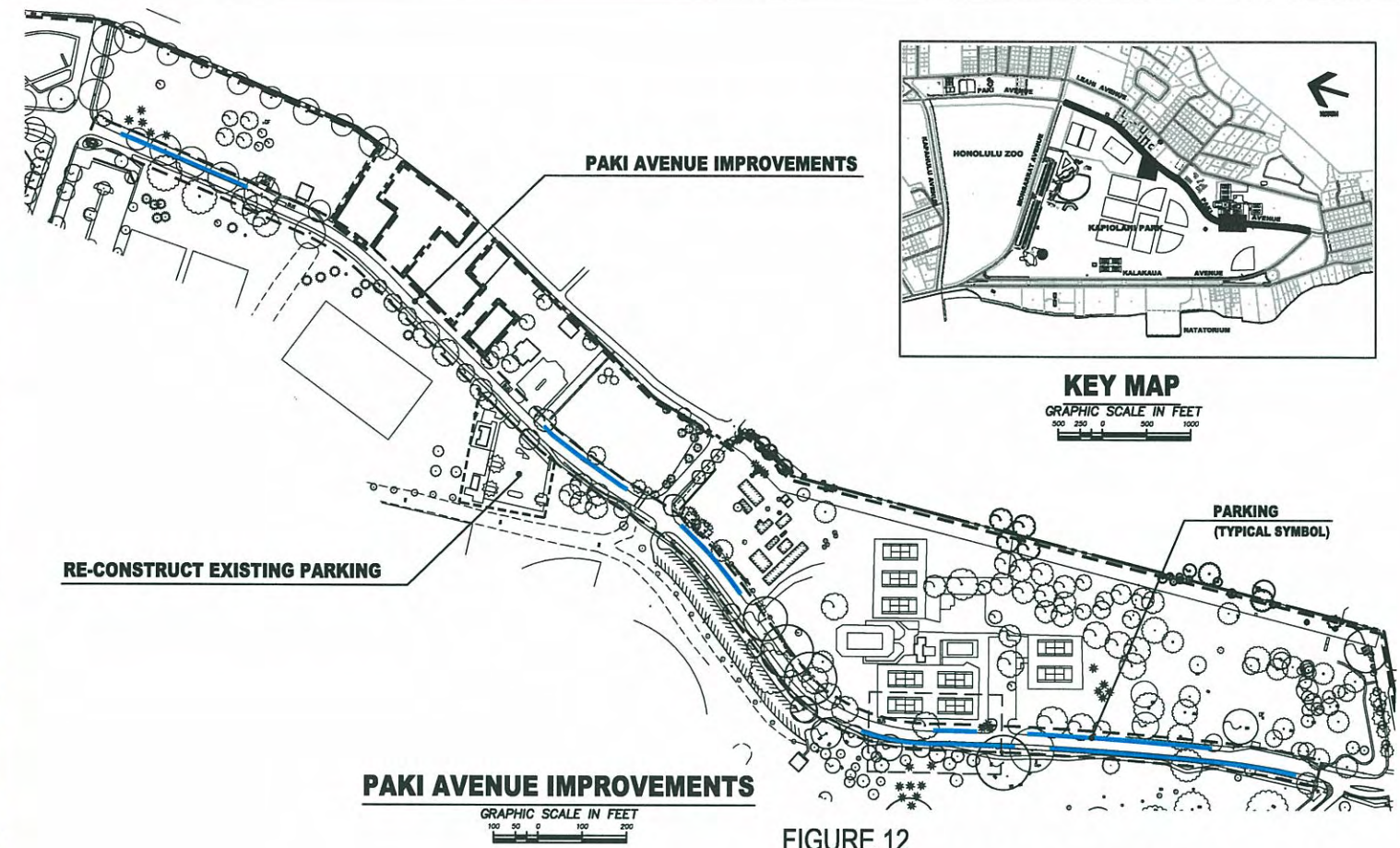
**PROPOSED IMPROVEMENTS**  
NOT TO SCALE

REVISION	DATE	DESCRIPTION	MADE BY	APPROVED
DEPARTMENT OF DESIGN AND CONSTRUCTION CITY & COUNTY OF HONOLULU <b>SIDEWALK-WIDENING IMPROVEMENTS</b> FOR <b>KAPIOLANI REGIONAL PARK</b> <b>MASTER PLAN UPDATE</b> <small>HONOLULU, OAHU, HAWAII            TAX MAP KEY 9-1-48</small>				
<b>APPROVED:</b>				
Director, Department of Design and Construction				Date
<b>CONCUR:</b>				
Director, Department of Parks and Recreation				Date



**PAKI AVENUE - TYPICAL IMPROVEMENTS**

APPROXIMATE SCALE - 1"=20'-0"



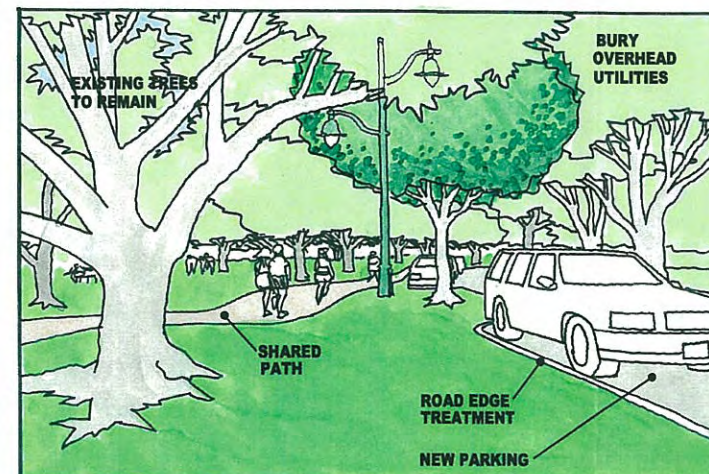
**KEY MAP**  
GRAPHIC SCALE IN FEET  
0 200 400 600 800 1000

**FIGURE 12**  
**PAKI AVENUE IMPROVEMENTS**

- BURY OVERHEAD UTILITY LINES (REMOVE POLES)
- ROADWAY IMPROVEMENTS (PAVEMENT AND EDGE TREATMENT)
- PROTECT EXISTING TREES
- PROVIDE PARKING
- ADD STREET TREES
- RE-CONSTRUCT EXISTING PARKING
- DEMOLISH EXISTING STRUCTURES
- DRAINAGE IMPROVEMENTS
- RE-CONSTRUCT PARKING AREA (50-60 STALLS)
- REPLACE EXISTING COMFORT STATION



**EXISTING CONDITIONS**  
NOT TO SCALE



**PROPOSED IMPROVEMENTS**  
NOT TO SCALE

REVISION	DATE	DESCRIPTION	MADE BY	APPROVED

DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY & COUNTY OF HONOLULU  
**PAKI AVENUE IMPROVEMENTS**  
FOR  
**KAPIOLANI REGIONAL PARK**  
MASTER PLAN UPDATE  
HONOLULU, OAHU, HAWAII  
TAX MAP KEY: 3-1-43

APPROVED:	
Director, Department of Design and Construction	Date
CONCUR:	
Director, Department of Parks and Recreation	Date

The Master Plan Update recommends acquiring the residential lots between Paki and Leahi Avenues. The residential lots would be acquired only when they become available. The City has also adopted policies involving property tax incentives to encourage owners of certain properties desired by the City to be willed to the City while they are alive. The properties are then taken over by the City for park use upon the death (s) of the owner (s).

For example, The City and County of Honolulu is the owner of Tax Map Key 3-1-026: 014. According to the deed, the City will only obtain full use of the property after the demise of the present occupant(s), which has not yet occurred.

**A. No Action**

A No Action alternative would maintain the status quo of Kapiolani Regional Park. Environmental impacts both short and long-term and beneficial and adverse described in this Assessment would be foregone. Under this alternative, Paki Avenue will remain in substandard condition, overhead utility lines will continue to detract from the visual quality of the Park and its environs, and haphazard parking conditions will continue.

**B. Circulation Alternatives**

Early in the planning process, four circulation alternatives were developed. The purpose for addressing and evaluating circulation and traffic alternatives “was to determine if there were feasible traffic options that would improve and enhance the use and enjoyment of the KRP (Miyabara, 1999)”. The actions comprising each of the four alternatives are presented below (bulleted items) followed by an evaluation of potential impacts.

## 1. Alternative “A” (Figure 13)

## Proposed Actions:

- Close Monsarrat Avenue (except for bus traffic) from Kalakaua Avenue
- Close Kalakaua Avenue (eastbound) on to Monsarrat Avenue
- Re-align Kalakaua Avenue off Paki Avenue (Diamond Head Road)
- Allow two-way traffic on Monsarrat Avenue (Paki Avenue to Waikiki Shell parking lot)

## Potential Impacts

The partial closure of Monsarrat Avenue will reduce northbound traffic through the Park (on Kalakaua Avenue) and provide a better interface between the Zoo and the rest of the Park. It is recognized that the current Bus route and terminal on Monsarrat Avenue are important to the public transit system of the Waikiki area and will be maintained. Allowances will need to be made to maintain access to the Waikiki Shell and Kapiolani Bandstand parking areas.

Widening Paki Avenue as a mitigating measure will have adverse effects. A road widening program will require either the use of Zoo lands or affect the existing mature Monkeypod trees, currently on the City’s List of Exceptional Trees.

Southbound traffic on Kalakaua Avenue will increase. Kalakaua Avenue will continue as a thoroughfare to the Diamond Head area but will be reconfigured to accommodate primarily park-user traffic. Enhanced pedestrian features will be required to improve access across Kalakaua Avenue. Realignment Kalakaua Avenue at the south end of the Park will improve the intersection condition but will continue to present a barrier at the extreme south end of the Park.



## 2. Alternative “B” (Figure 14)

### Proposed Actions:

- Close Monsarrat Avenue from Kalakaua Avenue to Waikiki Shell parking lot
- Close Kalakaua Avenue (eastbound) on to Monsarrat Avenue
- Close Kalakaua Avenue from Paki Avenue to Dillingham Fountain
- Partially convert Paki Avenue to one-way (southbound)
- Partially convert Leahi Avenue to one-way (northbound)
- Partially widen Paki Avenue

### Potential Impacts

The partial closure of Monsarrat Avenue to both vehicle and Bus traffic allows for the complete integration of the Honolulu Zoo, Waikiki Shell, and Kapiolani Bandstand. This alternative will require the rerouting of current Bus routes and other related improvements on Monsarrat Avenue probably on to Kapahulu Avenue (which would be widened).

Converting Paki and Leahi Avenues to one-way streets reduces the widening requirements for both roads; traffic, however, is expected to increase on both roads.

Closing Monsarrat Avenue will reduce northbound traffic through the Park on Kalakaua Avenue and at the same time increase traffic in the southbound direction. Realignment Kalakaua Avenue off Paki Avenue at the south end of the Park eliminates a major barrier at that area of the Park. Widening of Kalakaua Avenue and Poni Moi Road at the south end of the Park are proposed as mitigating measures. Requirements and treatment of Kalakaua Avenue are similar to Alternative A.

## 3. Alternative “C” (Figure 15)

### Proposed Actions:

- Close Kalakaua Avenue from Monsarrat Avenue (except for emergency vehicles)
- Close Kalakaua Avenue from Paki Avenue to Dillingham Fountain

### Potential Impacts

Closing Kalakaua Avenue and converting it to primarily internal park use only will reduce through traffic and improve the interface between the beach and mauka areas of the Park. Access to the private properties along Kalakaua Avenue will be reduced but emergency access will be maintained.

Paki Avenue and Poni Moi Road will have to be widened and traffic on both roads will increase. The impacts of widening Paki Avenue are similar to the impacts discussed in Alternative A. Widening of Kapahulu Avenue is proposed as a mitigating measure.

Realignment Kalakaua Avenue at the south end will allow for integration of that portion of the Park.

#### 4. Alternative "D" (Figure 16)

##### Proposed Actions:

- Close (except for Bus traffic) Monsarrat Avenue from Kalakaua Avenue to Waikiki Shell parking lot
- Close Kalakaua Avenue (eastbound) on to Monsarrat Avenue
- Close Kalakaua Avenue (northbound) from Paki Avenue
- Close Paki Avenue (Kawahulu Avenue to new Leahi Avenue)
- Allow two-way traffic on Monsarrat Avenue (Paki Avenue to Waikiki Shell parking lot)

##### Potential Impacts

Closing Paki Avenue will remove a barrier between the Paki/Leahi area and the rest of the Park. This will allow for more integration and better use of the Park resources in this area. Improvements at the Leahi and Kapahulu Avenue intersection will simplify and clarify traffic movement as well as provide for an expanded entry to the Park.

The section of Monsarrat Avenue used for bus traffic can be developed as an attractive and safe transit mall accommodating pedestrian and bicycle movement. This alternate will also allow for better integration of the Zoo with the rest of the Park.

Kalakaua Avenue will continue to accommodate vehicular traffic. Design features will need to be incorporated to improve access and pedestrian and bicycle movement. Realignment Kalakaua Avenue at the south end will remove a barrier and better integrate that portion of the Park.

Road widening of Leahi Avenue, Poni Moi Road, Kapahulu Avenue, and various intersection improvements are proposed as mitigating measures.

#### **C. Master Plan Update - Preferred Alternative**

Circulation Alternatives "A" thru "D" were not selected for implementation in the Kapiolani Regional Park Master Plan Update because changes in existing circulation patterns could affect vehicle circulation beyond the limits of the Park in neighborhoods such as Waikiki, Kapahulu, and Diamond Head. Changes to the existing circulation pattern also would affect bus routes and bus stops on streets in the vicinity of the Park.

The Master Plan Update proposes no changes in overall traffic circulation around the Park. The proposed reconstruction of Paki Avenue with associated edge treatment would improve rather than change traffic circulation patterns along that roadway.

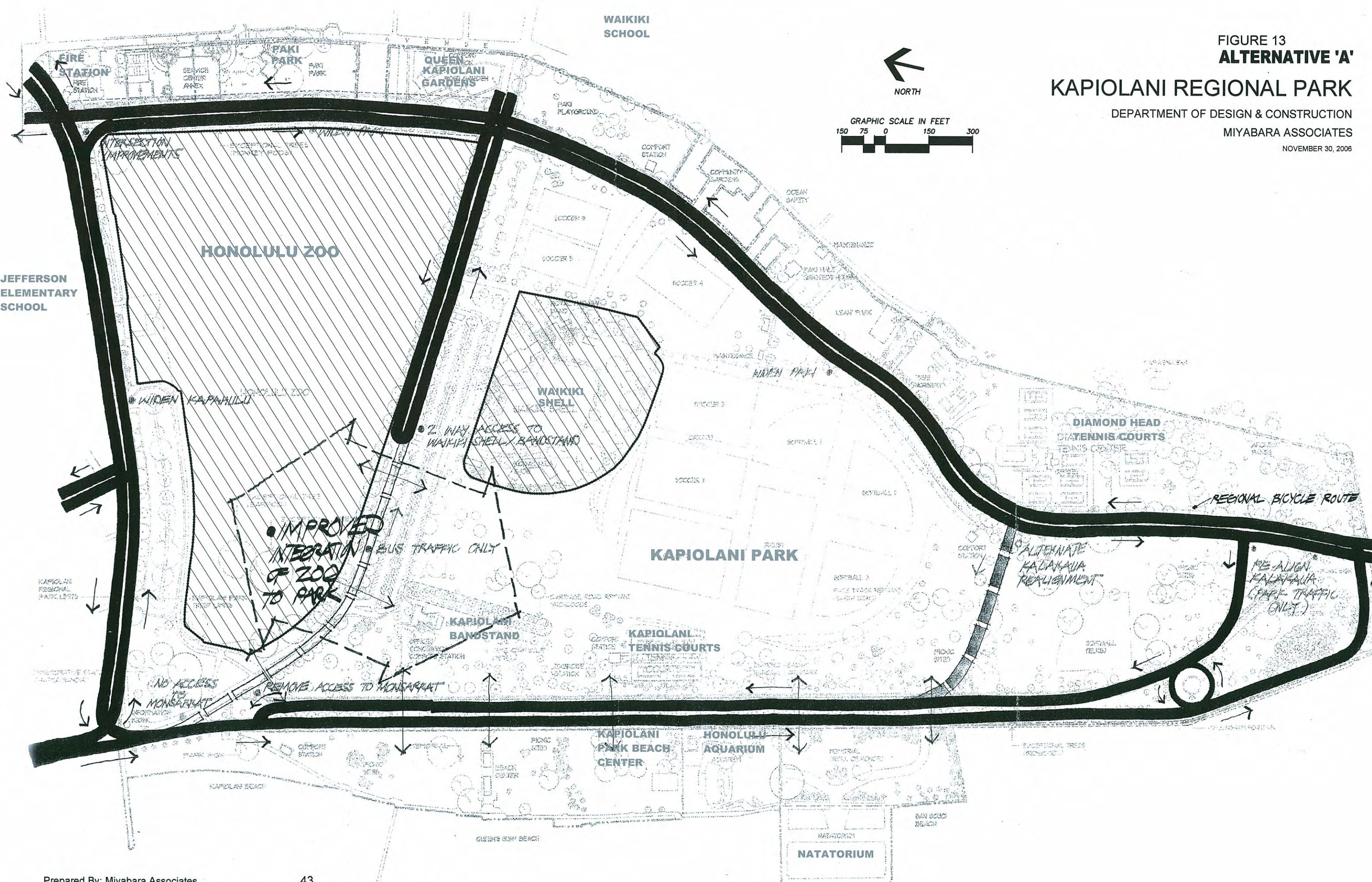


FIGURE 13  
**ALTERNATIVE 'A'**

**KAPIOLANI REGIONAL PARK**

DEPARTMENT OF DESIGN & CONSTRUCTION

MIYABARA ASSOCIATES

NOVEMBER 30, 2006

FIGURE 14  
ALTERNATIVE 'B'

# KAPIOLANI REGIONAL PARK

DEPARTMENT OF DESIGN & CONSTRUCTION

MIYABARA ASSOCIATES

NOVEMBER 30, 2006

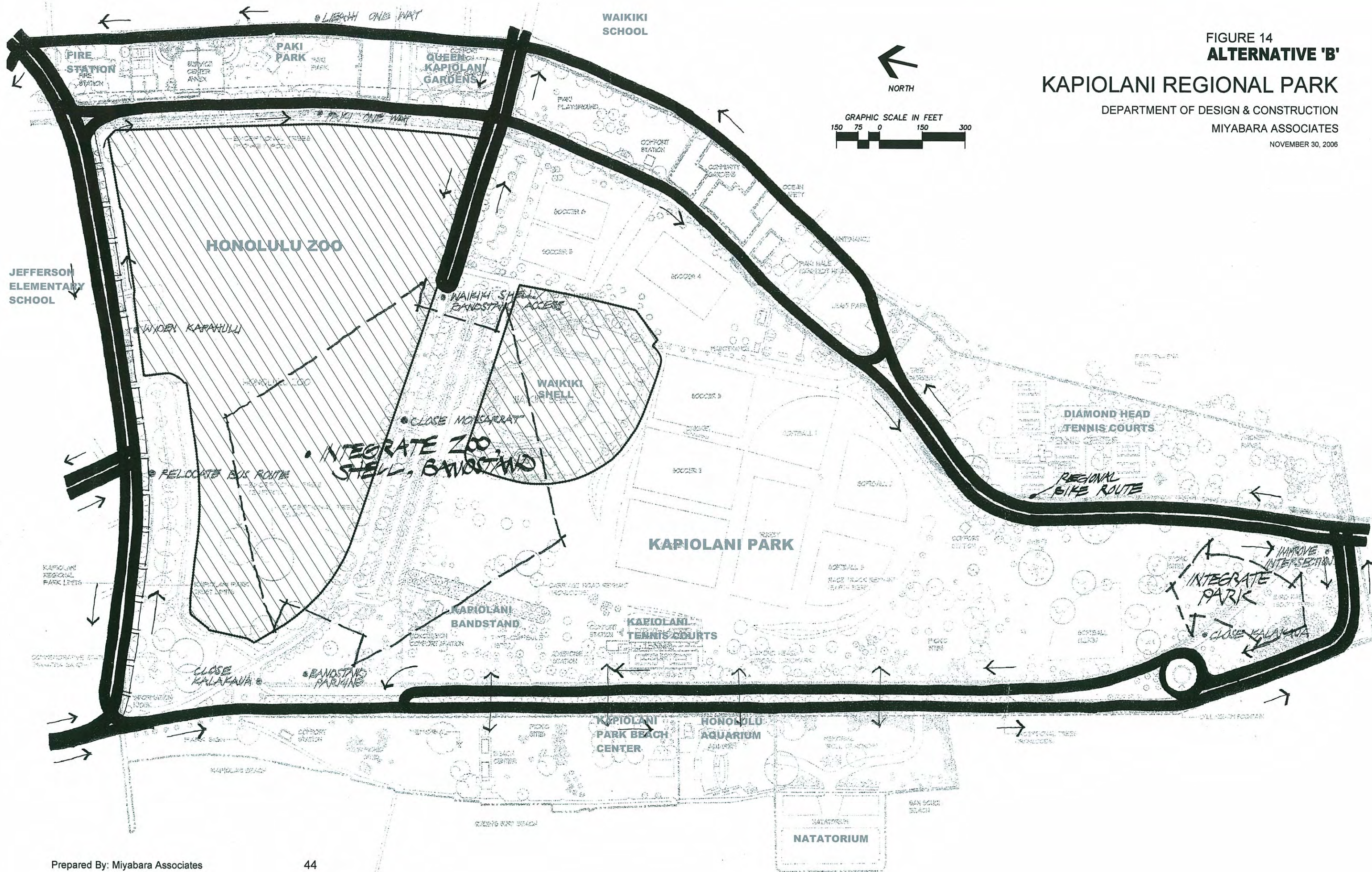


FIGURE 15  
**ALTERNATIVE 'C'**

# KAPIOLANI REGIONAL PARK

DEPARTMENT OF DESIGN & CONSTRUCTION

MIYABARA ASSOCIATES

NOVEMBER 30, 2006

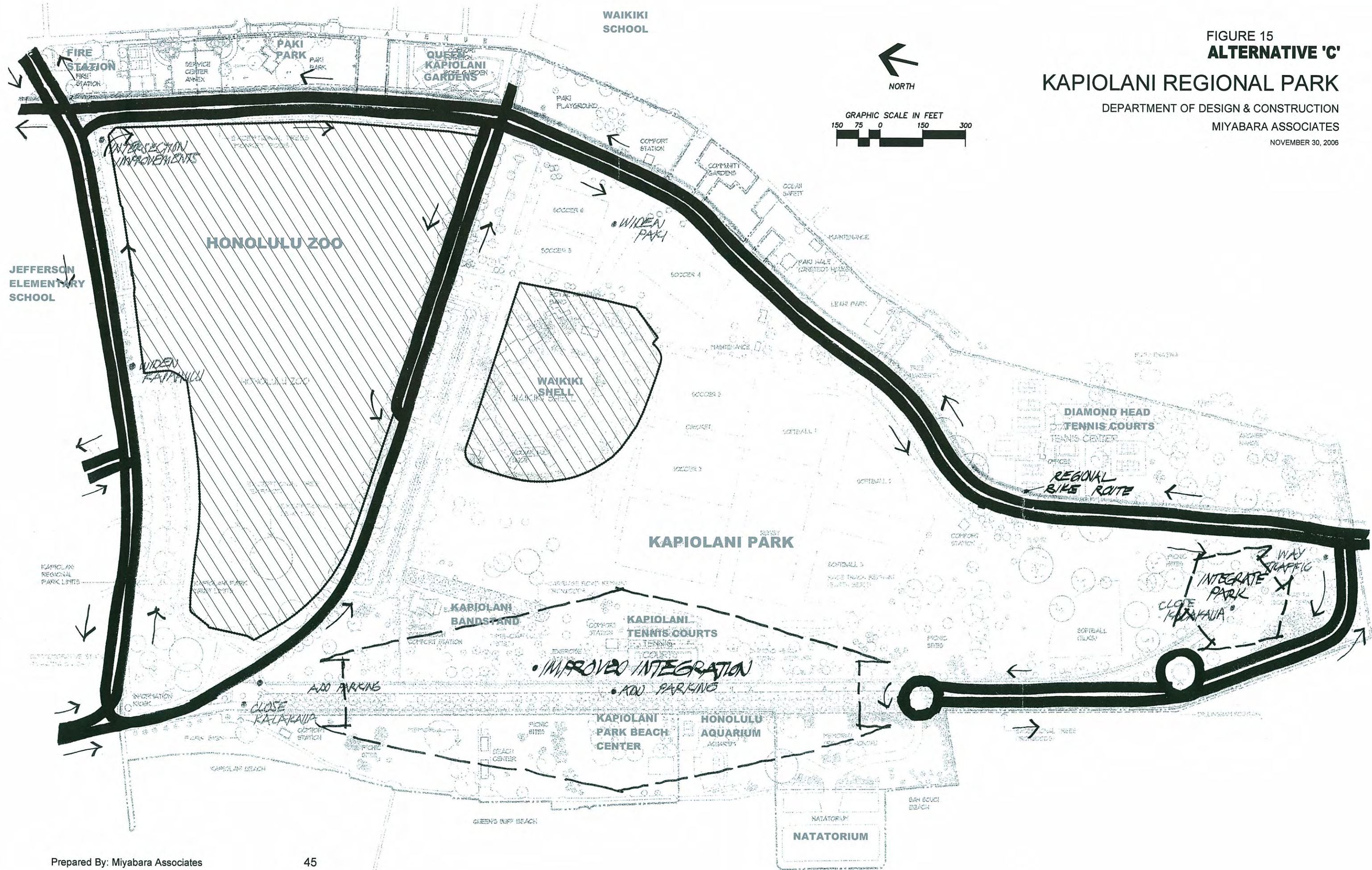


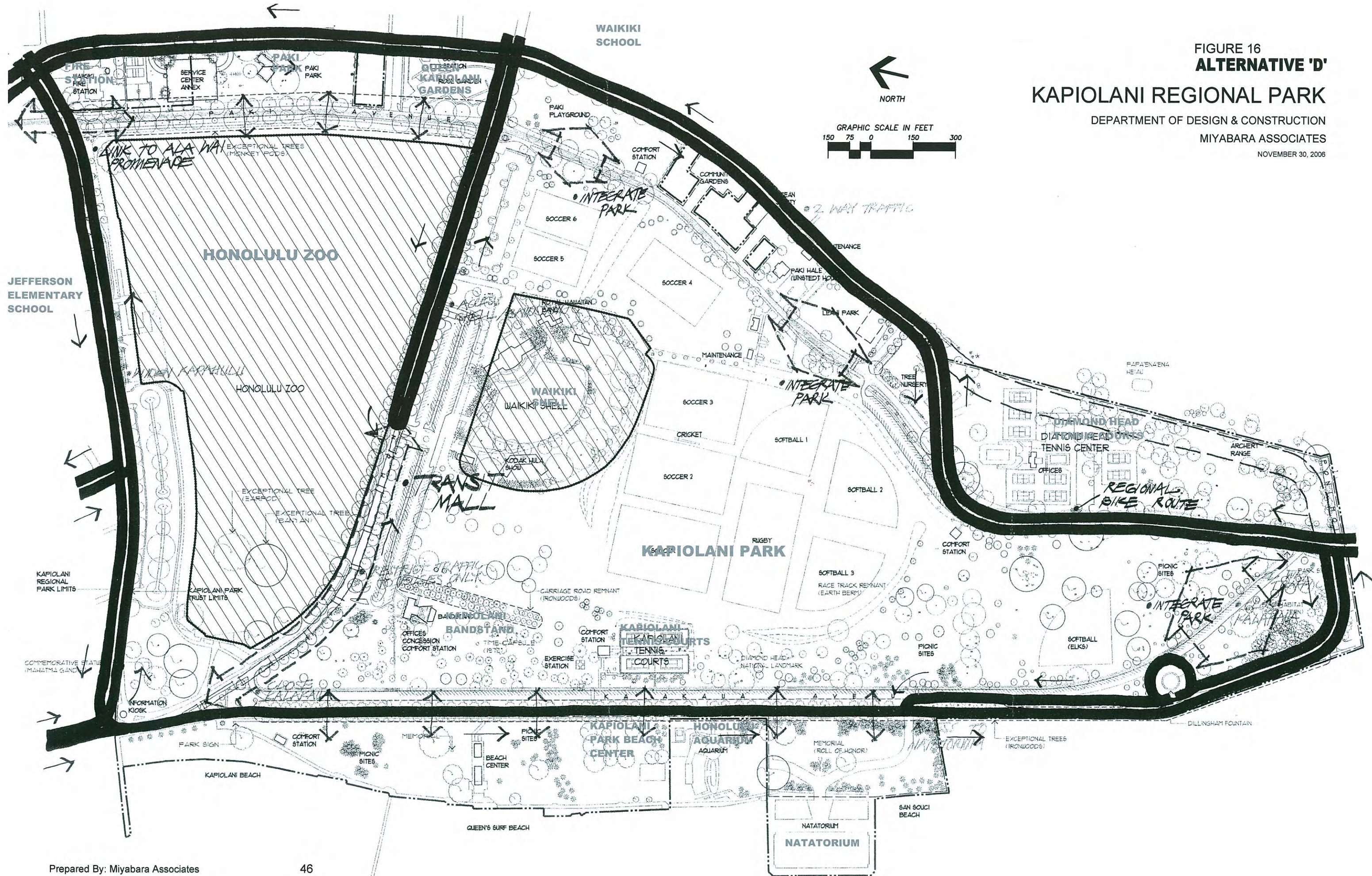
FIGURE 16  
ALTERNATIVE 'D'

# KAPIOLANI REGIONAL PARK

DEPARTMENT OF DESIGN & CONSTRUCTION

MIYABARA ASSOCIATES

NOVEMBER 30, 2006



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## SECTION 5

## UNRESOLVED ISSUES

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Section 5 has been deleted since there are no unresolved issues associated with the Kapiolani Regional Park Master Plan Update.

Permits and approvals that may be required to implement the various improvements proposed by the Master Plan are listed below. In the absence of specific design plans, the listing should be considered a general overview of permitting requirements. Additional permits and approvals may be required depending on design and construction plans for the various improvements.

**City and County of Honolulu**

Department of Planning and Permitting

Special Management Area Permit

Special District Permit (Diamond Head Special District)

Grubbing, Grading, and Stockpiling Permit

Building Permit for Building, Electrical, Plumbing Sidewalk/Driveway and Demolition Work

Permit to Excavate Public Right-of-Way (Trenching)

**Exception** (Diamond Head Special District Height Requirement)

Department of Transportation Services

Street Usage Permit

**State of Hawaii**

Department of Health

Variance from Pollution Controls (Noise Permit)

Department of Land and Natural Resources

Historic Site Review



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## SECTION 7

## AGENCIES AND ORGANIZATIONS CONSULTED IN THE ASSESSMENT PROCESS

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The Draft Environmental Assessment for the Kapiolani Regional Park Master Plan Update was published in the Office of Environmental Quality Control Environmental Notice of June 8, 2007. Publication initiated a 30-day public review period ending on July 9, 2007. The Draft Environmental Assessment was mailed to the agencies and organizations identified below. An asterisk \* identifies agencies and organizations that submitted written comments during the review period. All comment letters and responses are found in Appendix A.

### **City and County of Honolulu**

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

### **State of Hawaii**

- \*Department of Health
- \*Office of Environmental Quality Control**
- Department of Land and Natural Resources
- State Historic Preservation Division
- \*Office of Hawaiian Affairs

### **Agencies and Organizations**

- \*Hawaiian Electric Company, Inc.
- \*Hawaiian Telcom
- \*Oceanic **Time Warner** Cable
- Honolulu City Council
- \*Councilmember Barbara Marshall**
- \*Kapiolani Park Advisory Council
- \*Kapiolani Park Preservation Society
- \*The Outdoor Circle
- \*Hawaii Hotel **and Lodging** Association
- Waikiki Improvement Association
- Waikiki Business Improvement District Association
- \*Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board No. 5
- Waikiki Neighborhood Board No. 9
- \*Hawaii's Thousand Friends**
- \*Richard and Elizabeth Kamis** (via email)
- \*Rico Leffanta**
- \*Melissa Everest (Postcard)**

**Pre-Assessment Consultation**

Kapiolani Park Preservation Society

Department of Parks and Recreation

Department of Planning and Permitting

Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board (Presentation)

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## SECTION 8

## DETERMINATION OF SIGNIFICANCE

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

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

Natural or cultural resources will not be lost or destroyed as a result of the proposed improvements.

Portions of Kapiolani Regional Park are registered historic features thus the proposed improvements will be subject to review by the State Historic Preservation Division.

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

Public use and enjoyment of Kapiolani Regional Park will be expanded rather than curtailed.

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

The proposed improvements do not conflict with long-term environmental policies, goals, and guidelines of the State of Hawaii.

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

Improvements proposed in the Kapiolani Regional Park Master Plan Update will not substantially affect the economic or social welfare of the community or State.

- 5) Substantially affects public health;

Public health will not be adversely affected.

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

Substantial secondary impacts are not anticipated beyond the proposed displacement of residents within the green belt bordered by Pahi and Leahi Avenues.

- 7) Involves a substantial degradation of environmental quality;

Environmental quality of the Park and the surrounding Waikiki, Diamond Head, and Kapahulu neighborhoods will not be degraded.

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

The proposed improvements will neither adversely affect existing environmental characteristics nor involve a commitment for larger actions. The scope of the individual improvements is intended to upgrade existing recreation facilities and areas, enhance the aesthetics of the Park and the neighborhood, improve circulation and parking, and comply with current regulatory requirements. The intended beneficiaries are clearly those that recreate at the Park and residents of the surrounding neighborhood.

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

Rare, threatened or endangered flora or fauna or habitat have not been recorded in Kapiolani Regional Park. The Park, however, contains Exceptional Trees that are protected by City ordinance. The location of these trees is well documented and will not be affected by the proposed improvements.

- 10) Detrimentially affects air or water quality or ambient noise levels; or

Ambient air quality will be affected by fugitive dust and combustion emissions generated during construction, but can be controlled by measures stipulated in this Assessment. Construction noise will be most audible during site preparation work and will diminish during the varying construction stages that follow. Noise will be temporary at any one location and its duration will vary by the length of time it takes to construct the respective improvement.

All construction activities will comply with air quality and noise pollution regulations of the State Department of Health.

Erosion control measures will be prescribed in grading plans and best management practices prepared for the project.

In lieu of a drainage master plan and to comply with City storm water quality policies, storm water would be directed to open space low elevation areas and allowed to percolate into the ground or to evaporate. Other methods may be implemented pursuant to approved, site-specific Best Management Practices and criteria in Part II Water Quality Criteria, City Rules Relating to Storm Drainage Standards (Department of Planning and Permitting, 2000).

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

Park lands *mauka* of Kalakaua Avenue are not located in an environmentally sensitive area. Park lands *makai* of Kalakaua Avenue are located in a flood zone.

Improvements are not proposed on land in an environmentally sensitive area.

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

The proposed improvements will not affect scenic vistas associated with the Park. Placing overhead utility lines underground will greatly improve the visual quality of the roads and exterior edges of the Park.

13) Requires substantial energy consumption.

Energy demand should not increase substantially because new lighting facilities are not proposed and new fixtures would replace existing fixtures in kind. The use of energy efficient street light fixtures could reduce the demand for electrical energy.

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## REFERENCES

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- Belt Collins Hawaii. May 2000. *Environmental Assessment for Honolulu Zoo Master Plan Waikiki, Oahu, Hawaii. TMK: 3-1-43:1-Portion of Kapiolani Regional Park*. Prepared for City and County of Honolulu, Department of Design and Construction.
- Brong, Mary. 1993. *Updated Honolulu Zoo Master Plan "A Vision for the Future."*
- Chu, Michael and Robert B. Jones. 1987. *Coastal View Study*. Prepared for Department of Land Utilization, City and County of Honolulu.
- City and County of Honolulu, January 1983. *Waikiki 2000 Kapiolani Park Master Design Plan*. Mayor Eileen R. Anderson, City and County of Honolulu.
- City and County of Honolulu. January 1983. *Waikiki 2000 Kapiolani Park Management Policy*. Mayor Eileen R. Anderson, City and County of Honolulu.
- City and County of Honolulu. *Revised Ordinances of Honolulu*. Chapter 41, Article 13. Protective Regulations for Exceptional Trees.
- Department of Parks and Recreation. January 1983. *Kapiolani Park Master Design Plan*. Advance Planning, Facilities Division, Department of Parks and Recreation, City and County of Honolulu.
- Department of Parks and Recreation, City and County of Honolulu. April 1997. *Index of O'ahu Parks and Facilities*.
- Department of Planning and Permitting. May 1999. *Land Use Ordinance*. Ordinance No. 99-12. City and County of Honolulu.
- Department of Planning and Permitting, City and County of Honolulu. October 2002. *General Plan Objectives and Policies*. As amended by Resolution 02-205, CD1.
- Department of Planning and Permitting, City and County of Honolulu. June 2004. *Primary Urban Center Development Plan*.
- Department of Transportation Services. April 1999. Honolulu Bicycle Master Plan. Prepared by Helber Hastert & Fee, Planners, Bicycle Federation of America, Engineering Concepts, Inc., and David Cheever Marketing.
- Federal Emergency Management Agency. November 2000. *Flood Insurance Rate Map*. Community Panel No. 15003C0370E.
- Mink, John F. and L. Stephen Lau. February 1990 (Revised). *Aquifer Identification and Classification for O'ahu, Groundwater Protection Strategy for Hawai'i*. Technical Report No. 179. Water Resources Research Center, University of Hawaii at Manoa. Honolulu, Hawaii.

Miyabara Associates. 2006. *Master Plan for Kapiolani Regional Park Master Plan Update*. Prepared for Department of Design and Construction, City and County of Honolulu.

Park, Gerald Urban Planner. April 2003. September 2005. June 2006. *Site Investigation*.

Urban Works. No Date. *Honolulu Zoo Entry Site Plan*.

U.S. Department of Agriculture, Soil Conservation Service. August 1972. *Soil Survey Report for Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii*. In Cooperation with the University of Hawaii Agricultural Experiment Station.

Weyeneth, Robert R. Ph.D. March 1991. *Kapi'olani Park: A Victorian Landscape of Leisure*. Prepared for Department of Parks and Recreation, City and County of Honolulu.

APPENDIX A

COMMENT LETTERS AND RESPONSES





June 16, 2007

Gerald Park Urban Planner  
1221 Kapiolani Blvd., Suite 211  
Honolulu, Hawaii 96814

Attn: Mr. Gerald Park

**Subject: Kapiolani Regional Park Master Plan Update**

Dear Mr. Park,

Thank you for allowing Oceanic the opportunity to comment on the Proposed Kapiolani Park Master plan Project. Oceanic currently has both aerial and underground Fiber optic and coax facilities along the Roadways surrounding Kapiolani Park. These facilities service many different types of customers ranging from the Waikiki Shell, Honolulu Zoo, Hotels, and other Residential buildings. Our Fiber optic and coax facilities also go on to service much of the Waikiki, Kapahulu, Kaimuki and Kahala areas. Should the Development team decide to alter the existing aerial Joint Poles or underground conduit and pullbox/manhole facilities we would like to be kept informed of the proposed plans. I've enclosed an overall map indicating the areas that have we have our facilities. Should you have any questions or need anything clarified, please contact me at #625-8346.

Sincerely,

  
Randy Makizuru  
OSP Engineer

Enclosure(s)



GERALD PARK  
Urban Planner

■ Planning  
■ Land Use  
■ Research  
■ Environmental  
■ Studies

■ 1221 Kapiolani Blvd.  
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Honolulu, Hawaii  
96814

■ Telephone:  
(808) 596-7484

■ Facsimile:  
(808) 596-7485

■ email:  
gparkurbanplanner  
@hawaiiainet.net

April 10, 2008

Randy Makizuru, OSP Engineer  
Oceanic Time Warner Cable  
200 Akamaiui Street  
Milliani, Hawaii 96789-3999

Dear Mr. Makizuru:

**Subject: Kapiolani Regional Park Master Plan Update**  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. The information and map you provided showing Oceanic's facilities in the vicinity of Kapiolani Regional Park have been passed on to the Department of Design and Construction.

Oceanic will be consulted as plans for placing utility systems underground are formulated during the design process.

We appreciate the participation of Oceanic Time Warner Cable in the environmental review process.

Sincerely,

GERALD PARK URBAN PLANNER



Gerald Park

c: T. Hildebrand, DDC



**CITY COUNCIL**  
 CITY AND COUNTY OF HONOLULU  
 HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

**BARBARA MARSHALL**  
 COUNCIL CHAIR  
 (808)547-7003 [BMARSHALL@HONOLULU.GOV](mailto:BMARSHALL@HONOLULU.GOV)

June 15, 2007

Mr. Gerald Park  
 1221 Kapi'olani Blvd., Suite 211  
 Honolulu, HI 96814

Dear Mr. Park,

Thank you for transmitting to my office a copy of the Kapi'olani Park Master Plan Update. After reviewing the documents, I do feel that the park and its users will benefit greatly from the improvements that are planned for the area. I do, however, have a concern with acquiring the "few remaining residential lots between Paki and Leahi Avenues." I appreciate and understand that the acquisition of these private lots may indeed be consistent with previous master plan recommendations; however, I personally have grave concerns with condemning private land for any purpose. Not that I oppose this part of the plan, but I always have reservations about acquiring private property, and I wanted to make you aware of my perspective.

I thank you again for sharing your plans with me- they were very insightful.

Aloha,

Barbara Marshall  
 Council Chair

**received**  
 6.19.07



GERALD PARK  
 Urban Planner

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- Research
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- Studies

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 e-mail:  
 gparkurbanplanner  
 @hawaiiainet.net

April 10, 2008

The Honorable Barbara Marshall  
 Council Chair, Honolulu City Council  
 Honolulu, Hale  
 Honolulu, Hawaii 96813-3065

Dear Chair Marshall:

Subject: Kapiolani Regional Park Master Plan Update

Thank you for reviewing the Draft Environmental Assessment prepared for the Kapiolani Regional Park Master Plan Update.

In response to your comment about acquiring residential lots between Paki and Leahi Avenues through condemnation, the residential lots would be acquired only when they become available. The City has also adopted policies involving property tax incentives to encourage owners of certain properties desired by the City to be willed to the City while they are alive. The properties are then taken over by the City for park use upon the death (s) of the owner (s).

Your participation in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC

HONOLULU FIRE DEPARTMENT  
CITY AND COUNTY OF HONOLULU

638 South Street  
Honolulu, Hawaii 96813-5007  
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd



MUFI HANNEMANN  
MAYOR

KENNETH G. SILVA  
FIRE CHIEF  
ALVIN K. TOMITA  
DEPUTY FIRE CHIEF

June 14, 2007

Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
Honolulu, Hawaii 96814

Dear Mr. Park:

Subject: Kapiolani Regional Park Master Plan Update  
Tax Map Key: Various  
Waikiki, District of Honolulu, Oahu, Hawaii

In response to your letter of May 31, 2007, regarding the above-mentioned subject, the Honolulu Fire Department reviewed the material you provided and has no objections to the master plan update.

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 723-7151.

Sincerely,

KENNETH G. SILVA  
Fire Chief

KGS/SK:bh



GERALD PARK  
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April 10, 2008

Kenneth G. Silva, Fire Chief  
Fire Department  
City and County of Honolulu  
636 South Street  
Honolulu, Hawaii 96813-5007

Dear Chief Silva:

Subject: Kapiolani Regional Park Master Plan Update  
Tax Map Key: Various  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for your letter indicating the Honolulu Fire Department has no objections to the Kapiolani Regional Park Master Plan Update.

The participation of the Honolulu Fire Department in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC

**BOARD OF WATER SUPPLY**

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



June 20, 2007

MUPI HANNEMANN, Mayor  
RANDALL Y. S. CHUNG, Chairman  
SAMUEL T. HATA  
ALLY J. PARK  
ROBERT K. CUNDIFF  
MARC C. TILNER  
LAVERNE T. HIGA, Ex-Officio  
BARRY FUKUNAGA, Ex-Officio  
CLIFFORD P. LUM  
Manager and Chief Engineer  
DEAN A. NAKANO  
Deputy Manager and Chief Engineer

Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
Honolulu, Hawaii 96814

Dear Mr. Park:

Subject: Your Letter Dated May 31, 2007 Regarding Kapiolani Regional Park Master  
Plan Update, Environmental Assessment

Thank you for the opportunity to comment on the proposed project.

The construction drawings should be submitted for our review and approval.

If you have any questions, please contact Robert Chun at 748-5440.

Very truly yours,

for  
KEITH S. SHIDA  
Principal Executive  
Customer Care Division



April 10, 2008

GERALD PARK  
Urban Planner

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@hawaiiintel.net

Clifford P. Lum  
Manager and Chief Engineer  
Board of Water Supply  
630 South Beretania Street  
Honolulu, Hawaii 96843

Dear Mr. Lum:

Subject: Kapiolani Regional Park Master Plan Update

Thank you for reviewing the Draft Environmental Assessment prepared for the Kapiolani  
Regional Park Master Plan Update. Construction drawings for the planned  
improvements shall be submitted to the Board of Water Supply as they are prepared.

The participation of the Board of Water Supply in the environmental assessment review  
process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC



**HAWAII HOTEL & LODGING**  
ASSOCIATION

June 21, 2007

Gerald Park  
Urban Planner  
Land Use Research Environmental Studies  
1221 Kapiolani Blvd., Suite 211  
Honolulu, Hawaii 96814

Dear Mr. Park


The Hawaii Hotel & Lodging Association is a statewide association of hotels, condominiums, timeshare companies, management firms, suppliers, and other related firms and individuals. Our membership includes over 170 hotels representing over 47,300 rooms. Our hotel members range from the 2,523 rooms of the Hilton Hawaiian Village to the 4 rooms of the Bougainvillea Bed & Breakfast on the Big Island.

The Hawaii Hotel & Lodging Association has reviewed the Environmental Assessment for the Kapiolani Regional Park Master Plan Update. We have no significant comments regarding the recommended plan. We were, however, concerned about the impacts that would have been created by the proposed alternative circulation pattern. We believe the alternatives that impacted Kalakaua Ave. and Monsarrat Ave. would have been very disruptive. We support the recommendations to not significantly alter the traffic pattern in the area.

If you have any questions or concerns on this matter, please feel free to contact me at (808) 923-0407 or email at [mtowill@hawaiihotels.org](mailto:mtowill@hawaiihotels.org)

Mahalo for the opportunity to comment.

Mahalo & Aloha,

  
MURRAY TOWILL  
President

2270 KALAKAUA AVENUE, #1506 • HONOLULU, HI 96815-2552 • TEL: (808) 923-0407 • FAX: (808) 924-3843  
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April 10, 2008

Murray Towill, President  
Hawaii Hotel and Lodging Association  
2270 Kalakaua Avenue, Suite 1506  
Honolulu, Hawaii 96815-2552

Dear Mr. Towill:

Subject: Kapiolani Regional Park Master Plan Update

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan.

Your support for the Kapiolani Regional Park Master Plan Update and its recommendations to not alter the traffic pattern in the area is appreciated.

The participation of the Hawaii Hotel and Lodging Association in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER



Gerald Park

c: T. Hildebrand, DDC

received  
6.27.07

June 25, 2007

Gerald Park Urban Planner  
1221 Kapiolani Blvd.  
Honolulu, Hawaii 96814

Subject: **Kapiolani Regional Park Master Plan Update EA**

Dear Mr. Park:

Thank you for the opportunity to review the above project. We have the following comments to make:

- There are a few telephone poles on Kalakaua Avenue at the outskirts of the project area. There are no underground boxes and facilities within the project scope.
- Should the new zoo entrance improvements require the rerouting of telephone service, electrical drawings should be submitted to our office.

Should you have any questions, please call Noel Remigio at 546-4747.

Sincerely,

Jill Lee  
Manager – OSP Engineering, East & West Oahu

C: File (Waikiki)  
N. Remigio



GERALD PARK  
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@hawaiiantel.net

April 10, 2008

Jill Z. Lee  
Manager, OSP Engineering  
Hawaiian Telcom  
PO Box 2200  
Honolulu, Hawaii 96841

Dear Ms. Lee:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. As requested, your office will be consulted during the design phase for the proposed improvements. Electrical drawings for the new zoo entrance will be submitted to Hawaiian Telcom for review and approval if telephone service will be rerouted.

The participation of Hawaiian Telcom in the environmental review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC

LINDA LINGLE  
GOVERNOR OF HAWAII

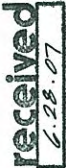


STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. Box 3378  
HONOLULU, HAWAII 96801-3378

CHYOME L. FUKINO, M.D.  
DIRECTOR OF HEALTH

In reply, please refer to:  
EPO-07-127

June 25, 2007



Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
Honolulu, Hawaii 96814

Mr. Park:

SUBJECT: Draft Environmental Assessment for Kapiolani Regional Park Master Plan  
Waikiki, Honolulu, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time. We strongly recommend that you review all of the Standard Comments on our website: [www.state.hi.us/health/environmental/env-planning/landuse/landuse.html](http://www.state.hi.us/health/environmental/env-planning/landuse/landuse.html). Any comments specifically applicable to this project should be adhered to.

If there are any questions about these comments please contact Jiakai Liu with the Environmental Planning Office at 586-4346.

Sincerely,

KELVIN H. SUNADA, MANAGER  
Environmental Planning Office

c: EPO



GERALD PARK  
Urban Planner

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April 10, 2008

Kelvin H. Sunada, Manager  
Environmental Planning Office  
919 Ala Moana Boulevard, Room 312  
Honolulu, Hawaii 96814-3378

Dear Mr. Sunada:

Subject: Draft Environmental Assessment for  
Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii  
EPO-07-127

Thank you for your letter indicating the various branches of the Environmental Health Administration have no objections to the Kapiolani Regional Park Master Plan Update.

The participation of the Environmental Planning Office in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC



Kapiolani Park Preservation Society  
P.O. Box 3059  
Honolulu, Hawaii 96802

Gerald Park  
1221 Kapiolani Blvd. Suite 211  
Honolulu, Hawaii 96814

25 June 2007

RE: Kapiolani Park Master Plan 2007

Dear Mr. Park:

Thank you for the opportunity to comment on the Draft Environmental Assessment of Kapiolani Park. (Please note that the name of the Park is not "Kapiolani Regional Park," it is simply Kapiolani Park.)

Below are KPPS' comments. Many are in bullet-point form for easy reference to the plan, and if you or your staff would like further clarification or elucidation of these short points, we would be most pleased to provide it.

- This report is confusing in its title and format. Apparently Figures 3 (p8), 11 (p36) and 12 (p37) are the draft of the Master Plan Update and the rest of the report is the draft of the Environmental Assessment.
- p. 2: 1. Zoo entrance – the report needs the latest site plan, the one that has KPPS support. The plan shown in the report is not the latest version and is not acceptable.
- p. 2: 2. Walkways widening - a good thing. Rather than concrete, use asphalt or some other soft walking surface, as this surface will be used exclusively by pedestrians, including runners, and a softer surface is more pleasant and also easier and healthier on the joints.
- p. 2: 3. Replace softball field – good for the park.
- p. 2: 4. Softball fields – This needs to specify portable and temporary backstops only, **no permanent obstructions in the park's great space**. KPPS has discussed this in the past with the then-Park manager Mike Smith, who assured KPPS that City agreed with the portable backstops.
- p. 3: 5. Accessibility improvements are okay, **but not necessary** in archery range area. It would be better to move the archery range to another park (see discussion below). When an "improvement" involves the necessity for removal of grass and the substitution of concrete, that "improvement" should come under hard scrutiny.
- p. 3: 6. Bicycle & moped parking - to be on existing parking surfaces **only**. No further park land to be paved over for parking of any kind.
- p. 3: 7. Underground overhead utilities – **excellent**. This may be the single most beneficial physical improvement to the Park that is possible.

- p. 3: 8. Paki Avenue improvements - good, but there should be no parking on the dangerous curve on Paki Avenue. This issue has been raised time & again, and one of the present parking lots was built precisely so that there would be no necessity for parking along Paki.
- p. 4: 9. Reconstruct Parking Lot - **NO**. **This lot should be removed entirely** and left to open space. It was built for a golf driving range that was determined by the court to be an illegal use of the park trust land. The golf range was removed, but somehow the lot remained. It sticks out like a sore thumb into the park's great open space. **The central area of the park should not have a parking lot in it**. There would seem to be no justification for a parking lot of this nature in a master plan.
- p. 4: 10. Acquire lost residential lots - **absolutely** - they are a part of the original park lands and should never have been sold off!
- p. 4: 11. Base-yard facelift - preserve the significant architectural exterior of H. S. Bent's architecture and renovate interior as needed.
- p. 4: Land Tenure: The following sentence should be added at the end: "The paper road extension of Leahi Avenue between Noela and Poni Moi is now city land, donated to the city by KPPS."
- Comments on figure 3:
  - Zoo entrance area - retain the Preis building, remove kiosk, add set back makai Monsarrat corner of zoo fence to permit views into the great Park open space from Kalakaua/Kapahu corner, as an exchange for the open space encroachment of the new zoo entrance into the Park's open space. (The set back of this corner of the fence has been approved by the Director of the Department of Enterprise Services.)
  - Acquire remnant lots - very good.
  - **Remove**, not reconstruct, the parking lot opposite Paki Hale.
  - Bike/Moped parking should be added only on space in existing paved parking areas - **No additional paving of Park land for vehicles**.
  - Existing tree nursery and equipment base yard exists in violation of court order requiring its removal. (See the 1991 court order.)

**Keep the Park's traffic circulation pattern as it is. Alternative plans A - D (fig 13-16) are unacceptable and alter the historic character of the Park.**

In addition, the proposed accessibility improvements on Poni Moi Road are not acceptable, as they pose traffic hazards on Poni Moi with its heavy school traffic. It would be better to remove the archery range to a park or parks elsewhere on the island than to ruin the aesthetics of the area and waste money building parking areas and walkways in this beautiful grassy area.

- Comments on figure 4:
  - The latest site plan is not shown. The plan shown is not acceptable as the zoo entrance intrudes too far into the Park. The revised plan (not



shown) which places the shop and entrance on an angle and moved back to be mostly within the zoo area is acceptable.

- Comments on figure 5:
  - This shows the archery range taking up a huge area when, in fact, its size is about 1/4 the area shown. The area is mostly a picnic area - and should be labeled as such - with a small area for archery. The archery use is potentially dangerous and **best relocated to a less-used park** elsewhere on the island. The **new Koko Head Crater range** is an excellent example of a proper location, and the City could be considering moving archery facilities for East Honolulu entirely to that location. Thus, archery should probably be eliminated from the long range master plan.
- Comments on figure 6:
  - The parking lot opposite Paki Hale looks like a mistake on the plan and it is! The lot should be removed.
  - P. 19: part H: Flora - there is no mention of one of the Park's oldest and most character-full trees - the kiawe. As **one of the original trees in the Park**, existing plantings of Kiawe need to be cared for and young thornless kiawe need to be added, particularly to dryer areas of the Park.
  - The Vehicle Parking Issue In General:
    - The number of parking spaces in the Park was set at the current number by court order subsequent to the Supreme Court ruling that re-established the Kapiolani Park Trust. The limitation was designed to keep the Park from turning into a parking lot for Waikiki.

Due to the death of a child on the curve in Paki Road near the tennis courts, and subsequent to the court order, a new parking lot was added into the central part of the Park (opposite the tree nursery) with the justification that parking was not being increased, just relocated off the dangerous curve in the road. In actuality the new lot contained more spaces than those "removed" from the curve in the road. To make matters worse the police seldom ticketed cars illegally parked on the curve and so the cars went right back into that area of the road, so that the dangerous conditions remain.

The Master Plan's contemplated road improvements are necessary, yet on the plan on page 37, corner parking appears in the left corner of the drawing of Paki Avenue improvements. **There should be no street parking on that dangerous corner.** The diagonal parking also appears to create safety problems on this busy road.

The existing additional parking spaces in the new lot created by the city across from the tree nursery more than make up for the parking lost along the dangerous curve, and also provide enough spaces for the replacement of the parking lot opposite Paki Hale. Thus there is **no justification** for retaining and reconstructing the lot across from Paki Hale since **those spaces have already been accounted for** in the new lot.

In general, the parking spaces in the Park are poorly administered by the city, resulting in a constant pressure to pave over more of the Park for vehicle parking. For example, much of the zoo parking lot is used by Waikiki visitors and employees who enjoy the inexpensive parking meter rates there. Many Waikiki shop and hotel workers park in the Waikiki Shell area for free during the day, depriving actual park users of its use.

Parking lots fill up on weekends with salespeople and patrons of commercial activities in the Park (sales that KPPS maintains are contrary to restrictions of the Kapiolani Park Trust), once again depriving Park users of places for their cars.

KPPS supported bus rapid transit service to the Park to provide public access to the park without destroying more areas for parking.

Many of the soccer families who use the Park want to park their cars right next to the soccer field, rather than save the Park land by walking an extra hundred yards to a sports field from the parking areas at the Waikiki Shell area where there is adequate parking on weekday afternoons.

Please note that Page 41 of the report is missing, and that the report needs the most recent revised site plan for the zoo entrance.

Thank you for your attention to these matters directly affecting our beloved Park, a sorely needed green oasis in our urban Honolulu, enjoyed by residents since territorial times and a historical treasure. We look forward to working with you on this.

Sincerely yours,



Alethea Rebman

President

Kapiolani Park Preservation Society

cc: Lester Chang, C&C Department of Parks & Recreation  
Mike Smith, C&C Department of Parks & Recreation  
Councilmember Charles Djou  
Representative Scott Nishimoto  
Senator Les Ihara, Jr.



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April 10, 2008

Alethea Rebman, President  
Kapiolani Park Preservation Society  
PO Box 3059  
Honolulu, Hawaii 96802

Dear Ms. Rebman:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank for reviewing the Draft Environmental Assessment prepared for the subject project. We offer the following responses to your comments in the order that they were presented.

The Department of Design and Construction refers to Kapiolani Park as Kapiolani Regional Park because it encompasses land that was added to the original Park area by the City and County of Honolulu.

The document is an Environmental Assessment for the Kapiolani Regional Park Master Plan Update. It is not the master plan.

The Master Plan for Kapiolani Regional Park is shown in Figure 3 and is labeled as such. Figures 11 and 12 are "typical" depictions of what two selected improvements could look like.

p.2.1. Zoo Entrance. The City has made some minor adjustments to the plan for the new Zoo Entry shown in Figure 4 of the Draft Environmental Assessment (DEA). Please refer to the Figure 4 published in the Final Environmental Assessment (FEA).

p.2.2. Paving the walkways with a softer material can be considered during the design of the walkway improvements.

p.2.3. Replace Softball Field. Elks Field has been removed and converted to passive recreation use. This was undertaken as a public safety action as the existing field was substandard and continued softball play presented a potential danger to park users and property.

p.2.4. The use of portable or temporary backstops for the softball fields was noted in the DEA.

p.3.5. Accessibility improvements will make areas of the park accessible to all, as required by current federal and State laws and regulations.

p.3.6. Bicycle and moped parking areas may entail a net increase in overall pavement area. If there is any increase, it will be minimal and serve to organize the parking of bicycles and mopeds and discourage grassy areas from being adversely impacted by them.



Kapiolani Park Preservation Society

April 10, 2008

Page 2

p.3:7. Underground Utilities. Your statement of opinion in support of this proposal is acknowledged.

p.3:8. Paki Avenue Improvements. Your statement of opinion concerning parking along Paki Avenue is acknowledged. However, to support the current activities taking place at the Park, the Master Plan needs to preserve the same overall number of parking spaces lest it inadvertently encourage additional illegal parking on City streets in the future.

p.4:9. Reconstruct Parking Lot. The existing parking lot *makai* of Paki Hale will be redesigned and reconfigured but not expanded in coverage. Your statement of opinion in opposition to the existence of this parking area is acknowledged. Also, please see the comment to "Paki Avenue Improvements" above regarding the need to preserve the overall number of parking spaces for the Park.

p.4:10. Acquire residential lots. The residential lots would be acquired only when they become available. The City has also adopted policies involving property tax incentives to encourage owners of certain properties desired by the City to be willed to the City while they are alive. The properties are then taken over by the City for park use upon the death (s) of the owner (s).

p.4:11. Base-yard Facelift. Your recommendation regarding the architecture of the maintenance building is acknowledged. The City will take it under advisement in future Park planning.

p.4:D. Land Tenure. The sentence will be added to the section on Land Tenure.

Comments on Figure 3.

Zoo Entrance Area:

The Preis-designed building will be retained and the kiosk at the corner of Kapiolani and Kalaheua Avenues is proposed to be removed. Please see our response to the comment to page 2:1 above.

Acquire Remnant Lots:

The remnant lots will be acquired only when they become available. Please see our response to the comment to page 4:10 above.

Parking Lot:

The Master Plan Update proposes reconstructing and reconfiguring the parking lot but not expanding its coverage. Please see our response to the comment on page 4:9 above.

Bicycle/Moped Parking:

Four areas for bicycle/moped parking are proposed to be constructed at selected locations in the park. Please see our response to the comment to page 3:6 above.



**Existing Tree Nursery:** The vehicles parked at the Kapiolani Park nursery grounds are used for nursery purposes, compliant with the 1991 Court Order. Siting of the nursery on trust property was permitted by the Court so long as the nursery and the plants were used for City park purposes.

Your statement of opinion in opposition to the traffic circulation alternatives analyzed in the DEA is acknowledged. Alternative Circulation Plans A through D were dropped from consideration for reasons stated. The existing circulation pattern will remain as is.

Accessibility Improvements at Poni Moi Road. Your comment does not indicate why you believe accessibility improvements pose traffic hazards on Poni Moi Road. Therefore, a response cannot be offered to your comment.

Comments on Figure 4.

The FEAs will contain a revised Figure 4 with a plan for the new Zoo Entry showing the Zoo Shop orientation turned approximately 45 degrees and the fence line altered, as requested by the Director of the Department of Enterprise Services (DES).

Comments on Figure 5.

Your statement of opinion regarding the archery area is acknowledged. As indicated in the DEA (page 10), "The area references are intended only to facilitate an orderly description of the diverse areas making up the Park". Figure 5 graphically depicts the various areas described in the park including the existing archery range.

Comments on Figure 6

Figure 6 depicts existing conditions at the park. Please see our response to the comment to page 4:9 above.

p.19: part H: Flora. Kiawe is mentioned on the second line of the first paragraph under item H. Flora.

Vehicle Parking Issue in General.

Thank you for your observations and comments about parking on Paki Avenue and in the Park. The City will take it under advisement in future Park planning and current operations. The Park Master Plan Update has complied with the court's stipulation that there should be no general increase in parking spaces beyond what currently exists.

Due to a clerical error, page 41 was not printed and inserted in the DEA. A replacement page was mailed to the Kapiolani Park Preservation Society.

The participation of the Kapiolani Park Preservation Society in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC



POLICE DEPARTMENT  
CITY AND COUNTY OF HONOLULU  
801 SOUTH BERETANIA STREET - HONOLULU, HAWAII 96813  
TELEPHONE: (808) 529-3111 • INTERNET: www.honolulu.gov



MUFI HANNEMANN  
MAYOR

OUR REFERENCE BS-DK

BOISSE P. CORREA  
CHIEF

GLEN R. KAJIYAMA  
PAUL D. POIZIBLU  
DEPUTY CHIEFS

June 29, 2007



Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
Honolulu, Hawaii 96814

Dear Mr. Park:

This is in response to your letter of May 31, 2007, requesting comments on a Draft Environmental Assessment for the Kapiolani Regional Park Master Plan Update project.

This project should have no significant impact on the facilities or operations of the Honolulu Police Department.

If there are any questions, please call Major Randal Macadangdang of District 6 at 529-3361 or Mr. Brandon Stone of the Executive Office at 529-3644.

Sincerely,

BOISSE P. CORREA  
Chief of Police

By   
JOHN P. KERR  
Assistant Chief of Police  
Support Services Bureau

*Serving and Protecting With Aloha*



April 10, 2008

GERALD PARK  
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Boisse P. Correa, Chief of Police  
Honolulu Police Department  
City and County of Honolulu  
801 S. Beretania Street  
Honolulu, Hawaii 96813

Dear Chief Correa:

Subject: Kapiolani Regional Park Master Plan Update  
BS-DK

Thank you for your letter stating that the Kapiolani Regional Park Master Plan Update project should have no significant impact on the facilities and operations of the Honolulu Police Department.

The participation of the Honolulu Police Department in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER



Gerald Park

c: T. Hildebrand, DDC

July 5, 2007

received  
7.5.07

Mr. Gerald Park, Urban Planner  
#211  
1221 Kapiolani Boulevard  
Honolulu, Hawaii 96814

Dear Mr. Park:

We thank you for the opportunity to comment on the information shared in the Honolulu Advertiser of this date regarding plans for upgrading Kapiolani Park and addressing parking on Paki Avenue.

The Park is well used. On many days parking on Paki Avenue is very heavy. Therefore, how will providing less parking space improve the situation? Is the Park not in existence to be used by all residents? If it is, how will the users access it if not by automobile? It would seem prudent to pursue a plan to facilitate safe and adequate parking for those who wish to use the Park, rather than curtailing currently available space which, during many days of the year, is inadequate.

Burying power lines and widening sidewalks would indeed be a positive undertaking. Granted, we realize bus service exists, but park usage generally involves carrying equipment; therefore, most users arrive by their own transportation. For the countless number of residents that use this Park focus should be directed to making it as user-friendly as possible.

Thank you for your consideration of our concerns.

Sincerely,

Richard and Elizabeth Kamis  
kamii@hawaii.rr.com



April 10, 2008

Richard and Elizabeth Kamis  
kamii@hawaii.rr.com

Dear Mr. and Mrs. Kamis:

Subject: Kapiolani Regional Park Master Plan Update  
Walkiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the information about the Kapiolani Regional Park Master Plan Update in the Honolulu Advertiser. We offer the following response to your comments in the order that they were presented.

The Master Plan Update does not propose to reduce the number of legal parking stalls available for park users. Your comments about Paki Avenue indicate that you are aware of the crowded parking conditions along the road during many days of the year. Many of the cars parking along the road do so in areas where parking is not legally permitted. Precluding the use of these areas will reduce the number of vehicles that can park but those vehicles should not be parking where parking is not permitted to begin with.

The proposed parking and street improvements are intended to make Paki Avenue a safer street environment for motorists, pedestrians and joggers, bicyclists, and park goers in general.

The goal of all of the proposed improvements is to make the park experience more "user-friendly", safer, and accessible for all who visit and recreate here.

Your participation in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK, URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC

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Honolulu, HI 96813  
le 05.VII.07

Terry Hildebrand  
Dept. of Design & Construction  
650 S. King Street  
Honolulu, HI 96813



Dear Sir, RE: Honolulu Zoo entrance

You guys must never go to the zoo or do any research because, if you did, you would know you have the wrong end of the stick!

As everyone else knows, the entrance to the Zoo should be on Monsarrat, exactly across the street from The Bus stop, with an adjoining crosswalk for the following reasons:

1. Tourists traveling to Diamond Head, Sea Life Park, or Hanauma Bay, by The Bus, taxi, or rented vehicle, will see the entrance to the Zoo and either break their journey or make a return visit to the Zoo.
2. Mothers taking their children to the Beach or a Kapi'olani Park event give their children a break from the sunshine by taking them to the Zoo, and would much rather their children walked IN the Zoo, than up and down the street trying to find the entrance!
3. Zoo traffic is removed from Kapahulu to Monsarrat Avenue, opening up parking to beach users and providing more accessible parking to Zoo patrons. It also facilitates delivery and pick-up for the many Zoo visitors arriving by school, military, or tourist buses.
4. A Monsarrat entrance allows cross-benefits between Kapi'olani Park events and the Zoo, i.e., people going to events will see the easy access to the Zoo, and people going to the Zoo will see the easy access to the Kapi'olani Park event.
5. Mothers who travel by The Bus will bless you for making it easier to take their children to the Zoo!

I can't see ANY benefit at all to Zoo visitors by putting the entrance on Kapahulu; you clearly have no idea how dramatically that will REDUCE Zoo attendance!

Yours sincerely,

  
Rico Leffanta

CC: Gerald Park ✓



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April 10, 2008

Rico Leffanta  
626 Coral Street, #807  
Honolulu, HI 96813

Dear Mr. Leffanta:

Subject: Kapiolani Regional Park Master Plan Update

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

The proposed New Zoo Entry plan is to move the entrance closer to the zoo parking lot to make it more convenient to the majority of zoo patrons who can park their vehicles in the nearby parking lot and walk to the zoo and to improve the visibility of the zoo for residents and visitors.

Moving the entrance to Monsarrat Avenue requires an extensive planning and design effort affecting the entire facility. Further, there is limited on-street parking available on Monsarrat Avenue and no convenient off-street parking for patrons driving to the zoo. Parking in the Waikiki Shell parking lot would tie-up stalls set aside for park goers and the entrance would be less visible from the more heavily traveled Kalakaua and Kapahulu Avenues. In addition, a Monsarrat Avenue location would require people to cross a street thus creating a potentially unsafe condition for pedestrians.

Your participation in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER



Gerald Park

c: T. Hildebrand, DDC

DEPARTMENT OF PARKS & RECREATION  
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapiolani, Hawaii 96707  
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MUJI HANNEMANN  
MAYOR

LESTER K. C. CHANG  
DIRECTOR  
DANA L. TAKAHARADIAS  
DEPUTY DIRECTOR

July 2, 2007



Mr. Gerald Park  
Urban Planner  
1221 Kapiolani Blvd., Suite 211  
Honolulu, Hawaii 96814

Dear Mr. Park:

Thank you for the opportunity to review the Environmental Assessment Draft of the Kapiolani Regional Park Master Plan (Draft).

The Department of Parks and Recreation (DPR) is in agreement with the proposed improvements as outlined below:

- DPR has no comment regarding the Honolulu Zoo Entrance. If you have not already done so, please send a copy to the Department of Enterprise Services.
- Walkways Widening – this improvement is needed and will enhance public access and enjoyment.
- Softball Field Replacement – the field is already out of service and is in the process of being converted into a passive picnic site.
- Modification of Existing Softball Fields – the proposed realignment would improve future use of the fields and allow for use of temporary backstops as necessary.
- Accessibility Improvements – recommended ADA improvements are agreeable.
- Bicycle and Moped Parking – the Draft addresses this concern well.
- Underground Overhead Utilities – this will meet the approval of the community as well as DPR.
- Park Avenue Improvements – retention of the present vehicular circulation pattern is the most practical. The recommended Park Avenue improvements would enhance the circulation, improve parking conditions and facilitate maintenance activity.
- Reconstruction of Parking Lot – this would benefit the 48-stall parking lot makai of Paki Hale in terms of better drainage and improved parking for park users.
- Acquisition of Residential Lots – this would increase the effective use of Kapiolani Regional Park to the benefit of all park users.

Mr. Gerald Park  
Page 2  
July 2, 2007

- Maintenance Baseyard Renovation – this is a much needed improvement to address maintenance requirements, as well as, preserving the historic nature of the facility in relation to the park.

Should you require further information, please contact Ms. Marcia Michel, Acting Kapiolani Regional Park Manager, at 971-2510.

Sincerely,

LESTER K. C. CHANG  
Director

LKCC:fe  
(2/11/80)

cc: T. Hildebrand, DDC



April 10, 2008

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Lester K.C. Chang, Director  
Department of Parks and Recreation  
City and County of Honolulu  
1000 Uluohia Street, Suite 309  
Kapolei, Hawaii 96707

Dear Mr. Chang:

Subject: Kapiolani Regional Park Master Plan Update

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. The support of the Department of Parks and Recreation for the proposed improvements is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC





# THE OUTDOOR CIRCLE

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received  
7.9.07

July 9, 2007

Mr. Terry Hildebrand  
City and County of Honolulu  
Department of Design and Construction  
650 South King Street  
Honolulu, HI 96814

RE: Draft Environmental Assessment  
Kapiolani Regional Park Master Plan Update

Dear Mr. Park:

Thank you for consulting with The Outdoor Circle on the above referenced project. Below you will find our questions and comments regarding the Draft Environmental Assessment (DEA).

- Please include in the DEA tree protection plans and indicate that a qualified arborist will be present whenever construction is done near the trees, their canopies or their roots. This tree protection plan should be followed throughout the life of this Master Plan and so stated in the document.
- We also are concerned that the widening of the walkways will impact trees and their roots. The DEA should include a commitment that the walkways will be designed and built to avoid all tree roots and when this is not possible the tree will take precedence.
- The plan in the DEA shows 11 Exceptional Banyan trees but a recent list (by location) indicates 12 trees. Please reconcile the plan with the list published in the County ordinance. Also please correct your plan to show that the Earpod tree inside the zoo has been removed. Also include on the list of permits required an Exceptional Tree permit.
- We applaud and offer our full support for the plan to underground overhead utilities. However, as stated in the DEA the routing of the utilities must be studied to avoid damage to the tree roots. The document states on page 34 "A certified arborist should be retained to recommend measures for root pruning and for protecting root systems." That statement must be revised to read that a certified arborist "will" be retained.
- The DEA states that "Existing trees shall remain unless they are dead, dying or diseased in which case they should be replaced." The Outdoor Circle believes that the DEA should commit to having a qualified arborist prepare a tree hazard assessment of any trees where removal is being considered and that a replacement tree should be of the same species as the one being removed. Also, The Outdoor Circle would like to be consulted before tree removals are done and this should be included in the DEA as well.
- Figure 3, titled "Kapiolani Regional Park" shows the trust boundaries and includes the Natatorium within the project. We believe that the DEA should include the plans for the Natatorium improvements. One of the reasons for this is to include future plans for parking. At a recent community meeting about the Natatorium the need for parking was discussed. To add more parking later while still being within the park's boundaries would be considered project segmentation. In order to do a complete

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- evaluation for the need for more parking in Kapiolani Park, details about the parking plans must be provided.
- Page 3 of the DEA states, "All on-street parking areas will be clearly striped. The recommended parking arrangement aids in protecting the existing street trees and their root systems from damage." Please explain how this is so.
  - We believe that the Ironwood trees provide habitat for the white tern and not the sooty tern as stated on page 14 and listed again on page 20. Please make the correction if needed.
  - Please indicate why Historic Hawaii Foundation was not listed as an organization to be consulted during this process. As a historic landscape that organization should have been included on the list provided on page 48.
  - Please provide a Cultural Impact Assessment with this DEA.
  - Finally, we would like to suggest that this Master Plan include a sunset date for implementation. We believe that projects undertaken after that date should be reassessed and evaluated using the Environmental Impact Assessment.

### Alternatives to the Proposed Action

We do not understand why the proposed alternatives concern traffic circulation when circulation is not addressed as part of this proposed action. Please provide your basis for selection of the preferred alternative.

### Conclusion

Before a finding of no significant impact is granted for this project we believe that further study of the impacts should be made. These studies should include an analysis of the project based on its impacts on the cultural and historic resources the park provides. In addition, further study should be made regarding the project's impacts on the hundreds of Exceptional trees (and others) in the park.

Thank you for accepting our comments.

Sincerely,  
  
Mary Stepher  
CEO

CC:   
Office of Environmental Quality Control



April 10, 2008

GERALD PARK  
Urban Planner

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Mary Steiner, CEO  
The Outdoor Circle  
1314 South King Street  
Suite 306  
Honolulu, Hawaii 96814

Dear Ms. Steiner:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. We offer the following responses to your comments in the order that they were presented.

Please note that the Draft Environmental Assessment (DEA) is a disclosure document. Many of your concerns will be addressed in the master plan document.

1. Kapiolani Regional Park is within the Diamond Head Special District and subject to its provisions, including the preservation of existing trees and palms. The protection of trees and palms during construction, including the presence of a qualified and certified arborist, is addressed in the existing park management plan.

2. It is anticipated that the improvements will be designed to avoid trees in the park as much as possible. In cases where there are conflicts a qualified and certified arborist will be retained prior to or during construction to advise the City and the contractor of appropriate measures to protect root systems.

3. Figure 3, Master Plan, will be revised to show 12 rather than 11 Exceptional Trees. The Honolulu Zoo is not part of the Master Plan Update. The master plan does not affect any Exceptional Tree. However an Exceptional Tree Permit application process will be adhered to, should the need arise.

4. The Final Environmental Assessment (FEA) will be revised to state that a certified arborist will be retained. Please see the response for Item 1 above.

5. A tree replacement plan, similar to a tree protection plan, is more appropriately addressed in the park management plan. The Outdoor Circle shall be consulted by the Department of Parks and Recreation (DPR) on recommending appropriate replacement trees or palms for Kapiolani Regional Park. It is the practice of the DPR to consult with community interest organizations such as yours regarding tree removal and replacement.

6. No changes to the Waikiki Natatorium are being contemplated in the Master Plan Update currently under consideration. A separate study is currently being undertaken to resolve the issue of the deteriorating Natatorium structure and determine other appropriate future uses and improvements, including parking. When


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the plans are completed and approved by the City, another update of the Kapiolani Regional Park Master Plan will be promulgated

7. Striping of on-street parking stalls will clearly identify where on-street parking is permitted. Without the striping, vehicles would continue to park haphazardly to include parking atop or near tree roots which could damage the tree.
8. It has not been confirmed whether the ironwood grove supports habitat for the sooty tern, a common bird species, or the white tern, a listed endangered species in Hawaii. The ironwood grove will not be directly disturbed during construction since there are no overhead lines passing through the grove along Kalakaua Avenue. Overhead lines that pass just to the north of the grove can be removed or placed underground without disturbing the trees and bird nests. Construction can be scheduled to coincide when the birds are not in their nesting season if they indeed nest in the ironwoods.
9. Through an oversight the Historic Hawaii Foundation was not on the mailing list prepared for distribution of the DEA. The availability of the DEA was published in the Office of Environmental Quality Control (OEQC) *Environmental Notice*, as required by law. Presumably, the organization should have been aware of the DEA if it regularly monitors the OEQC publication. The Historic Hawaii Foundation will be provided a copy of the Final Environmental Assessment.
10. The proposed master plan improvements occur within existing areas that have been previously disturbed by park development. The DEA discloses on pages 20 and 34 cultural and historical aspects of the Park and what actions will be taken in the event any earthwork inadvertently uncovers archaeological features or remains.
11. The implementation of proposed improvements is dependent on available funding. The next master plan update shall address improvements not undertaken under this master plan and determine if they should remain, be revised, or removed. The sunsetting of the proposals in the Master Plan Update goes well beyond the requirements of the law. Given the vagaries of the public funding and permitting processes, compliance with your suggestion could hamstring the City's ability to implement any future improvement project in the Park.

Alternatives to the Proposed Action

Transportation alternatives were considered early on in the master planning process because of potentially significant impacts to the Park as a whole, including recreational uses and circulation patterns. It was determined that circulation changes would have had considerable environmental impact on vehicle circulation patterns on streets adjoining the park and possibly affect vehicle circulation in neighborhoods beyond the limits of the park such as Waikiki, Kapahulu, and Diamond Head.



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The Master Plan Update proposes no changes in overall traffic circulation around the Park. The proposed reconstruction of Paki Avenue with associated edge treatment would improve rather than change traffic circulation patterns along that roadway.

Conclusion

Your statement of opinion is acknowledged concerning additional studies that you desire related to cultural and historic resources and to the impact on the Park's Exceptional Trees. The City, however, does not concur with that view. These issues have been adequately addressed in the Master Plan Update process and this DEA. Overall, the proposed Master Plan improvements to the Park are modest in nature and limited in scope. No major new structures are being proposed, nor any changes in functions or recreational uses within the Park.

The participation of the Outdoor Circle in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

  
Gerald Park

c: T. Hildebrand, DDC

# Hawaii's Thousand Friends

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July 3, 2007

Gerald Park Urban Planner  
1221 Kapiolani Blvd. Suite 211  
Honolulu, Hawaii 96814

Terry Hildebrand  
Department of Design and Construction  
Facilities Division, Planning Branch  
City and County of Honolulu  
650 South King Street, 9th Floor  
Honolulu, Hawaii 96813



RE: Environmental Assessment Kapiolani Regional Park Master Plan Update

Hawaii's Thousand Friends has the following questions and comments regarding the proposed development contained in this master plan update.

We disagree with the Anticipated Finding of No Significant Impact. As an historical site any construction within Kapiolani Park should be considered significant especially when taking into consideration the cumulative impact of the amount of construction being proposed.

It is our understanding that prior to the deadline of July 9 to submit comments to Gerald Park Urban Planner, the Department of Design and Construction, the accepting authority and proposing agency, accepted the DEA and issued a FONSI.

1. What date was the DEA accepted by DDC?
2. What date was the FONSI issued?
3. What section(s) within DDC accepted the DEA and issued the FONSI prior to receiving public comments.
4. Explain the process used to determine the issuance of a FONSI prior to receiving public comments.

While the DEA asserts that this Master Plan Update does not propose major changes to the "historical theme" envisioned by the 1983 Master Plan the document does not provide any information on the "historical theme". Lacking this information it is impossible for a respondent to assess potential impacts the proposed improvements will have on the "historical theme".

The DEA states that in 1992 an "interim" master plan was prepared by the Dept. of parks and Recreation and served as an interim guide to park improvements.

1. What projects are contained in the 1992 "interim" master plan?
2. How is the 1992 "interim" master plan different from the 1983 master plan and this 2007 master plan update?
3. Is this DEA an update to the 1983 master plan or the 1992 "interim" master plan?

4. What "improvements" were done under the 1992 "interim" master plan and was an EA prepared and accepted for those improvements? If not, please explain why?

## Honolulu Zoo Entrance

The DEA introduction mentions that the Honolulu Zoo and Waikiki Shell are "not include in Master Plan Update and excluded from DEA" yet page 2 mentions a "new entrance to the Zoo" but that "detailed plans for the improvements have not been prepared".

1. It is incorrect to state that the Zoo is not included in the Master Plan since pg. 5 gives the cost of \$3,000,000.00 for the Honolulu Zoo entrance, pg. 2 Honolulu Zoo Entrance and Figure 4 Zoo Entry Improvements identify extensive improvements including: a new 2,500 sq. ft. single-story building entrance, new zoo shop, new restrooms, entry court, realigned and redesigned wider (6 to 10 feet wide) walkways, new zoo and park sign and removal of existing information kiosk.
2. Figure 4 is identified as "A preliminary Site Plan" but the purpose of the plan is unclear because other than a schematic drawing showing "typical improvements" the plan does not provide any data on the dimensions of buildings, walkways, trellis, size and location of the new sign or give information on how the new structures and widened walkways will impact trees and open space.

- a. What is the purpose of Figure 4?
  - b. What does "Zoo Entry - Typical Improvements", mean? Is this the Zoo Entry Improvement Plan for what is to be constructed or just a schematic drawing of what could be build?
  - c. If it is the Zoo Entry Plan then it must be more specific. If it is just a schematic drawing then it should be eliminated from the FEA.
3. The reasons given for the proposed improvements are the need for greater "visibility" and "accessibility" into the zoo.
- a. Was a needs assessment conducted to determine that the need for greater visibility and accessibility?
  - b. If an assessment was conducted the results should be included in the FEA?
  - c. If an assessment was not done explain how the conclusion was reached that these improvements are necessary.

## Walkways Widening

1. What are the dimensions of the existing concrete walkways that are to be widened? The DEA fails to provide this information.
2. The DEA states that walkways will be widened to a minimum of 8-foot but fails to provide information on the maximum footage. What is the maximum width for the mauka side of Kalakaua Avenue and the Diamond Head side of Monsarrat Avenue?
3. The first paragraph states "the walkway" does not meet Americans with Disabilities Act standards for outdoor recreation areas but does not identify the location(s) of "the walkway" that does not meet ADA.
4. The DEA does not contain a "walkway design" plan but suggests, "the final walkway design should consider its alignment and alternative paving materials." Without a walkway design plan that provides dimensions, locations and paving materials it is impossible to assess potential impacts on the environment from the additional concrete needed for the larger walkways.

**Softball Field**

1. Was a needs assessment conducted to evaluate the impacts on users if the existing Elks Field is removed? If so, that assessment should be made part of the FEA.
2. If an assessment was not done how was it determined that the softball field should be removed?

**Accessibility Improvements**

1. Are all areas and facilities within an historic site required to meet ADA requirements?

**Bicycle and Moped Parking**

1. Are the proposed parking areas new or existing?
2. What are the dimensions of the parking areas?
3. How many parking areas are proposed?

**Underground Overhead Utilities**

1. The DEA recommends undergrounding overhead utility systems along Kalakaua Avenue, Monsarrat Avenue, and Paki Avenue. The DEA fails to provide definitive information making it impossible to evaluate impacts to the environment from this activity.
2. What are the impacts to the natural environment, open space, existing trees and other landscaping from underground overhead utility systems as proposed?

**Paki Avenue Improvements**

1. As a disclosure document this DEA fails to recommend design treatments appropriate for an historic site. Instead the proposed "improvements" will make historic Paki Avenue look and feel like just another urban street. It is not sufficient to suggest, "alternative design treatments should be considered in the final design. The FEA must recommend alternative design treatments that recognize and appreciate the historical nature of Paki Avenue.
2. What is meant by "clearly defined improvements at the road edge?"
3. What are the potential impacts to trees and their root systems from the proposed undefined "improvements" and widening of Paki Avenue?
4. The DEA does not mention the width of the existing walkways nor does it state why the undisclosed width is inadequate. What is the current width of the walkway and how was 10-12 feet selected as the correct width?
5. What is the purpose of realigning the walkway?
6. Without specific dimensions - current and proposed width, length and location of walkways, it is impossible to assess impacts to open space and trees. This information must be provided in the FEA.

**Reconstruct Parking Lot**

1. How many new parking stalls will be added to the reconstructed parking lot?
2. What are the current dimensions of the parking lot and what are the dimensions of the proposed reconstructed lot? Without knowing the current and proposed size of the parking lot it is impossible to evaluate any potential impact on the environment.
3. This information must be presented in the FEA

**Acquire Residential Lots**

1. The DEA fails to provide any information on the social and environmental characteristics of the purchase of residential lots making it impossible to evaluate potential social and environmental impacts.
2. This information must be provided in the FEA.

**Figure 3 Master Plan**

1. The Natatorium Site is identified for "improvements" yet there is not description of any improvements throughout this DEA. Will a separate EA be done for proposed improvements to the Natatorium site or will this DEA serve as the disclosure document for "to be determined" improvements at the Natatorium?
2. The Master Plan directs the reader to see "detailed Plan" for both the new zoo entrance and widened walkways but there are no "detailed" plans only vague generalities such as "the final walkway design should consider its alignment and alternative paving materials" or "an existing information kiosk at the corner of Kalakaua and Kapanulu Avenues will be demolished" and replaced with new signage but there is no information on size or location of the sign or discussion of the sign in relation to Kahi Hail'a Aloha Monument.

**Figure 11**

1. The proposed improvements to widen the path by replacing green grassy areas with concrete destroys the natural look and feel of the park and gives historic Kapiolani Park an urban look and feel.
2. Statements such as "replace existing walk with widened path" do not describe what will be done or where it will occur. How wide will the concrete "pathway" be? The FEA must provide a description of the areas that will be cemented to the curb and identify location.
3. What are the environmental and water quality impacts when the grass that acts as catchments for runoff and rainwater is replaced by concrete?
4. To maintain the open historical quality of Kapiolani Park and protect the environment and water quality the green grassy areas next to curbed areas should be retained.

**Short-Term Impacts - Site Work**

1. Finally the DEA acknowledges that there will be impacts on the environment but it is only a general statement referring to "construction activity." Nowhere does the DEA evaluate impacts to the environment from individual or cumulative construction activity and proposed developments.
2. This section further acknowledges that "significant adverse" impacts could occur from placing utility lines underground and reconstructing Paki Avenue but does not identify what those impacts are or could be. What are the impacts from undergrounding utility lines?
3. The DEA does not identify any environmental impacts from grading and grubbing of each site. What are the impacts to the surrounding environment and natural landscape from grading and grubbing for each project?
4. How much soil will be grubbed from each site/project?
5. Where will the dirt from each site/project be stockpiled or disposed of?
6. Will new dirt be brought in for the various projects? If so, describe how much soil will be brought in for each project and identify where the dirt will be stockpiled?
7. Where will the staging area(s) be for heavy equipment? The FEA must identify on a map where dirt and heavy equipment will be stored.

8. Not until page 32 is "installing new poles for street lighting" mentioned. How many old light poles will be replaced with new poles? Will existing light poles be relocated or removed? The FEA must identify which poles will be removed, replaced, relocated and where new poles will be located.
9. Where will the water and solids "on-site detention basins" be located? What are the environmental impacts from dewatering and constructing detention basins?
10. Since construction activity may exceed the Class A zoning district noise levels the contractor should set up a direct number telephone hotline so people can call with concerns. The contractor should meet with adjacent neighbors and the Waikiki Neighborhood Board prior to construction to answer questions and provide residents with the hotline telephone number. The contractor must meet periodically with residents and the Waikiki Neighborhood Board to provide progress and update reports.

#### Long-term Impacts

1. The reconstructing and redesign of historic Paki Avenue between Noela Drive and Diamond Head Road will have a long-term impact on the historical character of Kapiolani Park and could affect the eligibility for placement on the National Register of Historic Places.
2. Was a review of National Historic eligibility qualifications and standards conducted prior to determining that the proposed changes to the zoo entrance and Paki Avenue and addition of meandering walkways and solid concrete paths will not affect the Park's eligibility for listing on the National Register?

#### Figure 12

1. Not until page 37 is it mentioned that an "existing comfort station" will be replaced.
2. Where is the comfort station located?
3. Will it be larger or the same size as the existing comfort station?
4. Pg. 38 states that "The proposed improvements will not place additional demands on water and wastewater systems because facilities requiring water and sewer service are not proposed." Yet, Figure 12 states that an existing comfort station will be replaced. Will new stalls be added to the new comfort station? If so, how many and what is the impact on the sewage system?

**Pg. 38** states "In lieu of a drainage plan and to comply with City storm water quality policies, storm water would be directed to open space areas for percolation into the ground and evaporation or temporarily stored in on-site detention systems with controlled release to the municipal drainage system."

1. How will the runoff from the concreted "pathway" meet this requirement?
2. Will new on-site detention ponds and systems be created to handle additional storm water runoff? If so, where will they be located, what types of systems are being designed and what are the anticipated environmental impacts?
3. Why is a drainage plan not required?
4. What "other methods" are being considered for implementation and when will the types of systems be determined?

#### Alternatives to the Proposed Action

1. The alternatives A through D only deal with traffic circulation. The traffic alternatives do not take into consideration the historic nature of Paki Avenue or offer a solution appropriate to an historic site.
2. None of the alternatives provide alternatives to the proposed zoo entrance expansion including construction of a 2,500 sq. ft. structure, demolition of the kiosk, placement of the Zoo/Kapiolani Park sign, widening of walkways in front of the zoo, and throughout the park, concreting paths to the curb that are adjacent to streets, replacement and modification of existing softball fields, bicycle and moped parking, reconstruction of a parking lot, acquisition of residential lots and renovation of maintenance baseyard facility.
1. What is the difference between the Waikiki 2000 Kapiolani Park Master Design Plan, the 1983 Kapiolani Park Management Plan and the 1983 Kapiolani Regional Park Master?
2. Were archeological and cultural reviews conducted to ensure that no unexpected 'iwi or cultural sites are discovered during construction? If reviews were not conducted please explain why.
3. Is it correct that once a FONSI is determined then all items listed as "improvements" in this DEA are considered approved?
4. Are there "interim" plans within City departments that describe the "detailed plans" for the Honolulu Zoo entrance?
5. Page 47. It is not sufficient to recommend that "During the planning for any improvement within the Park, consultation should be initiated with the Department of Planning and Permitting to ascertain the applicability of the SMA Permit approve in 1983 to the improvement being proposed."
6. A new Shoreline Management Area Permit must be obtained for all the projects proposed in this Update. A Shoreline Management Area Permit issued in 1983, 24 years ago, could not possibly address the single and cumulative impacts from the projects proposed in this plan.
7. Was an archeological survey conducted?
8. It is imperative that the "improvements" in this DEA/Master Plan have a 10-year sunset date for implementation with projects not funded by the sunset date revisited for appropriateness and another EA conducted to evaluate the remaining projects.

The DEA is totally inadequate. It does not provide sufficient descriptions of the economic, social or environmental impacts from the various "improvements." It does not provide sufficient detail of each proposed improvement to enable a respondent to comment on potential environmental impacts. It does not consider the historical significance of Kapiolani Park in recommendations. It does not consider the potential threat to the eligibility status for placement on the National Register.

In conclusion, an Environmental Impact Statement must be required to ensure full disclosure and due consideration and recognition of the historic nature and importance of Kapiolani Park.



April 10, 2008

Hawaii's Thousand Friends  
25 Malunui Avenue, Suite 102  
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Kailua, Hawaii 96734

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. We offer the following responses to your questions and comments in the order that they were presented.

Draft Environmental Assessment and Finding of No Significant Impact

The Department of Design and Construction ("DDC") has not issued a Finding of No Significant Impact ("FONSI") for the Draft Environmental Assessment ("DEA") for the Kapiolani Regional Master Update. The DDC has issued an Anticipated FONSI based on their review of the DEA.

The 30-day public review period for the DEA commenced on June 8, 2007 and ended on July 9, 2007. The public review period allows the general public opportunity to submit written comments on the proposed action. After the close of the review period, the DDC will consider all comments received and their relevancy to the proposed action and then determine if a FONSI should be issued or whether an Environmental Impact Statement should be prepared.

The above process is prescribed in Chapter 343, Hawaii Revised Statutes and Hawaii Administrative Rules, Title 11, Chapter 200.

1992 Interim Master Plan

1. Major proposals contained in the 1992 Interim Master Plan included:
  - a. Esplanade and Beach Center at the beach area
  - b. A Park Center (Paki Hale)
  - c. Additional athletic fields
  - d. Additional tennis courts at the Tennis Center
  - e. New sidewalk and jogging path along Kalakaua Avenue between Kapahulu Avenue and Dillingham Fountain
2. Several proposals in the 1983 plan included:
  - a. Improvements to the beach area including the Waikiki Natatorium and Aquarium
  - b. Waikiki Beach pedestrian walkway
  - c. Waikiki bikeways along Paki Avenue
  - d. Improve Paki Avenue from Kapahulu to Diamond Head Road
3. The DEA is based on the Kapiolani Regional Park Master Plan Update prepared by Miyabara Associates dated November 30, 2006. The current plan updates the 1992 Interim Master Plan.



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4. Improvements constructed in the Park as proposed in the 1983 plan and the 1992 interim plan were reviewed and approved by the City's Department of Planning and Permitting (DPP) as required by City ordinances and rules and regulations. Records of these applications and the approval process are public record available through the DPP.

Honolulu Zoo Entrance

1. The Honolulu Zoo, as well as the Waikiki Shell, is administered by a separate City agency and was excluded from the Kapiolani Regional Park Master Plan Update. The New Zoo Entry, however, is included in the master plan because it occurs outside of the zoo facility and includes improvements within Kapiolani Regional Park.
2. Figure 4 is a preliminary site plan. The intent of the drawing was to indicate the approximate siting of the entry building and accessory improvements such as walkways and overhead trellises. This is considered a sufficient and reasonable level of detail on which to base our analysis concerning the anticipated impacts of the proposed improvements for environmental disclosure purposes.

The site plan has since been revised and the current plan will be included in the Master Plan Update. Concerns regarding the impact on existing trees have been addressed during the design process.

3. It has long been recognized that the existing entrance is not optimal in terms of visibility and wayfinding. A new entry for the zoo was proposed in the Honolulu Zoo Master Plan (Jones and Jones, 1983) and disclosed in the Environmental Assessment for the Honolulu Zoo Master Plan (Beit Collins Hawaii, 2000).

The major deviation from the 1992 Master Plan and subsequent updated plans for the zoo is that the existing entrance building will be left in place (although re-used for a different purpose). All previous plans identified that the existing entrance would be removed.

The assessment of park needs has been made by Department of Parks and Recreation (DPR) and Zoo administrators based upon their daily interaction with users and their professional experience.

Walkways Widening

1. The typical walkway along Kalakaua Avenue is 4-feet wide; the typical walkway on the park side of Monsarrat Avenue is 8-feet wide.
2. The maximum width will vary depending on site conditions in the two areas identified in your comment. The Master Plan Update recommends a minimum width of 8-feet for multi-use.



3. The walkways on the mauka side of Kalakaua Avenue and on the Diamond Head side of Monsarrat Avenue do not meet Americans with Disabilities Act (ADA) outdoor recreation standards. In addition, any walkways or conditions throughout the park that do not meet current ADA guidelines shall conform to those standards.
4. The Master Plan Update identifies and delineates the location and alignment of future walkways. Detailed walkway design and construction documents shall be prepared for the specific project. The final design shall consider existing drainage patterns, existing trees and palms, and material selection. It is anticipated that construction will affect only the top surface of the existing grade.

Softball Field

1. Elks Field already has been removed and converted to passive recreation use in the master plan. This was undertaken at the request of the DPR administrators as the existing field is substandard and continued softball play presents a potential danger to park users and property.

Accessibility Improvements

1. Generally, all areas and facilities within a historic site are required to meet ADA requirements to the extent that the area and facilities are open for public use.

Bicycle and Moped Parking

1. The proposed bicycle and moped parking areas would be new areas.
2. The dimensions are 20 feet by 20 feet as stated in Section 1, page 3 of the DEA.
3. Four parking areas are proposed.

Underground Overhead Utilities

1. The Master Plan Update not the Draft Environmental Assessment recommends placing overhead utility systems underground along Kakalaka Avenue, Monsarrat Avenue, and Paki Avenue. Definitive information was not provided in the DEA because a design plan for placing the overhead utility lines underground has not been prepared.
2. Potential impacts of placing the utility systems underground were disclosed in the DEA. Please refer to Section 3, pages 33-35.



Paki Avenue Improvements

1. A suggested or possible design treatment was shown as Figure 12 (p. 37) of the DEA. More detailed design and/or construction plans for improvements on Paki Avenue as proposed in the Master Plan Update will be prepared when the City funds actual construction of improvements. It is the intent of the Paki Avenue improvements to upgrade the present conditions to address issues of traffic flow, public safety, and the protection of existing trees. The proposed improvements to Paki Avenue are compatible with the general historical status of Kapiolani Park as the proponents perceive it.
2. Clearly defined improvements mean improvements that define the edge of the roadway for motorists and pedestrians such as concrete curbing. Defined edges would also aid in preventing illegal parking along sections of Paki Avenue and enhance protection of existing trees.
3. One of the primary goals of the road improvements is to protect the existing trees by discouraging or preventing cars from parking on or near the root zone.
4. The current walkway varies in width between Monsarrat Avenue and Poni Moi Street. The proposed 10-12 wide path is proposed to accommodate multiple-use including bicycle traffic.
5. The purpose of realigning the walkway is to move walkway users further away from the road and road shoulder and tree root zones.
6. Detailed walkway design and construction documents shall be prepared for each specific project. The final design shall consider existing drainage patterns, existing trees and palms, and material selection. It is anticipated that construction will affect only the top surface of the existing grade.

Reconstruct Parking Lot

1. The number of parking stalls to be added to the reconstructed parking will be determined during the design stage for the parking lot. Any added parking stalls should make up for the loss of some of the parking stalls along Paki Avenue.
2. & 3. Detailed design plans have not been prepared, however, from a master plan standpoint, the total paved area for the proposed parking lot will not increase from the existing built area.

Acquire Residential Lots

There is no plan to acquire property for Kapiolani Regional Park through condemnation but to purchase the private residential lots as they become available. Acquiring the few



remaining residential lots between Paki and Leahi Avenues is recommended as a long-term strategy to insure a cohesive plan for Kapiolani Regional Park.

Figure 3 Master Plan

1. For practical reasons and to avoid delaying improvements to the entire park, the Waikiki Natatorium is excluded from the master plan. A separate study is currently being undertaken to determine appropriate use and improvements, including parking. When the plan is completed and approved, another update of the Kapiolani Regional Park Master Plan will be promulgated.
2. Detailed plans refer to enlarged partial plans, which would otherwise be unreadable on the overall master plan. They provide a general scope of the proposed project or improvement and are not intended to be a final design document.  
  
The planned new Honolulu Zoo Entry is located on Kapiolani Park Trust lands as is the entire Zoo. The City has worked with community interest groups and individuals, and-most of them recognize the need for a new entrance and the challenges faced by the City. Some minor adjustments have been to the Park master plan at the Zoo entrance and are shown in Figure 4 of the Final Environmental Assessment (FEA).  
  
There is also recognition of the need for a sign to identify Kapiolani Regional Park. The sign would be placed in the general location now occupied by an information kiosk. Conceptually, the sign would be wall mounted or cast in a low curved wall. The wall would be less than 24-inches in height so as to not obstruct views into the Park.

Figure 11

1. Your statement of opinion concerning widening of park walkways is acknowledged. However, a balance must be struck between the convenience of park users (who have with different individual preferences concerning park development) and the DPR maintenance staff which maintains the grounds.
2. The areas to be improved with widened walkways were identified in the DEA. Please refer to Section 1, Item 1, Honolulu Zoo Entrance and Item 2, Walkways Widening on page 2, and Figure 3 Master Plan on page 8.
3. Walkways will be sloped to drain onto the adjoining grassy area where runoff can percolate into the ground. This condition occurs with the present walkways without adverse water quality impacts.
4. Your statement of opinion concerning the park's historical status is acknowledged. The City administration believes the proposed improvements respect the historical status of the park and the overall public interest. Inclusion of the park in the State's



Historic Register does not imply that the land owner or manager is prevented from making needed improvements. Proposed improvements must be reviewed and approved by the State Historic Preservation Division (SHPD) prior to their implementation.

Short-term Impacts-Site Work

1. In sequence, the sections of the DEA, described the proposed improvements, the existing environment, and potential impacts on the environment resulting from the proposed actions.
2. Impacts associated with placing utility lines underground and reconstructing Paki Avenue were disclosed in the DEA. Please refer to Section 3, pages 33-35.
3. Grubbing and grading may not be necessary for each improvement. The City will obtain the necessary permits for grubbing and grading for each construction project requiring it, and comply with permit requirements and best management practices.
4. The quantity of soil to be grubbed from each construction site will be determined during the design stage for improvements that require grading work.
5. The site work contractor will select a stockpile site and off-site disposal area.
6. Engineering plans will provide estimates of required fill material. The site work contractor will determine where soil will be stockpiled.
7. The site work contractor, in coordination with the City, will find an appropriate location for a staging area. It is not possible, nor is it reasonable, to provide the level of detailed information related to future construction plans that are being requested in an environmental disclosure document.
8. All existing light poles along Paki Avenue, the Zoo entry, and areas where overhead utilities will be placed underground will be replaced with new light poles.
9. The locations for on-site drainage facilities have not been determined. It is not likely that structural alternatives such as concrete detention basins would be constructed. It would be more appropriate for the Park setting that runoff be directed to low-lying areas where water can collect and percolate into the ground. In effect, this would be a continuation of present day drainage and best management practices.
10. All construction activities will comply with noise and dust abatement regulations at the time permits are obtained. The City provides public notice of impending construction projects affecting an area.



Long-term Impacts

1. & 2. Please refer to the response #4 to the questions concerning "Figure 11" above. Although the Honolulu Zoo is located within the historic Kapiolani Park boundary, it is not specifically a historic feature itself.

Figure 12

1. Replacement of the comfort station also is mentioned on page 4, Reconstruct Parking Lot.
2. The exact location of the proposed comfort station has not been determined, but is anticipated to be within the same general area of the existing structure.
3. The existing comfort station is located in a maintenance building adjoining the parking lot *makai* of Paki Hale. There is also an adjacent building currently used by park personnel. Both existing structures are proposed to be demolished and replaced with a new comfort station.
4. The existing facility will be replaced with a stand-alone comfort station. The proposed comfort station is a replacement facility and not expected to increase wastewater flow.

Page 38

1. The walkways will be sloped to drain in the direction of the Park where runoff can percolate into the ground.
2. On-site drainage systems or methods will be constructed if needed and best management practices are to be employed. The location of and design of such systems if needed will be determined during the design stage of the respective improvement. It is anticipated that the detention basins and holding areas would consist of grass swales and low-lying areas.
3. The proposed improvements are not anticipated to significantly affect existing drainage patterns. A Drainage Plan will be prepared if one is needed.
4. See response to comment 2 above.

Alternatives to the Proposed Action

1. As indicated in the discussion of circulation alternatives, "Circulation Alternatives "A" thru "D" were not selected for implementation in the Kapiolani Regional Park Master Plan Update because changes in existing circulation patterns could affect vehicle circulation beyond the limits of the Park in neighborhoods such as Waikiki, Kapahulu, and Diamond Head. Changes to the existing circulation pattern also would affect bus routes and bus stops on streets in the vicinity of the Park. "
2. Transportation alternatives were considered early on in the master planning process because of potentially significant impacts to the park as a whole, including recreational uses and circulation patterns. It was determined that circulation changes would have had considerable environmental impact on vehicle circulation patterns on streets adjoining the park and possibly affect vehicle circulation in neighborhoods beyond the limits of the park such as Waikiki, Kapahulu, and Diamond Head.

Additional Questions

1. The Kapiolani Regional Park Master Plan Update is an update of the 1992 interim master plan and not the 1983 master plan.
2. Some archaeological reconnaissance work has been completed within the general Park area in the past, particularly within the Zoo. If required, additional archaeological reconnaissance work and an archaeological monitoring plan will be prepared and submitted to the SHPD for review and approval at the time specific design and construction projects to implement the master plan are undertaken. The monitoring plan would apply to those improvements recommended for monitoring by the SHPD.
3. A FONSI has not been issued. An environmental assessment is a disclosure document and not an approval document. The Master Plan Update, including the proposed improvements, is also subject to the City's Special Management Area review and approval process.
4. The plans for the New Zoo Entry, as revised and shown in the FEA, are the most current design documents available. The final construction bid documents may deviate from that shown in the FEA, but not in any way significantly affecting the disclosure and analysis of this action's impacts.
5. & 6. Your statement of opinion concerning the Special Management Area (SMA) permit requirements for the proposed improvements of the 1983 Park master plan and the Master Plan Update that is the subject of this environmental review process is acknowledged. The Director of the DPP, however, has the responsibility for making the determination for SMA approval based upon the City ordinances, rules and regulations, and past precedent.



7. An archaeological survey was not included in the scope of the park master plan development project as nearly all of the areas addressed under the Master Plan Update have been previously disturbed. See also 2. above.
8. The implementation of proposed improvements is dependent on available funding.  
The next master plan update shall address improvements not undertaken under this master plan and determine if the improvements should remain, be revised, or removed.

The participation of Hawaii's Thousand Friends in the environmental assessment review process is appreciated.

GERALD PARK URBAN PLANNER

  
Gerald Park

c: T. Hildebrand, DDC



LINDA LINGLE  
GOVERNOR OF HAWAII

STATE OF HAWAII  
DEPARTMENT OF HEALTH  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL  
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LAURENCE K. LAU  
Acting Director



July 9, 2007

Mr. Eugene C. Lee, P.E.  
Director  
Department of Design and Construction  
City and County of Honolulu  
650 South King Street, 11<sup>th</sup> Floor  
Honolulu, Hawaii 96813  
Attention: Mr. Terry Hildebrand, Facilities Division

Dear Mr. Lee:

Subject: Draft Environmental Assessment (DEA) for Kapiolani Regional Park Master Plan Update

Our office has reviewed the DEA for the project noted above. We have the following comments:

Page 2, Section C. Technical Characteristics, 1. Honolulu Zoo Entrance, paragraph 1: Is the design of this facility suitable for a historic park established in 1877?

Page 2, #1. Honolulu Zoo Entrance, paragraph 2: What is the age of the existing entrance building? Does it have historic significance? If so, will it be restored per US Secretary of the Interior Standards for Rehabilitation?

Page 2, #1. Honolulu Zoo Entrance, paragraph 3, lines 1-3: When were the existing walkways added? Will the widening of the walkways negatively impact the historic setting of the park?

Page 2, #1. Honolulu Zoo Entrance, paragraph 3, lines 3-4: Will the trellises negatively impact the historic setting of the park?

Page 2, #2. Walkways Widening: Were the existing 3-foot walkways part of the plan of the 1887 park? If so will the widening of the walkways negatively impact the historic setting of the park?

Page 2, #3. Replace Softball Field: When was the softball field erected? Was it part of the original plans for the park?

Mr. Eugene C. Lee, Director  
July 9, 2007  
Page 2

Page 2, #4. Modify Existing Softball Fields: When were these softball fields built? Will the modifications impact the historic setting of the park?

Page 3, #5. Accessibility Improvements: Will these improvements be designed to be sensitive to the historic elements in the park?

Page 3, #6. Bicycle and Moped Parking, lines 1-3: Will these improvements negatively impact the historic setting of the park?

Page 3, #7. Underground Overhead Lines: Has an archaeological study been done for the park area?

Page 3, #8. Paki Avenue Improvements:

paragraphs 2 and 3: What was the original design of the park? Will this widening negatively impact the historic setting?

paragraph 5: Where were these walkways placed in the original park plans? Will this impact the historic setting?

Page 4, #9. Reconstruct Parking Lot, paragraph 2, lines 1-2: Will this impact the historic setting?

Page 4, #9. Reconstruct Parking Lot, paragraph 2, lines 2-3: Are these structures over 50 years of age?

Page 5, Section F. Social Characteristics: When was the Elks Softball Field built?

Page 15, Section A. Existing Conditions, Central Area, line 2; "1770's" should be changed to "1870's."

Page 15, Archery Range: When was the archery range built?

Page 16, Paki Area, paragraph 1, lines 1-4: When was the Queen Kapiolani Garden established?

Page 18, Section E. Soils, paragraph 4, lines 5-10: Please include the historic data mentioned as an appendix to the FEA.

Page 19, Section G. Flood Hazards, paragraph 3: What plans are there to mitigate the flooding after heavy rains?

Page 22, Section I. Historical Features, paragraph 4, lines 1-2: Are there plans to preserve, protect the site of Papa'ena Heiau and include it within the park boundaries?

Page 31, Section A. Assessment Process, paragraph 2: A careful historic and architectural analysis of the series of changes that have been made to the park since 1877 should be made. Extant historic features in the park could be used as a framework for channeling the design of the park in the direction of its historic condition.

Mr. Eugene C. Lee, Director  
July 9, 2007  
Page 3

Page 31, paragraph 3: please refer to the comments above relating to the original design of the park.

Page 32, paragraph 1, lines 5-7: please refer to comments above relating to the original design of the park.

Page 34, #4. Archaeology and Historical Resources, paragraph 1: Has an archaeological survey be conducted of the park grounds?

Page 35, Section C. Long-Term Impacts, paragraph 5, lines 2-6: What impacts will modifying the parking on Paki Avenue, installing curbing and expanding the parking lot below Paki Avenue have on the historic design of the park?

Page 37, Figure 12, Re-Construct Existing Parking What is the age of the existing structures and comfort station to be demolished?

Page 38, paragraph 3, lines 3-9: Please include a more detailed drainage plan in the FEA.

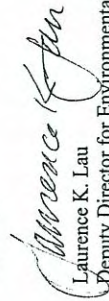
Page 38, paragraph 5: Please include photos of current coastal views looking makai from various locations mauka of the new zoo entrance and photo-simulations of the views after the facility is constructed.

Page 39-41, Section 4. Alternatives to the Proposed Action, B. Circulation Alternatives: Was a combination of Alternatives "B" "C" and "D" considered, whereby Paki Avenue traffic would be channeled to a widened Leahi Avenue and its extension to Poni Moi Road, Paki Avenue closed to traffic within the park, Monsarrat Avenue ended at the northern extremity of the Waikiki Shell (closed makai of that point), and Kalakaua Avenue closed west of the Natatorium? This would facilitate an integration of park activities. Construction of underground parking facilities similar to those at City Hall Annex or the newly constructed underground lot in Chinatown designed with with a park above it.

Page 49, Section 8. Determination of Significance, Item #1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resource: The State Historic Preservation Division must perform a thorough review before it can be determined that no cultural resources will be lost. Please include a set of original 1877 plans and any subsequent plans of Kapiolani Park in the FEA.

Should you have any questions, please call George Casen or Leslie Segundo at 586-4185.

Sincerely,

  
Laurence K. Lau  
Deputy Director for Environmental Health

c: Mr. Gerald Park, Urban Planner



April 10, 2008

Katherine Puana Kealoha, Interim Director  
Office of Environmental Quality Control  
State of Hawaii  
235 South Beretania Street, Suite 702  
Honolulu, Hawaii 96813-2437

Dear Ms. Kealoha:

Subject: Kapiolani Regional Park Master Plan Update  
Honolulu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. We offer the following responses to your comments in the order that they were presented.

Page 2, Section C. Technical Characteristics. Although the Honolulu Zoo is located within the historic Kapiolani Park boundary, it is not a historic feature.

Page 2, #1, paragraph 2. The existing entry building was constructed in 1962. The building is not historically significant and not listed on the State or National Registers of Historic Places.

Page 2, #1, paragraph 3, lines 1-3. Records are not readily available concerning the construction of walkways in the Park, including the Zoo entrance. Such information is not relevant because the walkways are not a historic feature of the Park.

Page 2, #1, paragraph 3, lines 3-4. It is the City's view that the proposed trellises will not impact the historical setting or nature of the Park.

Page 2, #2: The existing 3-foot wide walkways were not part of the 1887 park.

Many of the reviewer's comments make reference to the "historic setting of the park, the original plans for the park, or the original design of the park." The proposed Master Plan Update is the most recent plan that has been prepared for Kapiolani Regional Park. Previous plans shaped the park into its present size and form with recreation facilities that are used and enjoyed by visitors to the Park. It is unreasonable to evaluate potential impacts of the Master Plan Update improvements on the original plans for the Park or the original design of the Park since the Park has undergone many changes since it was created 130 years ago. In fact, one of the main features dominating the original park was a large oval track for horse racing.

Page 2, #3. There is no record of when Elks Field was laid out. It was not part of the original plans for the Park.

Page 2, #4: There is no record of when the softball fields were laid out. Such information is not relevant because proposed modifications to the existing softball fields will not affect the historical setting of the Park. Being a regional park, the Department of

Katherine Kealoha  
April 10, 2008  
Page 2

Parks and Recreation (DPR), does not permit permanent structures such as baseball backstops or soccer goal nets to be installed. Such equipment must be temporary and dismantlable and stored away from public traffic when not in use. The ball fields consist of nothing more than temporary chalk lines and other equipment temporarily occupying space in an open, grassed field area.

Page 3, #5: Accessibility improvements will be designed to be sensitive to historic elements of the park.

Page 3, #6: Negative impacts are not anticipated from the construction of bicycle and moped parking areas.

Page 3, #7: An archaeological study was not prepared for the Master Plan Update. Several archaeological and architectural studies have been performed for the Park and for several structures in the Park in the past when construction plans for specific improvements were prepared. The City will continue to do the same when construction plans for future improvement projects are prepared.

Page 3, #8: Paki Avenue appears to be part of the original development plan for the area but no detailed plans, for example road widths, are available. Improvements to Paki Avenue may or may not involve widening the travelway and will be determined during the design phase of the project. The Master Plan Update is conceptual only and serves to identify the general nature of the proposed improvements. It is not anticipated that the improvements will have a negative impact on the historical setting.

Page 4, #9: The parking lot to be reconstructed and will not impact the historic setting of the Park. The proposed improvements will make the existing parking lot more efficient and upgrades a facility that has deteriorated over the years through use.

Page 4, #9. The two structures are less than 50 years old.

Page 5, Section F: See response to Page 2, #3 comment above.

Page 15, Section A: The Final Environmental Assessment (FEA) will correct this information to state that it was the 1880's.

Page 15, Archery Range: The Archery Range was established in 1963.

Page 16, Paki Area: The Queen Kapiolani Garden was established in 1957 as a hibiscus garden and replaced by a rose garden in 1971.

Page 18, Section E, Soils: There is no historic data on soils to append. The reference to historic Waikiki and Kapiolani Park was excerpted from "Kapiolani Park: A Victorian Landscape of Leisure" by Robert Weyeneth. The document is cited in the References.



GERALD PARK  
Urban Planner

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Page 19, Section G. The Master Plan Update does not propose measures to mitigate flooding after heavy rains. The current condition of runoff collecting in low spots and percolating or evaporating serves the Park adequately and will continue.

Page 22, Section 1. Due to prior disturbance to the site, the exact location of the Papa'ena'ena heiau has not been determined but is likely outside the boundary of Kapiolani Regional Park. Questions of protection and preservation are beyond the scope of the Master Plan Update and this environmental disclosure process. There are no plans presently for the City to identify the site and acquire it in order to incorporate it into the Park.

Page 31, Section A. Thank you for this suggestion. When warranted, the City undertakes such studies. The City believes, however, that the issue you refer to has already been adequately addressed in the Master Plan Update process and the DEA. Moreover, the Master Plan Update proposes improvements that are modest in nature and limited in scope. No major new structures are being proposed nor any changes in functions or recreational uses within the Park.

Page 31, paragraph 3: See response to Page 31, Section A comment above.

Page 32, Paragraph 1: See response to Page 31, Paragraph 1 comment above.

Page 34, #4: See response to Page 3, #7 comment above.

Page 35, Section C. Modifying the parking on Paki Avenue should improve vehicle circulation, eliminate illegal parking, help to protect trees, and foster vehicle and pedestrian safety.

Page 37, Figure 12: See Response to page 4, #9 comment above.

Page 38. A detailed drainage plan is not required for the Master Plan Update. Construction plans for future improvements will include detailed drainage plans, where needed that will be consistent with the drainage planning information that has been discussed during this environmental disclosure process.

Page 38, Paragraph 5. Photographs showing selected areas in the park were included in the Draft Environmental Assessment. It is unreasonable to expect that additional photographic and photo-simulations should be prepared at a commenter's request, especially when no rational is provided for such a request.

Page 39-41, Section 4. The circulation alternatives were evaluated as presented. Evaluation of other schemes, such as the one you propose, is not contemplated until such time that the Park Master Plan is updated again in the future.



Page 49, Section 8. The Draft Environmental Assessment was sent to the State Historic Preservation Division (SHPD) for review and comment. Written comments have not been received from them as of the date of this response letter.

The SHPD will have many opportunities to review and approve future proposed Park improvement projects at the design and implementation stages. There is no legal requirement as per Chapter 343, Hawaii Revised Statutes, for the agency to approve the Park Master Plan Update or offer comments on the DEA. It is entirely voluntary on their part at this time if they wish to offer comments.

Information concerning the original 1877 plans and subsequent plans for Kapiolani Park are included in the previously referenced "Kapiolani Park: A Victorian Landscape of Leisure" by Robert Wyeneth, cited in the References section of the DEA. The document is generally available in local libraries and archives. It is inappropriate to include this information in the FEA.

The participation of the Office of Environmental Quality Control in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC

DEPARTMENT OF FACILITY MAINTENANCE  
**CITY AND COUNTY OF HONOLULU**  
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MUJI HANNEMANN  
MAYOR

LAVERNE HIGA, P.E.  
DIRECTOR AND CHIEF ENGINEER  
GEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

IN REPLY REFER TO:  
DRM 07-619

July 10, 2007



Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
Honolulu, Hawaii 96814


Dear Mr. Park:

Subject: Draft Environmental Assessment (DEA)  
Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for the opportunity to review and comment on the May 2007 DEA for the Kapiolani Regional Park Master Plan Update.

The Park Master Plan recommends reconstructing Paki Avenue between Poni Moi Street and Monsarrat Avenue. Maintenance of the roadway and associated infrastructure rests with the Department of Facility Maintenance. Accordingly, we request all proposed improvements to the roadway be in accordance with City and County standards. Furthermore, the pavement structure should be designed to support the City and private tour bus loads that the roadway will be subjected to.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 484-7697.

Sincerely,  
  
Laverne Higa, P.E.  
Director and Chief Engineer



GERALD PARK  
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April 10, 2008

Laverne Higa, P.E., Director  
Department of Facility Maintenance  
City and County of Honolulu  
1000 Uluohia Street, Suite 215  
Kapolei, Hawaii 96707

Dear Ms. Higa:

Subject: Draft Environmental Assessment  
Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii  
DRM 07-619

Thank you for your reviewing and commenting on the Draft Environmental Assessment prepared for the subject Kapiolani Regional Park Master Plan Update.

As indicated by your comment, proposed improvements to Paki Avenue between Poni Moi Street and Monsarrat Avenue will be constructed in accordance with City and County standards. Your comment about designing the pavement structure to support the City and private tour bus loads will be considered in the design engineering for the road improvement.

The participation of the Department of Facility Maintenance in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER



Gerald Park

c: T. Hildebrand, DDC



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

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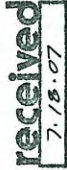
MUJI HANNEMANN  
MAYOR

HENRY ENG, FAICP  
DIRECTOR

DAVID K. TANOUÉ  
DEPUTY DIRECTOR

2007ELOG-1553 (MW)

July 12, 2007



Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
Honolulu, Hawaii 96814

Dear Mr. Park:

Subject: Draft Environmental Assessment for the Kapiolani Regional  
Park Master Plan Update, Honolulu, Oahu, Hawaii

We have reviewed the subject project, and provide the following comments.

Urban Design Branch

Please make the following updates on pages 25 and 47 regarding the permits which the proposed new Zoo entrance feature will require from our department. First, the project, which is a major action, will need a new Special Management Area use permit. Second, the project will not require a Waiver – only an Exception – to the Diamond Head Special District's height limit of 0 feet, unless the height of the new entry building will exceed 25 feet.

A Street Tree Plan will be required for any area where new street trees are to be added.

Regarding Figure 11 on page 36, consideration should be given to retaining the planting strip on the mauka side of Kalakaua Avenue and widening the sidewalk along its mauka edge. Street trees within the planting strip can provide additional shade for pedestrians and parked vehicles.

We recommend that the total number of public parking spaces not be decreased. You may wish to add a statement to this effect on pages 4 and 35 of your report.

We recommend that the Tax Map Key numbers of all affected parcels be listed in the text, and not just shown on Figure 2. This could be done by listing the existing parcels right after the reference to Figure 2 on page 1, and by listing the parcels to be acquired right after the lot-acquisition paragraph on page 4.

Mr. Gerald Park  
Gerald Park Urban Planner  
July 12, 2007  
Page 2

Policy Planning Branch

On page 23, please repeat exactly the five (5) lines on City land use controls given on the Summary Information page at the very start of the report (page 7). Do not mention either the Oahu General Plan or the repealed Development Plan Public Facilities Map, and use "Within" rather than "inside" the Special Management Area.

The regional impacts of the street closures that were considered but decided against (pages 39-41) should be discussed. Alternatively, the EA should indicate that another EA would be prepared if these traffic alternatives are considered for implementation. Clearer language should be used to describe the potential closures. Two (2) examples of especially misleading proposed actions are:

- **"Close Kalakaua Avenue (eastbound) on to Monsarrat Avenue."**  
You do not actually mean closing the entire intersection, but just prohibiting left turns from Kalakaua Avenue onto Monsarrat Avenue. (Alternatives "A", "B", and "D")
- **"Close Kalakaua Avenue from Paki Avenue to Dillingham Fountain."**  
You do not actually mean closing the entire southern end of Kalakaua Avenue, but closing the mauka alignment of Kalakaua Avenue to reroute the north bound traffic along the mauka alignment.

Wastewater Branch

All new facilities, including the proposed new Zoo entrance, require the submittal and approval of a Site Development Master Application for any needed sewer connection.

Should you have any questions regarding the above comments, please contact: Joyce Shoji of the Urban Design Branch at 768-8032, Mike Watkins of the Policy Planning Branch at 768-8044, or Tessa Ching of the Wastewater Branch at 768-8199.

Very truly yours,

Henry Eng, FAICP, Director  
Department of Planning and Permitting

HE:js

cc: DDC, attn: Terry Hildebrand  
OEQC

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April 10, 2008

Henry Eng, FAICP, Director  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Eng:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii  
2007/ELOG-1553 (MW)

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. We offer the following responses to your questions and comments in the order that they were presented.

Urban Design Branch

1. The List of Permits and Approvals on pages 25 and 47 will be updated as presented in your comment.
2. A Street Tree Plan will be prepared as required.
3. Retaining the grass planting strip was considered but widening the sidewalk to the curb is the desired treatment.
4. The total number of legal public parking spaces will not be decreased.
5. Your comment about listing the Tax Map Keys of all affected parcels will be considered.

Policy Planning Branch

1. The discussion of land use controls presented on pages 23 to 25 will remain.
2. Regional impacts of Circulation Alternatives "A" through "D" were not considered because only the roads adjoining Kapiolani Regional Park were investigated to determine if there were feasible traffic options that would improve and enhance the use and enjoyment of Kapiolani Regional Park.
3. Because none of the circulation alternatives were included in the Master Plan Update, there is no need for textual changes.

Wastewater Branch

1. A Site Development Master Application will be submitted for new facilities needing a sewer connection.

Henry Eng  
April 10, 2008  
Page 2

The participation of the Department of Planning and Permitting in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

*Gerald Park*  
Gerald Park

c: T. Hildebrand, DDC



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STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
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received  
7-22-07

HRD07/3063

July 13, 2007

Gerald Park  
Gerald Park Urban Planner  
1221 Kapi'olani Blvd.  
Honolulu, HI 96814

RE: **Kapi'olani Regional Park Master Plan Update, Waikiki, District of Honolulu, O'ahu, Hawaii'i, TMK: various**

Dear Gerald Park,

The Office of Hawaiian Affairs (OHA) is in receipt of your May 31, 2007 submission and offers the following comments:

OHA has reviewed the Draft Environmental Assessment (DEA) of the Kapi'olani Regional Park Master Plan Update and has noticed that page 41, Alternative D in Section 4 "Alternatives to the Proposed Action" was not included in your submittal to OHA. Please submit this section to our staff.

It is noted in the DEA that Kapi'olani Park is on the State Historic Register of Historic Place (State Inventory of Historic Places # 80-14-9758) and is eligible for placement on the National Register of Historic Places. Also the State Historic Preservation Division must give clearance for any construction to begin. If the project moves forward, and if any significant cultural deposits or human skeletal remains are encountered, work shall stop in the immediate vicinity and the State Historic Preservation Division (SHPD/DLNR) shall be contacted.

Thank you for the opportunity to comment. If you have further questions or concerns, please contact Jason Jeremiah, Policy Advocate-Preservation, Native Rights, Land and Culture, at (808) 594-0239 or [jasonj@oha.org](mailto:jasonj@oha.org).

Aloha,

Clyde W. Nāmu'o  
Administrator



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April 10, 2008

Clyde Nāmu'o, Administrator  
Office of Hawaiian Affairs  
711 Kapiolani Boulevard, Suite 500  
Honolulu, Hawaii 96813

Dear Mr. Nāmu'o:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii  
HRD07/3063

Thank you for reviewing the Draft Environmental Assessment prepared for the Kapiolani Regional Park Master Plan Update. We offer the following responses to your comments in the order they were presented.

The missing page, page 41, was mailed to the Office of Hawaiian Affairs and other consulted agencies and organizations after it was discovered to be missing.

State Historic Preservation Division ("SHPD") clearance will be sought for the planned improvements. SHPD will be given the opportunity to review any of the improvements proposed in the Master Plan Update at the completion of the design phase of any improvement project and prior to commencing with the action. It is also anticipated that the design consultant will seek input from SHPD during the design process itself.

Should any cultural deposits or human skeletal remains be encountered during construction of the proposed improvements, work in the immediate area will cease and the SHPD contacted for proper disposition of the finds.

The participation of the Office of Hawaiian Affairs in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC

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**KAPI'OLANI PARK ADVISORY COUNCIL**

**RESPONSE TO THE**

**KAPIOLANI PARK MASTER PLAN UPDATE**

**ENVIRONMENTAL ASSESSMENT**

## KAPI'OLANI PARK ADVISORY COUNCIL

Department of Design and Construction  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813  
Attention: Mr. Terry Hildebrand

Department of Land and Natural Resources  
State Historic Preservation Division  
601 Kamokila Boulevard, Room 555  
Kapolei, Hawaii 96707  
Attention: Susan Y. Tasaki

Gerald Park, Urban Planner  
1221 Kapiolani Boulevard, Suite 211  
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Department of the Attorney General  
425 Queen Street  
Honolulu, Hawaii 95813

Miyabara Associates  
928 Bethel Street, Suite 401  
Honolulu, Hawaii 96817

Kapi'olani Park Trustees  
530 South King Street, Room 202  
Honolulu, Hawaii 95813

Subject: **Kapiolani Park Master Plan Update Environmental Assessment**

Dear Mr. Hildebrand et al:

Thank you for your request for comments on the Kapiolani Park Master Plan Update Environmental Assessment. We enclose the attached information, document references, comments, concerns and questions for your review and attention.

Kapiolani Park is governed by charitable trust provisions and is a registered historic landscape. The cumulative impacts of the proposed Master Plan Update on this historic site and its property held in trust must be considered and disclosed. The alternatives provided in the Draft Environmental Assessment appear unrelated to the proposed action, and fall short of the alternatives available to avoid potential significant negative impacts of the proposed modifications to Kapi'olani Park, both individually and cumulatively.

We believe that the proposed Kapiolani Master Plan Update warrants a full Environmental Impact Statement undertaking. We are additionally concerned that the Department of Design and Construction is engaged in this process as the Proposing Agency and Applicant, the Approving Authority, and the determinant of any Finding of No Significant Impact.

We therefore look forward to your reply to the enclosed response, as well as to the comments provided by the State Historic Preservation Division and other concerned community organizations. Please feel free to contact us with any questions regarding the attached.

Sincerely,

*Michelle S. Matson*  
Michelle Spalding Matson  
President

Kapi'olani Park Advisory Council c/o 3931 Gail Street, Honolulu Hawaii 96815-4502

## Evaluation of the Proposed Kapiolani Park Master Plan Update Draft Environmental Assessment

### A. Kapiolani Park Trust Boundary

#### Background

Kapiolani Park was formed from the Crown lands of the Kamehameha coastal plain and Kapua, where Hawaiian ali'i warriors once trained and held competitions at the foot of Diamond Head, then known as Leahi. King David Kalakaua dedicated Kapiolani Park on Kamehameha Day in 1877, proclaiming that the Park would reflect Victorian parks in Europe and America and be "the first public park of the Kingdom... a resort and place of innocent refreshment for all those who wish to leave the dust of the town streets."<sup>1</sup>

During the period of political turmoil that followed the overthrow of the Hawaiian Monarchy in 1893, and prior to annexation of Hawaii to the United States in 1898, a commission of Trustees was established to protect Kapiolani Park as a "permanent park and recreation ground" for people of Honolulu. By legislative enactment and agreement between the Kapiolani Park Association, William G. Irwin and the Republic of Hawaii, in 1896 the Park lands were consolidated to be placed in a perpetual Trust with the contractual understanding that the Trustees and their "heirs and successors in trust forever ...shall not have the authority to lease or sell the land comprising the said park or any part thereof."<sup>2</sup>

The Hawaii Supreme Court upheld this Trust provision in 1988, noting from case history that any conveyance or encumbrance of Kapiolani Park Trust land "is not according to the will of the donors, and is subversive of the contract, on the faith of which their property was given."<sup>3</sup> Thus in accordance with the Trust provisions, the true Kapiolani Trust boundary is one that must remain unchanged.

#### Kapiolani Park Trust Boundary Alteration

The Kapiolani Park Trust boundary and the separate Kapiolani Regional Park boundary for municipal maintenance purposes are clearly delineated on the Kapiolani Park Consolidation Map<sup>4</sup> as consistent with the "Conclusions of Law" noted on same.<sup>5</sup> The Kapiolani Park Trust boundary is clearly identified by the Consolidation Map legend as the "Area subject to Kapiolani Park restrictions," and the separate municipal Kapiolani Regional Park use boundary is clearly identified on the map legend as "Present boundary of Kapiolani Park."

<sup>1</sup> Kapiolani Park Dedication, June 11, 1877; please replace "evade" accordingly in DEA Section 2.J.a., page 24.

<sup>2</sup> Act 53, Session Laws of 1896, Section 1.

<sup>3</sup> Hawaii Supreme Court Appeal from First Circuit Court No. 12323, Opinion of the Court dated March 22, 1988, pages 5 and 10.

<sup>4</sup> Consolidation Map for Queen Kapiolani Park from Registered Map No. 3096, dated October 21, 1982 (City and County of Honolulu), State Survey Office.

<sup>5</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991.

However, in the Kapiolani Park Master Plan Update Draft Environmental Assessment (DEA), it appears that the Department of Design and Construction (DDC) has egregiously erred by altering the Kapiolani Park Trust boundary<sup>6</sup> to exclude generally all of Kapahulu Avenue from Paki Avenue to Kalakaua Avenue, including a portion of Thurston triangle; two portions of the south side of the Jefferson School enclosure to Kuhio Avenue, and a small corner parcel between Kuhio Avenue and Cartwright Road; the Paki Avenue fire station parcel; and a portion of Trust land at Leahi Street and Noela Drive.<sup>7</sup> To effect this change would unconstitutionally defraud the contractual commitments made to establish the specific Kapiolani Park lands in Trust in perpetuity, "by giving the trustee City a power which the government had expressly agreed the trustee would not have."<sup>8</sup>

#### **City as Day-to-Day Custodian for Kapiolani Park**

The DEA correctly notes that the Honolulu City and County (City) is the day-to-day custodian of Kapiolani Park,<sup>9</sup> which is protected in perpetuity under the Kapiolani Park Trust.<sup>10</sup> As such custodian, the City is obligated to recognize the true Trust boundary within which the Trust lands are held, and within which the recreational park is managed by the City in accordance with Act 163, Executive Order 22 and the associated park management deed of 1913. In 1991, the Circuit Court of the First Circuit (Court) ruled that the duly elected members of the City Council were to serve as successor Trustees for the Kapiolani Park Trust subject to the supervision of the Courts, and as such shall "enforce the basic provisions of the Trust, i.e., insuring that those portions of Kapiolani Park which are part of the Trust are kept within the Trust in perpetuity, and that the Trust lands are used only for park purposes within the terms of the Trust."<sup>11</sup> (Emphasis added).

#### **Conveyance of Adjacent Land into the Trust as Compensation for Other Uses**

Within the same Trust boundary, the City has designated the diamond head side of Kapahulu Avenue as a boundary for park use and municipal maintenance purposes by the Department of Parks and Recreation. And while Kapahulu Avenue between Paki Avenue and Kalakaua Avenue remains within the Kapiolani Park Trust, this thoroughfare's municipal use and maintenance are placed with the City's Department of Transportation Services. However, since Kapahulu Avenue, portions of Jefferson School and Thurston Triangle, and the fire station on Paki Avenue remain Trust land but were used for other than Park purposes over the years, the Court also ruled, "Because of public safety reasons and based on the Court's equitable powers, the Court concludes that these lands can continue to be *used* for a fire station, and that small remnant portions of Trust lands *ewa* of Kapahulu Avenue, which have

been incorporated into public streets and a public school, may continue to be *used* for street, school and other public purposes, so long as an equal amount of existing park land adjoining or part of Kapiolani Park and not already encumbered by the Trust, be added to the Trust lands and be irrevocably subject to the terms of the Trust."<sup>12</sup> (Emphasis added).

Thus, since the subject Trust lands are being *used* for public purposes other than Park use, the Trust must be compensated for the absence of Park *use*. To resolve this, by Court stipulation an equal amount of 7.05 acres of adjacent public park land not within the Trust was ordered to be conveyed to the Trust in 1998 to compensate for these continued municipal *uses*; only, of the Trust land, and no Trust land was ordered to be, or is to be, conveyed out of the Trust.<sup>13</sup> Further, should Kapahulu Avenue be widened for municipal public *use* in the future, as suggested by certain circulation proposals in the DEA on pages 39 through 45, additional City land would likely be required by the Court to be transferred to the Trust in perpetuity.

#### **Missing Shoreline Lots**

The DEA also conveys apart from the Trust the City's possession of the shoreline area presently known as Kapiolani Beach and Queen's Surf Beach.<sup>14</sup> Following King Kalakaua's 1877 dedication of Kapiolani Park and development of the Park plan, in 1889 the Commissioners of Crown Lands renewed their lease of 150 Kaneloa Crown land acres to the Kapiolani Park Association for thirty (30) years for development of the Park, and small lots surrounding the Park were sub-leased by the Kapiolani Park Association to raise funds to develop the central Park and its Victorian landscape with carriage roads, bridle paths, ceremonial grounds and a race track.

However, although the Trust was established in 1896 through Act 53 to protect the Park in perpetuity, just preceding and following Hawaii's annexation to the United States in 1898 and prior to the incorporation of the 1905 Revised Laws of Hawaii, several shoreline lots belonging to the Trust were conveyed by the Minister of the Interior and the new Territory to private hands in exchange for properties outside Kapiolani Park without compensation to the Trust, thus clouding the Trust's title that ran with the land.<sup>15</sup>

In 1988 the Hawaii Supreme Court upheld the provisions of Act 53, which stipulated that the Trustees for Kapiolani Park and their "heirs and successors in trust forever ...shall not have the authority to lease or sell the land comprising the said park or any part thereof." Further, the Hawaii Supreme Court concluded that "the situation stood when, in 1913, the Territorial

<sup>6</sup> DEA Figures 2, 3, 5-10 and 13-16, pages 7, 8, 11, 12, 21, 26, 27, 29, and 42-45.

<sup>7</sup> DEA Section 1.A., page 1, and Figures 3 and 6, pages 8 and 12.

<sup>8</sup> Hawaii Supreme Court Appeal from First Circuit Court No. 12323, Opinion of the Court dated March 22, 1988, pages 8 and 11.

<sup>9</sup> DEA Section 2.L., page 30.

<sup>10</sup> The Kapiolani Park charitable trust was established in 1896, not 1892 as indicated in DEA Section 3.A., page 31.

<sup>11</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 22.

<sup>12</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 9.

<sup>13</sup> Amended Stipulation and Order Transferring Land to the Kapiolani Park Trust and Implementation Table, S.P. No. 89-0015 dated June 19, 1998, and 1982 Kapiolani Park Consolidation Map.

<sup>14</sup> DEA Section 1.A., page 1; Section 1.D, page 4; AND Section 2.A., page 13.

<sup>15</sup> Kapiolani Park Map dated 1883 (Brown & Monsarrat) from Government Survey Registered Map No. 1079; and Kapiolani Park Map dated 1912 (Podmore) from Registered Map No. 3096. State Survey Office. Exchange deeds for lots 144 through 149 to end to Cumba, 1897; lots 133 and 134 to Gartenberg, 1898; lots 140 through 143 to Von Holt, 1898; and lots 129 through 132-A to Castle, 1902.

Legislature passed Act 163...” transferring control and management of Kapiolani Park to the City in 1913.<sup>16</sup> (Emphasis added.) Fortunately, over time the City acquired the subject lots and returned them to Park use, but to date their title remains clouded and must be quieted and returned to the Trust.

#### B. Registered Legal Name of “Kapiolani Park”

The DEA states that “Kapiolani Regional Park” has provided recreational opportunities since 1877.<sup>17</sup> However, Kapiolani Park has not been a “regional” park since 1877. The City’s management of the Park began in 1913, and subsequently the City classified Kapiolani Park as a regional park within its system of parks. In accordance with the dedication of Kapiolani Park by King Kalakaua in 1877, the Kapiolani Park Trust of 1896, Act 163 and the Kapiolani Park management deed of 1913, the Court’s designation of the City Council as the trustees of Kapiolani Park in 1991, and the listing of Kapiolani Park on the Hawaii Register of Historic Places in 1992, please refer to the Park as “Kapiolani Park,” i.e., “For 130 years, Kapiolani [Region] Park has provided passive and active recreational opportunities for Honolulu residents and visitors of the Kingdom of Hawaii, the Territory of Hawaii, and presently the State of Hawaii. Kapiolani Park is protected under a charitable Trust and managed by the City and County of Honolulu as a regional park.” (Ramseyer for clarity.)

#### C. Established Objective to Retain the Park’s Historic Character

The DEA states that the Kapiolani Park Master Plan update “does not propose major changes to the historical theme envisioned by the 1983 Master Plan” and the “historic theme is still considered appropriate for the Park,”<sup>18</sup> a registered historic landscape. Indeed, the 1983 Kapiolani Park Master Plan states that “The style and design character of any new buildings or structure shall incorporate, reflect or recollect Hawaiian-Victorian architectural references and details”<sup>19</sup> and “the continuing value of the Park shall be its trees, open space, beach frontage and view of Diamond Head.”<sup>20</sup>

Yet the DDC’s DEA states that the urbanization of Kapiolani Park “continues to this day”<sup>21</sup> and thus proceeds to propose to compromise the Park’s historic open-space frontage with a contemporary shed-roofed glass storefront structure; carve out and develop multiple diagonal and parallel parking bays along Paki Avenue, an historic Park road; and incorporate wide surface hardscapes within historic open spaces at the Park’s entrance and along its interior. Rather than significantly improving the Park, as claimed in the DEA,<sup>22</sup> these proposed development projects both individually and cumulatively significantly compromise the historic character and integrity of this registered historic landscape.

<sup>16</sup> Hawaii Supreme Court Appeal from First Circuit Court No. 12323, Opinion of the Court dated March 22, 1988, pages 5 and 7.

<sup>17</sup> DEA Section 3.A., page 31.

<sup>18</sup> DEA Section 1.B, page 1.

<sup>19</sup> 1983 Kapiolani Park Master Plan, page 26.

<sup>20</sup> 1983 Kapiolani Park Master Plan Management Policy, page 25.

<sup>21</sup> DEA Section 3.A., page 31.

<sup>22</sup> DEA Section 3.A., page 32.

#### D. Proposed Project Segments with Potential Significant Negative Impacts

##### Municipal Zoo Entrance Expansion Impact

The zoo has been a “guest” in the Park since the development of Kaimuki Town behind Diamond Head crater. At that time ostriches and the like were imported as an attraction to help sell lots at the Kaimuki development, and when no longer useful for this purpose the animals were later enclosed in cages in the Park. The most notable subsequent occupant was an elephant named Daisy, who children loved to ride until she mauled her trainer to death and was destroyed. In the 1940’s the zoo was enlarged by the City to occupy a filled area that once featured the Park’s inviting and popular lagoon area with ponds for boating and foot bridges to Makee Island and the first bandstand, and other tree-lined islands with picnic areas. The zoo presently consumes over one-fourth of the area intended by King Kalakaua as a Victorian recreational park and designed by Princess Kai’ulani’s father, Archibald Cleghorn, as a “landscape of leisure.”

The present master plan update now proposes to extend an expansion of the zoo entrance into the historic green open-space landscape of the Trust land beyond the zoo’s present confines.<sup>23</sup> The purpose of this expansion is to construct a 2,500 square-foot storefront facing Kapahulu Avenue because “(T)he corner of Kalakaua Avenue and Kapahulu Avenue is highly visible to pedestrians and motorists and the thousands of residents and visitors daily.” The DEA further curiously surmises, “Because of its proximity to the entrance to the Honolulu Zoo, the gateway appears to be a landscaped entry for the zoo rather than Kapiolani Park, *per se*,”<sup>24</sup> and then confirms, “Some recreational activities will be permanently displaced... the open space fronting the Honolulu Zoo will give way to a new Zoo entrance.”<sup>25</sup> Finally the DEA acknowledges, “The new zoo entry will obstruct views of the ocean.” and will require a Diamond Head Special District height limit waiver.<sup>26</sup>

Thus it goes without saying that the proposed storefront zoo entrance would be an abrupt intrusion into the historic landscape, as shown on Figure 4.<sup>27</sup> Further, in addition to being an exploitative encroachment into Kapiolani Park’s historic open space, the contemporary glass-wall architecture and two-story scale of this proposed expansion as presented to the public by the DDC is incongruous (i.e., out of place, odd, strange, bizarre, absurd, inappropriate, inconsistent, and incompatible) with the historic character of the Park. The present entrance was credibly and sensitively designed over forty-five years ago to unobtrusively fit within the historic landscape, and this compatibility should not be compromised in any way.

What purpose, and indeed what right, does the City administration, as merely the day-to-day custodian assigned to maintain Kapiolani Park, have in attempting to abrogate the historic landscape of this historic entrance to Kapiolani Park? The stated purpose of this intrusive expansion is a permanent storefront, which is an “attraction unto itself” facing Kapahulu

<sup>23</sup> DEA Figure 4 provided by Okada Trucking, page 9.

<sup>24</sup> DEA Section 2.A., page 10, “Kapiolani Park Gateway.”

<sup>25</sup> DEA Section 1.F., page 5.

<sup>26</sup> DEA Section 3.C., page 38, and Section 2.J., page 25.

<sup>27</sup> DEA Figure 4, page 9.

Avenue, thus not *incidental* to the zoo. The zoo in and of itself as an “exhibition” is an allowed use of the Park within the terms the Trust along with “entertainments” and “competitive exercises.” Setting aside Trust land for commercial use is not a provision of the Trust.<sup>28</sup> In fact, commercial use of Trust land has come under serious scrutiny by the State Attorney General, *parens patriae* of Hawaii charitable trusts.<sup>29</sup>

In conclusion, the zoo entrance should not extend beyond its present fenced boundary. Any new construction should compatibly reflect the design and scale of the present zoo entrance in line with the present zoo boundary and in harmony with the historic landscape. To do otherwise will significantly impact the important historic open space landscape gracing Kapiolani Park’s “highly visible” frontage.

#### **Hardscape Impacts on the Historic Park Entrance Landscape.**

Also as shown on Figure 4 produced by Okada Trucking, the City proposes to construct wide swaths of hard surfacing surrounding and bisecting the green open space of this historic entrance to Kapiolani Park. It is unnecessary, inappropriate, and of significant negative impact to consume and compromise the historic landscape of the Park’s makai entrance with a wide linear walkway bisecting the open space, a wide perimeter swath of pavement, a street corner exceeding 2,500 square feet of heat-reflecting pavement, and two signs obtrusively erected fronting the Kapiolani Park’s historic landscape and the Kahi Hail’a Aloha burial memorial.<sup>30</sup>

The DEA states that such impacts to the historic landscape fronting the zoo will “improve visibility of and accessibility into the Zoo.”<sup>31</sup> Given that there is a wide expanse of green open space and full street exposure fronting the zoo, and the zoo visitor count exceeds 510,000 annually, or 1,500 per day, by what responsible analysis has the DDC concluded that the zoo is virtually inaccessible and invisible?

The DEA also discloses that “Parts of the walkway will be adorned with overhead trellises, and a trellis portal is shown erected in the center of the historic open space, with decorative trees of unknown species symmetrically aligning a wide linear paved surface. Traditionally arbors served to provide shade along the bare shoreline of Kapiolani Park. However, the series of vertical trellises proposed to punctuate this open space would unnecessarily and obtrusively conflict with historic character and integrity of the makai entrance to Kapiolani Park graced by an expansive green lawn and exceptional banyan shade tree canopies.

<sup>28</sup> Act 53, Session Laws of 1896.

<sup>29</sup> Circuit Court of the First Circuit, Trust No. 03-1-0018, Attorney General’s Supplemental Response to Petition for Instructions, Filed on February 25, 2003

<sup>30</sup> DEA Section 1.C.1, page 2, and Figure 4, page 9.

<sup>31</sup> DEA Section 1.C.1, page 2.

#### **> Park Entrance Improvement Alternative to Honor the Park’s Namesake in Consonance with the Kapiolani Park Historic Landscape**

Kapi’olani Park was named by King Kalakaua in honor of his Queen. The historic makai entrance to Kapiolani Park was at the intersection of Kalakaua Avenue and what is today Monsarrat Avenue, at the end of the bridge from Waikiki.<sup>32</sup> This highly visible entrance is a landscape of lawns, exceptional banyan tree canopies and the historic ironwood tree allee, together with the dynamic backdrop of Diamond Head. Clearly this historic landscape should not be compromised by oversized signs, event and commercial advertisements, wide swaths of hard-surface paving, or inconsonant vertical structures.

The 1983 Kapiolani Park Master Plan states that “Memorial statues, busts and plaques will not be considered unless the person(s) has made a substantial financial or other material contribution towards the construction of the park or facility or *has a direct relationship to the park’s historical creation or development*... King Kalakaua, Queen Kapiolani and the Honorable Archibald S. Cleghorn may be given consideration for appropriate *memorials*.”<sup>33</sup>

It is Queen Kapi’olani’s image that should be prominently honored and surrounded by graceful low plantings to compliment the historic landscape and main entrance to her Park. The presently unkempt, scarred and barren Park entrance triangle between Kalakaua Avenue and Monsarrat Avenue would be wisely considered for this purpose, simply by relocating the statue of Queen Kapi’olani presently near the Kapiolani Park Bandstand.<sup>34</sup>

#### **Demolition of the Kapiolani Park Visitor Information Kiosk**

The DDC proposes to demolish the Kapiolani Park Visitor Information Kiosk presently located on the corner of Kalakaua and Kapahulu Avenues.<sup>35</sup> In 1991 the Court ruled that “the information kiosk at Kapahulu and Kalakaua Avenues, with panels depicting the history of Kapiolani Park and announcing recreational opportunities, is a proper use under the Trust.”<sup>36</sup> Further, while not a historic structure, the Kapiolani Park Visitor Information Kiosk does reflect the Victorian architecture of the Monarchy period as established in the 1983 Master Plan and is said to be followed in the present Master Plan Update.<sup>37</sup> Thus, the proposed demolition is unnecessary because it provides a public service directly associated with Kapiolani Park, and this service should not be discontinued.

<sup>32</sup> Kapiolani Park Map dated 1883 (Brown & Monsarrat) from Government Survey Registered Map No. 1079.

<sup>33</sup> 1983 Kapiolani Park Master Plan, page 26.

<sup>34</sup> DEA Section 2.1., page 22.

<sup>35</sup> DEA Section 2.A., page 10.

<sup>36</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 8.

<sup>37</sup> DEA Section 1.B, page 1.



➤ **Alternative to Demolition of the Visitor Information Kiosk**

The Kapiolani Park Visitor Information Kiosk should be retained to provide Park users and visitors with information about the significant history of Kapiolani Park and the points of interest and Park user services in the Park. The Kapiolani Park Visitor Information Kiosk could be more properly relocated adjacent to the diamond head side of the Monsarrat Avenue intersection along the pedestrian route leading to the Kapiolani Park Bandstand parking lot.

**Walkway Widening and Unsightly Paving Alignment**

The DDC is proposing widening of the pedestrian walkway along the diamond head side of Monsarrat Avenue,<sup>38</sup> which is lined with trees from Kalakaua Avenue to Paki Avenue. Yet, there is no disclosure in the DEA pertaining to impact of this walkway widening on the root systems of these important trees. The DEA also states that the existing walkway does not meet ADA standards. Kapiolani Park is a registered historic site and may be exempt from these requirements if they impact the historic character and integrity of the Park. The DEA should include a walkway plan for any contemplated walkway widening in Kapiolani Park, and should show how such walkway widening will not impact the Park's trees.

In addition, a wide linear pathway of heat-reflecting paved surfacing is proposed to be constructed to the curb running the length of Kapiolani Park between Monsarrat Avenue and Paki Avenue. This will have a significant negative hardscape impact on the Park's historic landscape between the central green open space and the historic ironwood alley along Kalakaua Avenue. As illustrated by Figure 11,<sup>39</sup> this harsh alignment resembles an aircraft landing strip within the historic open space.

➤ **Reasonable Alternatives to Widened Walkway Blight**

The 1983 Kapiolani Park Master Plan states, "Jogging/walking paths may be provided and suitably surfaced *if feasible and only if the aesthetic appearance of the park is not affected.*"<sup>40</sup> In addition, care must be taken to avoid damaging root systems of the trees in Kapiolani Park. To ensure this, a Kapiolani Park Tree Protection Plan should be made part of the Kapiolani Park Master Plan Update.

The reasonable alternative for the needed improvement of the well-used mauka Kalakaua Avenue pedestrian pathway is that it be widened and reconfigured away from the curb to aesthetically wind between the trees and meander beneath their canopies in this vicinity. Curb-side maintenance can be addressed with a narrow utility strip.

As an alternative to mauka Kalakaua Avenue concrete pathway construction, a less invasive, low-maintenance, and environmentally-conscious cushioned pathway surfacing material, such as that manufactured from recycled tires, would be comparatively easy to

<sup>38</sup> DEA Section 1.C.2., page 2.

<sup>39</sup> DEA Figure 11, page 36.

<sup>40</sup> 1983 Kapiolani Park Master Plan, page 26.

install and less costly than the proposed outdated concrete pathway.<sup>41</sup> This relocated pathway solution a) will be an aesthetic improvement compatible with the Park's historic landscape b) will allow better accommodation of recreational pedestrian traffic, and c) will be a more pleasurable and comfortable recreational experience for Park users.

**Redevelopment of a Historic Park Road**

The DEA represents that Paki Avenue between Monsarrat Avenue and Poni Moi Road is in "substandard" condition.<sup>42</sup> In fact, Paki Avenue is a historic Park road, and this section reflects its historic scenic character and integrity. Several varieties of exceptional and important trees line both sides of Paki Avenue and create comfort and shade for park users, pedestrians and bicyclists.

It is an affront to the integrity of the Park's historic landscape to label this section of Paki Avenue as "substandard." What is substandard about Paki Avenue is that it is allowed to be used for unenforced illegal parking that damages the trees along this historic road.

The DDC's proposal to redevelop Paki Avenue with a hardscape of diagonal and parallel parking bays with raised curbing is deleterious to the historic character and integrity of this historic Park road, particularly between Noela Drive and Diamond Head Road. These proposed projects will have the ultimate cumulative effect of a significant negative impact on the Park's historic landscape, and are contrary to the DDC's claims that "The proposed improvements will not affect known historic resources" and "will not alter the historic character of the Park and the current vision of the Park."<sup>43</sup>

While the City's Department of Parks and Recreation (DPR) is rightfully cognizant of the need to protect the Park's important trees along Paki Avenue, the DDC has proceeded to propose that this historic road become an avenue of parking bays "from one end of the Park to the other"<sup>44</sup> with an unknown number of parking stalls. And while the intent apparently is to be protective of the trees, this proposal in fact diminishes the historic character and integrity of Paki Avenue as a historic Park road, which has retained its character and integrity representative of the charm and history of Kapiolani Park during the Monarchy era. Paki Avenue<sup>45</sup> should continue to remain so without compromise in accordance with the historic registration status of the Park.

It should be acknowledged in the DEA that upon approval of the 1983 Kapiolani Park Master Plan, the Paki Avenue parking lot across from the nursery was constructed as one of the first priorities of the Master Plan<sup>46</sup> to remove all parked vehicles from both sides of Paki Avenue after a child crossing between cars was killed. However, to this day wherever there is an

<sup>41</sup> SafePath Products; RubberRecycle [www.rubberrecycle.com/links3RubberRecycle.asp](http://www.rubberrecycle.com/links3RubberRecycle.asp); United Sports Surfacing of America, Inc. Software-resilient jogging trails, etc.

<sup>42</sup> DEA Section 1.C.8., page 3; Section 3.A., page 31; and Section 4.A., page 39.

<sup>43</sup> 1983 Kapiolani Park Master Plan; DEA Section 3.C., page 35, and Figure 12, page 37.

<sup>44</sup> DEA Section 3.B.3.

<sup>45</sup> Paki Avenue is referred to as "Paki Street" several times in the DEA. Please correct this to "Paki Avenue."

<sup>46</sup> 1983 Kapiolani Park Master Plan, General Priorities, Part III, page 74.

open space on the road, vehicles continue to haphazardly jockey for position in tight spaces, some with tires spinning and smoking over tree roots, as they park illegally on each side of Paki Avenue in the absence of enforcement by the City.

The DEA notes that there are 41 illegal parking stalls, which are presumably along Paki Avenue although their locations are not indicated on the Parking Map attached to the DEA.<sup>47</sup> Vehicles also illegally park between and abutting the Park's trees on Noela Drive from Paki Avenue to Leahi Avenue and along Leahi Avenue, some which rarely move. The DEA does not disclose how many parking stalls would be lost with the redevelopment of this historic Park road,<sup>48</sup> nor does the DEA mention that should diagonal parking bays be constructed along Paki Avenue, the constant stream of traffic through the Park will be blocked by vehicles backing out of these stalls.

The DEA notes that Kapiolani Park parking capacity is defined by Kapaehulu Avenue, Kalakaua Avenue, Poni Moi Road, and Paki Avenue.<sup>49</sup> As stipulated in the 1991 Court Order, "existing parking in and around Kapiolani Park for park users, if clearly marked 'For Park Users Only', is not a violation of the Trust."<sup>50</sup> (Emphasis added.) Thus, if parking in and around Kapiolani Park is not designated specifically for Park users with signage to enforce this designation, this parking would be a violation of the Trust.

In substantiation of this, the Court also ruled that "the metered parking lots at the zoo and free parking spaces at the former golf driving-range facility and Winstedt House (Paki Hale) is not a violation of the Trust since only a reasonable fee is charged at the metered parking lots and signs, clearly restricting the use of parking spaces to park users only, are posted at all of these parking locations."<sup>51</sup> (Emphasis added.)

This is a very basic principle. For example, if parking is blocked off or otherwise provided on Kapiolani Park Trust land for events or destinations outside the Kapiolani Park Trust boundaries, and for members of the public not using the Trust lands as a Park, the parking for park users would be diminished, especially during weekends and holidays, and this would be a violation of the Trust. In fact, this occurs frequently during the Waikiki "Sunset on the Beach" events, where parking for Park users has been blocked off in Kapiolani Park within the Trust land often all the way to the War Memorial in the center of Kapiolani Park for commercial food vendors and others attending this event.

Over three million people visit Kapiolani Park annually, with the vast majority of this use during weekends and holidays. The DEA states that "Most events are scheduled on a Saturday or Sunday and in some instances, both days."<sup>52</sup> Clearly, because of the legally

<sup>47</sup> DEA Figure 10, page 29.

<sup>48</sup> DEA Section 1.C.8., page 3

<sup>49</sup> DEA Section 2.K.2., page 28.

<sup>50</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 12.

<sup>51</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 13.

<sup>52</sup> DEA Section 2.A., page 10.

established allowable parking on Kapiolani Park Trust lands for Park users only, and the overly crowded conditions when events are frequently double- and triple-booked by DPR, the carrying capacity of the Park is exceeded during these times.

#### ➤ **Parking Alternative to Illegal Parking on Paki Avenue**

As the DEA notes, Paki Avenue needs to be a "safe environment for motorists, bicyclists, pedestrians, joggers and park users in general." The DEA further emphasizes that "additional off-street parking will reduce on-street parking and congested road conditions, especially along Paki Avenue."<sup>53</sup>

The City uses the Kapiolani Park nursery as a baseyard for approximately eighty (80) general service maintenance vehicles dispatched island-wide for City maintenance purposes on a daily basis. In 1991 the Court ruled that the City's vehicle maintenance facility formerly housed in the Harry Sims Bent building was a violation of the Trust because it was "not used for recreational park purposes."<sup>54</sup> The Court further held that under the Trust, "City vehicles, necessary for nursery use, may be parked overnight in the nursery, so long as those vehicles are used by City nursery staff for nursery purposes."<sup>55</sup> (Emphasis added.)

Thus, the reasonable remedy is to relocate the City's general service maintenance trucks from the utility area between the Kapiolani Park nursery and the Diamond Head Tennis Courts, and use this parking area for Kapiolani Park parking overflow. Presently this is the last possible area that could be used for Park user parking which would not impact the Park's historic landscape and open space while relocating vehicle parking from Paki Avenue.

This should not be difficult to accomplish, as it was formerly agreed by the City's Urban Forestry Division administrator, the former City Department of Parks and Recreation director, and the former State Department of Transportation director that relocating the City's general maintenance service trucks and heavy equipment to the fenced location beneath the freeway at the end of Kapaehulu Avenue would be acceptable to all parties. However, this long-awaited improvement has been sorely neglected since the City and State departments' mutual concurrence in 2003. It is time for the City to address this problem responsibly with recognition for the safety of Park users and the need to protect and preserve the historic features and landscape of Kapiolani Park, including Paki Avenue and the important trees that line this historic Park road.

<sup>53</sup> DEA Section 3.C., page 35.

<sup>54</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 15.

<sup>55</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 16.

### **Expansion of Paki Avenue Parking Lot and Bicycle and Moped Parking Areas**

The DDC is proposing an undefined number of paved off-street bicycle and moped parking surfaces to cover 400 square feet at "selected locations."<sup>56</sup> Such selected locations should be included in the DEA, as incorporated into existing surfaced parking areas and not extending into recreational or other spaces within the Park's historic landscape. Please provide the locations of these contemplated facilities.

The DDC also proposes to expand the Paki Avenue parking lot across from Paki Hale.<sup>57</sup> However, the DDC does not disclose the dimensions of the proposed surface expansion, although this would encroach farther into the central open space of the historic landscape as described in the 1992 historic registration documents for Kapiolani Park. This is an unnecessary expansion of asphalt surfacing into the historic central open space landscape, especially in consideration of the overflow parking solution described above.

Thus, any improvements to the existing Paki Avenue parking lot across from Paki Hale that served the former golf driving range should be restricted to repositioning and re-striping the existing parking spaces. Clearly, expansion of this parking surface into the historic recreational open space of Kapiolani Park was never contemplated by the Court during deliberations over parking use, nor should such expansions be otherwise undertaken.

### **Sofball Field Relocation**

The DEA states that the existing softball field #3 "should be modified by moving the entire field."<sup>58</sup> However, there is no description or depiction of said relocation. Full disclosure of this relocation should be provided for public comment in the DEA. In addition, since "temporary" structures tend to remain permanent, all backstops should be portable and required to be moved out of the Park's recreational open space when each field is not in use.

### **Drainage Improvements**

Storm water runoff often floods portions of Paki Avenue below the slopes of Diamond Head, particularly on the mauka side between Paki Hale and Monsarrat Avenue. In lieu of a drainage plan, the DDC proposes to construct long-term drainage basins in Kapiolani Park,<sup>59</sup> but the sizes and locations of such on-site detention systems are not disclosed in the DEA. Please provide the contemplated locations and sizes of such drainage basins or "other methods" together with the alignment of water conduit infrastructure for storm water flood control in Kapiolani Park.

<sup>56</sup> DEA Section 1.C.6., page 3.

<sup>57</sup> DEA Section 1.C.9, page 4; Section 1.F., page 5; and Section 3.C., page 35.

<sup>58</sup> DEA Section 1.C.4., page 2.

<sup>59</sup> DEA Section 3.C., page 38.

### **Environmental Impact Statement Must Be Required**

Given the potential significant negative impacts of the above projects proposed for the registered historic site of Kapiolani Park, it appears that the DDC would be remiss to attempt to determine a Finding of No Significant Impact (FONSI). Curiously, the DDC plays the role of a) the Proposing Agency and Applicant, b) their own Approving Authority, and c) determining their own FONSI for their proposed projects, both individually and cumulatively. In addition, it has been disclosed that the DDC prematurely submitted an "anticipated" FONSI to the State Office of Environmental Quality Control at the same time the Draft Environmental Assessment was submitted. This flies in the face of the right of public and agency comments to be reviewed prior to entertaining such a determination.

Moreover, as noted in the DEA, the State Historic Preservation Division (SHPD) is required to undertake an historic site evaluation to determine the effects of any impacts of projects proposed for the historic site, and the SHPD is required to either concur or not concur with the proposed projects<sup>60</sup> prior to implementation. Reasonably, this review would occur during the Environmental Assessment process to ensure that any required changes, including alternatives, can be included in a timely and cost-efficient manner. Chapter 6E, Hawaii Revised Statutes, mandates the following:

**§6E-8 Review of effect of proposed state projects.** (a) Before any agency or officer of the State or its political subdivisions commences any project which may affect *historic property*, aviation artifact, or a burial site, the agency or officer shall advise the department and allow the department an opportunity for review of the effect of the proposed project on historic properties, aviation artifacts, or burial sites, consistent with section 6E-43, especially those listed on the Hawaii register of historic places. The proposed project shall not be commenced, or in the event it has already begun, continued, until the department shall have given its written concurrence. The department is to provide written concurrence or non-concurrence within ninety days after the filing of a request with the department. (Emphasis added.)

The SHPD received the DEA and written request asking for "assistance in helping us to complete the environmental review process" dated May 31, 2007, and notice of the DEA was published in the OEQC "Environmental Notice" on June 8, 2007. Therefore, the SHPD must be allowed the full ninety (90) days to undertake their historic site evaluation to determine the effects of the projects proposed for the Kapiolani Park Master Plan Update. Curiously, the DDC has implied that if the SHPD does not conform to the lesser public review period of thirty (30) days, the DDC will not include the SHPD review and comments in the Final Environmental Assessment. This appears to fly in the face of not only the spirit and intent of State law, but in fact its directive.

<sup>60</sup> DEA Section 3.B.4., page 34.

Further, by State law the DDC is required to not segment projects to be undertaken within the larger project in the Special Management Area.<sup>61</sup> Therefore the cumulative impact of the various projects proposed for the Kapiolani Park Master Plan Update must be applied.<sup>62</sup>

Finally, the several traffic circulation alternatives provided by the DDC in the DEA are concepts apart from the proposed projects, which do not contemplate traffic circulation. The concept of a municipal "transit mall" is especially alien to the Kapiolani Park Master Plan's objectives in recognizing the historic and recreational significance of Kapiolani Park, as emphasized under Section 2.J on page 25 of the DEA. In fact, the Court ruled that "the addition to Kapiolani Park of *unobtrusive* bus stops or bus facilities, as an *accessory use of Kapiolani Park to assist park users* to get to Kapiolani Park, is not a violation of the terms of the Trust."<sup>63</sup> Further, as previously noted, use of Kapiolani Park Trust land for commercial or general municipal uses are not within the provisions of the Trust.<sup>64</sup>

Available alternatives directly related to the proposed projects within the DEA have been provided herein. Chapter 343, Hawaii Revised Statutes, states the following under Applicability and Requirements for Environmental Assessments:

#### §343-5 Applicability and requirements.

- (a)(1) ...the agency shall consider environmental factors and available alternatives in its feasibility or planning studies. (Emphasis added.)

Given the potential significant negative impacts of a) the proposed zoo entrance expansion and storefront encroaching into the open-space footage of the Kapiolani Park historic landscape; b) the mauka Kalakaua Avenue linear walkway widening from the curb, and expansive paved areas within and around the historic landscape of the Park's entrance; and c) the redevelopment of Paki Avenue, a historic park road within the boundaries of the Trust - a full Environmental Impact Statement process for the proposed projects should be required and undertaken to ensure full disclosure of the significant negative impacts, remedies thereof, and appropriate alternatives thereto.

<sup>61</sup> DEA Section 2.J, page 23; DEA Special Area Management Map, Figure 8, page 26; and §205-A.4.a and b; §205-A.22, and §205-A.26(2)(A), HRS.

<sup>62</sup> DEA Section 8.8, page 50.

<sup>63</sup> Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991, Conclusions of Law at 4.

<sup>64</sup> Attorney General's Supplemental Response, Hawaii Circuit Court of the First Circuit, Trust No. 03-1-0018, dated April 27, 2006, and Amended Findings of Fact and Conclusions of Law and Order, S.P. No. 89-0015, dated June 28, 1991.

#### E. Proposed Projects Long Needed to Improve the Appearance Kapiolani Park Utility Line Undergrounding

The overhead utility lines and their unsightly poles along the perimeter of Kapiolani Park have been a long-standing blight on the historic landscape. These utility lines should be buried as the First Priority Kapiolani Park Improvement without further delay. The City Council should ensure the necessary funding along with the utility providers' share to ensure that this project is accomplished within the next fiscal year. In addition, the standard light poles that have been replaced with Victorian period Park lighting fixtures should also now be removed to unclutter the historic landscape. As stated in the DEA, "The views of the Park, Diamond Head, Waikiki Beach, and residential areas around the Park will be improved by removing the aerial clutter."<sup>65</sup>

The DEA states that "*Moss* existing trees will not be affected by the proposed improvements unless they are dead, dying or diseased. If in any of these conditions, they will be removed."<sup>66</sup> (Emphasis added.) The former statement suggests that trees in Kapiolani Park other than those determined to be dead, dying or diseased also will be removed. The DEA should disclose what trees are determined by an independent professional arborist to be dead, dying or diseased, and what mitigation measures must be implemented during burial of the utility lines or any other Park projects to ensure the safety and survival of the Park's historic, exceptional and important trees, respectively. Further, the Diamond Head Special District ordinance for the Diamond Head core area, in which Kapiolani Park is located,<sup>67</sup> requires that any tree that is removed must be properly replaced, especially within this historic site.

#### Park Building Restoration for Adaptive Reuse

The building on Paki Avenue that now serves as a Park maintenance headquarters was designed in the 1930's by Harry Sims Bent, who was noted for his park architecture at Ala Moana Beach Park, buildings at Oahu College (Punahou School) and Kamehameha School,

<sup>65</sup> DEA Section 1.C.7., page 3.

<sup>66</sup> DEA Section 3.B.5., page 34.

<sup>67</sup> DEA Section 2.J., page 23; DEA Diamond Head Special District Map, Figure 9, page 27; and the Land Use Ordinance of the City and County of Honolulu:

Sec. 21-9.40-3 Prominent public vantage points.

The prominent public vantage points from which significant public views of Diamond Head exist are the following:

(b) Public Viewing Sites.

(2) The beaches extending from the Ala Wai Yacht Harbor to Sans Souci Beach.

(3) Kapiolani Park.

(4) Honolulu Zoo.

Sec. 21-9.40-4 Design controls.

Implementation of the district objectives shall consist primarily of landscaping requirements, height limitations and architectural design review. Specific regulations are enumerated below.

(a) Landscaping.

(9) Any tree removed which is visible from any street, park or other public viewing area identified in Section 21-9.40-3(f) shall be replaced by an approved tree of a minimum two-inch caliper... (Emphasis added.)

and the University of Hawaii's Pineapple Research Institute, which was highly regarded for its native Hawaiian design aesthetic. The Paki Avenue building was the first entrance building for Kapiolani Park, but over the years this building has been structurally altered and ultimately neglected by the City. This building is eligible for the Hawaii Register of Historic Places, and care should be taken to restore it to its original form and character. It will therefore be essential for a historic architect to oversee restoration of the Paki Avenue park maintenance building.<sup>68</sup>

#### **Passive Picnic Areas to Replace the Kalakaua Avenue Softball Field**

Restoring the open space known as "Elks Field" to passive use with additional shade trees will enhance this area and provide an opportunity for more Park users to fully enjoy this portion of the Park along mauka Kalakaua Avenue near Dillingham Fountain.<sup>69</sup>

#### **Continuing Long-Term Acquisition of Kapiolani Park Residential Lots**

A dozen small residential lots between Paki Avenue and Leahi Avenue remain to be acquired for inclusion in the Park for recreational purposes. This policy was initiated several decades ago<sup>70</sup> and remains today as the City's and the community's common objective to expand Kapiolani Park's recreational use and improve the Park's appearance.<sup>71</sup>

Such acquisition can be continued only when there is agreement between the City and the present property owners or their heirs and successors. As an example, the owner of 3806 Paki Avenue (TMK 3-1-26:14) conveyed her property to the Trust reserving her lifetime use. Upon her death in the 1990's, the property was to have reverted to the Trust. But this apparently has not occurred because the property continues to be privately occupied, although the fee title is presently listed under the City. However, in 1998 the Court ordered this parcel to be conveyed into the Trust by the City in partial compensation for the use of Kapahulu Avenue for municipal street purposes.<sup>72</sup> Therefore, TMK 3-1-26:14 should be identified as part of Kapiolani Park and within the Kapiolani Park Trust boundaries on Figures 2, 3, 5-10, and 13-16,<sup>73</sup> and converted to Park use in accordance with the owner's wishes and subsequent Court order.

<sup>68</sup> DEA Section 1.C.11., page 4 and Section 2.A., page 17.

<sup>69</sup> DEA Section 1.C.3., page 2.

<sup>70</sup> Kapiolani Park Master Plan Study dated December 14, 1975.

<sup>71</sup> DEA Section 1.C.10, page 4.

<sup>72</sup> Amended Stipulation and Order Transferring Land to the Kapiolani Park Trust and Implementation Table, S.P. No. 89-0015 dated June 19, 1998, and 1982 Kapiolani Park Consolidation Map.

<sup>73</sup> DEA Figures 2, 3, 5-10 and 13-16, pages 7, 8, 11, 12, 21, 26, 27, 29, and 42-45.

## **F. Omissions in the DEA**

### **Endangered Species Habitat**

The DEA refers to a "sooty tern" as having a habitat in Kapiolani Park, and represents that there are no threatened or endangered flora or fauna in Kapiolani Park.<sup>74</sup> However, the DEA neglects to recognize that Kapiolani Park is a known habitat for the White Tern (formerly White Fairy Tern), an endangered species. The White Tern has been known to nest in the Ironwood Tree Grove and a tree at the Outrigger Canoe Club. The DEA should disclose what mitigation measures must be implemented to not disturb the endangered White Tern's habitat during removal of overhead utilities on the vicinity of the Ironwood Grove.

### **War Memorial Open Space**

The Natatorium is registered separately from Kapiolani Park on both the National Register of Historic Sites and the Hawaii Register of Historic Places. While the "living" portion of the War Memorial extended into submerged lands, the original War Memorial landscape in Kapiolani Park consisted primarily of lawns and coconut palms, date palms along the Kalakaua Avenue sidewalk, two cannons flanking the Roll of Honor Memorial, hau tree arbors along the rock wall fronting the Natatorium, two banyan trees and a kaimani nut tree. Flood lights illuminated the Natatorium façade and highlighted two reflecting pools on either side of the entrance. This significant frontage has been more recently encroached upon by a volleyball court and a parking lot.

In the late 1990's the community consulted with noted landscape architect Julie Kimura Walters regarding the landscape restoration plan for the Park's War Memorial area, resulting in the following:

- Restoration of lawn areas and installation of automatic irrigation;
- Restoration of coconut palm groves (many trees have been lost and not replaced);
- Protection and preservation of the exceptional banyan and kaimani nut trees;
- Protection and preservation of the historic date palm trees;
- Restoration of the hau tree arbor along the seawall, including lighting and extension of the Kapiolani Park promenade through the arbor and along the Sans Souci beach front to connect with the walkway to Kalakaua Avenue at the Kaimana Beach Hotel;
- Return of two cannons flanking the Roll of Honor War Memorial;
- Recreation of the original oval driveway marked with original curbstones, and removal of the existing dead-end service road;
- Restoration of the circular reflecting pools or similar water features to restore the architectural integrity of the arched Natatorium structure;
- Pave all seawall promenade and War Memorial walkways with stone surfacing;
- Replace all park furniture and fixtures with those reflecting the historic era of the 1920's.

<sup>74</sup> DEA Section 2.A., page 14; Section 2.H., pages 19 and 20; and Section 3.A, page 31.

The DEA illustrates that the War Memorial portion of Kapiolani Park and the "Natatorium site improvements" are "to be determined pending additional studies,"<sup>75</sup> and does not mention any future improvements to the War Memorial portion of Kapiolani Park or the Natatorium in the text. However, to integrate these improvements at a later date would constitute project segmentation respecting the War Memorial portion of the Park's Trust land.<sup>76</sup>

In addition, the DEA states that the Honolulu Zoo and Waikiki Shell are not included in the Master Plan Update and are thus excluded from the DEA.<sup>77</sup> While the Honolulu Zoo, an allowed use under the Trust as an "exhibition," and the Waikiki Shell, an allowed use under the Trust for "entertainment", are managed separately by the City's Department of Enterprise Services, they remain within the Kapiolani Park Trust and registered historic site of Kapiolani Park, as is the War Memorial portion of the Park. Thus, any incremental plans for the Honolulu Zoo, Waikiki Shell, and War Memorial portion of Kapiolani Park should be part of the larger Kapiolani Park Master Plan in view of potential cumulative impacts on the historic property.

#### **Kalaka'ua Avenue Ironwood Allee**

The ironwood allee framing Kalaka'ua Avenue beginning at the entrance to Kapiolani Park is a remaining full-length main Park road historic landscape feature from Monsarrat Avenue to Poni Moi Road, not merely a "remnant of a former carriage road..." as speculated in the DEA.<sup>78</sup> This historic landscape feature dates from the original Kapiolani Park landscape plan by Archibald Cleghorn, when the ironwood allee was designed and planted to line the main Park road on both sides extending from the bridge that crossed the lagoon inlet from Waikiki.<sup>79</sup>

This exceptional allee grew and survived solely due to the dedicated efforts of Kapiolani Park water carriers prior to the transfer of the Park's day-to-day management to the City in 1913. However, due to neglect, poor maintenance, and devastating tree topping within the past two decades, a multitude of these majestic trees have become disease-infested and have had to be removed. Restorative replacement and companion planting of ironwood saplings within the historic allee was made possible in the mid-1990's by a private bequest from the late niece of William G. Irwin, Alice Spalding Bowen.

Sadly, the heartbreaking butchered trimming and deforming of the Park's trees continues to this day in and around Kapiolani Park, especially along overhead utility lines. While the DEA emphasizes the 1983 Kapiolani Park Master Plan's recognition that the "entire collection of trees is significant" and "several specimen banyan trees, trees along Monsarrat

<sup>75</sup> DEA Figure 3, Page 8.

<sup>76</sup> Amended Stipulation and Order Transferring Land to the Kapiolani Park Trust and Implementation

Table, S.P. No. 89-0015 dated June 19, 1998

<sup>77</sup> DEA Section 1.A., page 1.

<sup>78</sup> DEA Section 2.H., page 20.

<sup>79</sup> Kapiolani Park Map dated 1883 (Brown & Monsarrat) from Government Survey Registered Map No. 1079.

and the numerous shower and coconut trees are important",<sup>80</sup> butchered trimming continued as recently as June, 2007, along the Diamond Head side of Monsarrat Avenue between Kalaka'ua Avenue and Paki Avenue. The DEA should address a Kapiolani Park Tree Protection Plan to thwart this abuse.

#### **"Sunset on the Beach"**

Prior to undertaking the construction of Waikiki Beach, the Territory of Hawaii entered into Waikiki Beach Reclamation Agreement in 1928 with all shoreline landowners between the Ala Wai Canal to the site of the present Elk's and Outrigger Canoe Clubs adjacent to Kapiolani Park. This contract stipulates in no uncertain terms that in exchange for a beach expansion of these properties for public use the owners would not obstruct the new beach in any way.

In accordance with Act 273, 1927, the Waikiki Beach Reclamation Agreement states the following: "(T)he general public shall be assured of the right to use such portion of any beach built as lies within seventy-five (75) feet shoreward of the mean high water mark" and the Territory "will not erect or place upon the beach any building, wharf, structure, machine, or other obstruction of any kind...except such retaining walls, groins or other structures as may be necessary for the preservation of that part of the beach as may be deemed practicable within the meaning of this agreement...and will, subject to the above exception, forever thereafter keep the beach free and clear of obstructions and open for the use of the public as a bathing beach and for passing over and along the same on foot..."; and the property owners "will at no time prevent such beach in front of their respective premises from being kept open for the use of the public as a bathing beach and for passing over and along the same on foot..."(T)his agreement... shall be binding upon and inure to the benefit of the parties hereto and their respective heirs, successors and assigns." <sup>81</sup> (Emphasis added.)

The "Sunset on the Beach" movie screen structure obstructing the public beach area fronting the entrance to Kapiolani Park is clearly a violation of this legal contract that runs with the land. This structure, once claimed to be "temporary," has in fact become a permanent fixture encroaching on the public beach. The movie screen skeleton, platform and anchors are only approximately twenty-six (26) feet from the water line, and consume over 1500 square feet of sandy public beach at the foot of Monsarrat Avenue, with the platform alone consuming 850 square feet of public beach. The movie screen skeleton further obstructs the significant Diamond Head view plane as viewed from Waikiki. In addition, commercial use surrounds this area on a monthly basis for the purpose of promoting Waikiki restaurants with food sales, and Kapiolani Park parking, "for park users only" along the section of Kalaka'ua Avenue that remains a historic road Park road within the Kapiolani Park Trust, is frequently barricaded to the War Memorial area for the use of commercial food vendors and others associated with this Waikiki event,<sup>82</sup> in violation of the Trust.

<sup>80</sup> DEA Section 2.H., page 20.

<sup>81</sup> Waikiki Beach Reclamation Agreement dated October 19, 1928.

<sup>82</sup> DEA Section 2.A., page 14 and Photograph 2, page 14.

### **Summary of Important Available Alternatives**

The several traffic circulation alternatives provided in the DEA are concepts apart from the proposed projects, and do not address environmental alternatives disclosure for the proposed projects. The following available alternatives directly address and remedy the significant negative impacts of the proposed actions in the DEA:

#### **Alternative to Altering the Kapiolani Park Trust Boundary**

The Kapiolani Park Trust boundary is established in perpetuity under the contractual charitable Trust and cannot be changed. The Master Plan must recognize this boundary in light of the 1988, 1991, and 1998 Court decisions.

#### **Alternative to the Proposed Obitrusive Structures and Hard Surfacing Within and Around the Historic Landscape at the Kapiolani Park Makai Entrance**

Ensure that the historic green open space landscape frontage of the interior makai entrance to Kapiolani Park shall be protected and preserved without intrusion of obtrusive signage, paved lawn areas, or introduced structures. Honor the Park's namesake with her image at the entrance to Kapiolani Park.

#### **Alternative to Encroachment of a Zoo Entrance and Storefront Structure into the Historic Landscape**

The Honolulu Zoo is a separate use and facility occupying Kapiolani Park Trust land. The zoo must remain within its present confines to ensure that there is no impact to the surrounding historic landscaped open space of the Park. Ensure that the existing entrance building shall be retained and that any entrance improvements are within the present zoo boundary and compatible with the existing entrance in placement, design and finish materials.

#### **Alternative to Proposed Redevelopment of an Historic Park Road**

Paki Avenue is a historic Park road that must rightfully be protected and preserved. Redeveloping this historic Park road into a reconfigured parking area, whether with diagonal or parallel parking bays, will have a significant negative impact on this registered historic landscape. The just and reasonable alternative to such extreme alteration of this historic Park road is to remove the City's general service maintenance vehicles from the Kapiolani Park nursery area adjacent to the Diamond Head Tennis Courts, and use this area for overflow parking.

#### **Alternative to the Proposed Linear Widened Walkway Blight**

Widen, reconfigure and integrate an improved pedestrian pathway within the historic landscape along mauka Kalakaua Avenue. A wider non-invasive pedestrian pathway meandering between the Park's trees and beneath their canopies will more comfortably accommodate recreational pedestrian traffic for the greater enjoyment of Kapiolani Park users.



April 10, 2008

Michelle S. Matson, President  
Kapiolani Park Advisory Council  
c/o 3931 Gail Street  
Honolulu, Hawaii 96815-4502

Dear Ms. Matson:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the Kapiolani Regional Park Master Plan Update. Our responses to your comments are offered in the order they were presented.

**A. Kapiolani Park Trust Boundary**

On June 19, 1998, the Circuit Court approved the Amended Stipulation and Order Transferring Land to the Kapiolani Park Trust and Implementation Table ("Order") which authorized the exchange of City and County of Honolulu and State of Hawaii lands in "substitution of [Waikiki Fire Station, Kapahulu Avenue, and portions of Jefferson Elementary School]" lands used for purposes inconsistent with the Kapiolani Park Trust. The Order further directed the City and State to "undertake all actions necessary including the compliance with all regulations and subdivision ordinances to implement the exchange of [these] lands..." Thus, these properties are no longer included within the boundaries of the Kapiolani Park Trust.

See also the response to your comment concerning Continuing Long-term Acquisition of Kapiolani Park Residential Lots.

**B. Registered Legal Name of "Kapiolani Park"**

The Draft Environmental Assessment ("DEA") acknowledges that the park was originally known as Kapiolani Park and also states the reasons for using the name Kapiolani Regional Park. The park is presently administered, managed, and maintained by the City and County of Honolulu Department of Parks and Recreation (DPR) and uses Kapiolani Regional Park to describe the area that is addressed under the Master Plan Update.

**C. Established Objective to Retain the Park's Historic Character**

Within the context of the overall historic theme envisioned by the 1983 Master Plan, the "goal of the proposed improvements is to make the Park experience more "user-friendly, safer, and accessible to all who visit and recreate at this green jewel" (Section 1, B. Objectives of the Kapiolani Regional Park Master Plan).

Kapiolani Park Advisory Council  
April 10, 2008  
Page 2

**D. Proposed Project Segments with Potential Significant Negative Impacts**

Municipal Zoo Entrance Expansion Impacts

The planned new Honolulu Zoo Entry is located on Kapiolani Park Trust lands as is the entire Zoo. The City has worked with community interest groups and individuals, and most of them recognize the need for a new entrance and the challenges faced by the City. Some minor adjustments have been to the Park master plan at the Zoo entrance and are shown in Figure 4 of the Final Environmental Assessment (FEA).

It has long been recognized that the existing entrance is not optimal in terms of visibility and wayfinding. A new entry for the Zoo was proposed in the Honolulu Zoo Master Plan (Jones and Jones, 1984), a master plan update (Brong, 1993), and disclosed in the Environmental Assessment for the Honolulu Zoo Master Plan (Belt Collins Hawaii, 2000).

The major deviation from the 1984 Master Plan and subsequent updated plans for the Zoo is that the existing entrance building will be left in place. All previous plans identified that the existing entrance would be removed.

There is also recognition of the need for a sign to identify Kapiolani Regional Park. The sign would be placed in the general location now occupied by an information kiosk. Conceptually, the sign would be wall mounted or cast in a low curved wall. The wall would be less than 24-inches in height so as to not obstruct views into the Park.

Demolition of the Kapiolani Park Visitor Information Kiosk

The visitor information kiosk is proposed to be demolished. The kiosk is not staffed daily. People seeking information at the kiosk are asking for information about the location of the Honolulu Zoo entrance, the Aquarium, and other visitor-related establishments in Waikiki, and not for information about Kapiolani Regional Park.

Walkway Widening and Unsightly Paving Alignment

Measures to mitigate potential impacts on tree roots were disclosed in the DEA (Section 3, Item 5, page 34). The DEA, however, discussed mitigating measures in areas proposed for street improvements and the underground routing of utility lines. It did not include walkway widening. The FEA, therefore, will be revised to include walkway widening as having potential impacts on tree roots where walkways are proposed. Since the extent of tree root systems are not known at this time, the DEA proposed retaining a certified arborist to recommend measures for root pruning and for protecting root systems.

The existing walkway on the Diamond Head side of Monsarrat Avenue would be widened as disclosed in the DEA (Section 1, Item 2, page 2 and Figure 3, Master Plan).

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The walkway widening will avoid the existing trees and with the aid of a certified arborist minimize construction impacts on the tree's root system. The ground surface between the walkway and curb is well trodden indicating that people are walking off the walkway and that it is of insufficient width. Alternate configurations such as a meandering alignment may have a greater impact on existing trees in the area. A linear pathway is preferred by the Department of Parks and Recreation (DPR) who has the responsibility for maintaining the park.

Generally, all areas and facilities within a historic site are required to meet Americans with Disabilities Act (ADA) requirements to the extent that the area and facilities are open for public use.

Your suggestion of alternative walkway construction materials is acknowledged. However, the suggested alternative pathway construction using material from recycled tires is much higher in cost and requires the same concrete construction foundation, base, and sub-base, as typical concrete walkway construction. This type of construction is currently employed around our newer parks' children play equipment. Nevertheless, the City may consider such an alternative surfacing material for walkways or jogging paths in its parks, including Kapiolani Regional Park.

Kapiolani Park Tree Preservation Plan

The City does not have a tree protection or tree preservation plan for Kapiolani Regional Park. Tree protection, preservation, and trimming should be addressed in a park management plan rather than a master plan.

Redevelopment of a Historic Park Road

It is acknowledged that Paki Avenue is a historic park road. Other park roads such as Monsarrat Avenue and Kalakaua Avenue have been improved to City standards with curbs, gutters, and sidewalks. Paki Avenue between Monsarrat and Kapahulu Avenues also is built to City standards.

Paki Avenue improvements will be planned and designed to address the issues of traffic flow and public safety according to professionally acceptable standards. Diagonal and parallel parking bays depicted in Figures 3 and 12 are shown as possible configurations where feasible. The Master Plan Update does not propose raised curbing to mark the edge of the roadway. The term curbing was used to allow flexibility in the design of the road improvements.

Regarding your comment concerning the proposed diagonal parking along Paki Avenue, there are many diagonal parking stalls presently along Kalakaua Avenue that require traffic to slow or come to a stop as vehicles back out. Although an exceptional condition for public parking on this island, it is legal, and experience has not shown it to be a problem. Vehicular traffic is thus compelled to maintain a slow rate of speed while traversing this street.



Approximately 41 illegal parking stalls will be removed. The vehicles parked at the Kapiolani Park nursery grounds are used for nursery purposes, compliant with the 1991 Court Order. Stiling of the nursery on Trust property was permitted by the Court so long as the nursery and the plants were used for City park purposes.

The DPR has explored with the State Department of Transportation (DOT) parking alternatives for the vehicles used by its Division of Urban Forestry (DUF) presently being parked overnight in the nursery portion of the Park. That discussion included such sites as the area under the freeway at Kapahulu Avenue recommended in your letter. Unfortunately, this area and other suitably located lands are occupied by vehicles of other City and/or State agencies and are not available at this time for Park maintenance vehicle use.

Expansion of Paki Avenue Parking Lot and Bicycle and Moped Parking Areas

Four bicycle and moped parking areas are proposed. The location of the parking areas are shown in Figure 3 Master Plan.

The existing parking lot *makai* of Paki Hale will be redesigned and reconfigured but not expanded in coverage.

Softball Field Relocation

Softball fields Nos. 1 and 3 will be adjusted several feet from their existing locations. The actual distance will be determined during the design stage. This is undertaken to accommodate portable backstops that will enhance public safety. The proposed adjustment of these fields is symbolically indicated on the Master Plan in Figure 3.

Drainage Improvements

The DEA stated that "storm water would be directed to open space areas for percolation into the ground and evaporation or temporarily stored in on-site detention systems with controlled release to the municipal drainage system." The statement was made in reference to runoff generated from the proposed improvements. On-site detention systems do not mean concrete drainage basins but open space areas in the Park used to detain runoff. Runoff from the proposed improvements also could be discharged into underground percolation systems as an alternative to unconfined flow into open areas.

Environmental Impact Statement Must Be Required

The filing of a DEA requires an anticipated determination. A final determination will be made after all comments received during the DEA comment period have been reviewed.

The Department of Design and Construction is not excluding the State Historic Preservation Division (SHPD) from commenting on the Master Plan Update. Chapter 343, Hawaii Revised Statutes, provisions setting deadlines for commenting on published

actions apply to all parties, private and governmental alike. The Chapter 6E, HRS, provisions are not applicable to the Chapter 343, HRS, environmental disclosure process.

SHPD will be given the 90 days to review any of the improvements proposed in the Master Plan Update at the completion of the design phase of any improvement project and prior to commencing with the action. It is also anticipated that the design consultant will seek input from SHPD during the design process itself.

The commenter cites no example of an attempt on the proponent's part to "segment projects to be undertaken within the larger project in the Special Management Area." A response, therefore, cannot be provided to this comment.

The comments concerning the transit mall are not relevant as the traffic circulation alternatives considered were ultimately rejected for a variety of reasons unrelated to the historical status of the Park. The traffic circulation alternatives would have had important implications for other proposals in the Master Plan Update, had any of them been adopted. Within the context of the proposed Park improvements in the Update, the available alternative is essentially not to implement any of the improvements. This alternative was discussed in the DEA on page 39.

The commenter's difference of opinion on the significance of anticipated environmental impacts and consideration of alternatives is acknowledged. The DDC believes it is an opinion not shared by the larger community. The proponents of this Park Master Plan Update have complied with the requirements of the HRS Chapter 343 regarding consideration of available alternatives to the proposed action and fulfillment of environmental disclosure requirements.

#### **E. Projects Long Needed to Improve the Appearance of Kapiolani Park**

##### Utility Line Undergrounding

Your statement of opinion concerning the urgency of placing utilities and park lighting fixtures underground is acknowledged. The City's executive branch's administrators, however, have the responsibility for determining the timing for improvements based upon the full slate of improvements needed City and County-wide, and the City Council has the responsibility for determining funding of those proposed slated improvements each year.

The DEA states "Most existing trees will not be affected by the proposed improvements unless they are dead, dying, or diseased. If in any of these conditions, they will be removed". The statement applies to trees affected by the proposed improvements and not all trees in the park. Your interpretation that trees in Kapiolani Park other than those determined to be dead, dying or diseased also will be removed is incorrect.

As stated in the DEA, a certified arborist will be retained to recommend measures for root pruning and for protecting root systems.

##### Park Building Restoration for Adaptive Reuse

Renovating the Maintenance Building is recommended by the Master Plan Update. Your statement of opinion concerning the historic nature of the architecture of the park maintenance building is acknowledged.

##### Passive Picnic Areas to Replace the Kalakaua Avenue Softball Field

This action is proposed in the Master Plan Update. Your statement of opinion about this area is acknowledged.

##### Continuing Long-Term Acquisition of Kapiolani Park Residential Lots

The City and County of Honolulu is the owner of Tax Map Key 3-1-026: 014. According to the deed, the City will only obtain full use of the property after the demise of the present occupant(s), which has not yet occurred. This parcel (among other residential lots in this area) became part of the Kapiolani Park Trust as a result of the June 19, 1998 Order of the Circuit Court, previously referenced, involving the exchange of lands. The relevant figures in the FEA will be corrected to accurately reflect this.

#### **F. Omissions in the DEA**

##### Endangered Species Habitat

It has not been confirmed whether the ironwood grove supports habitat for the sooty tern, a common bird species, or the white tern, a listed endangered species in Hawaii.

In general, there are no overhead utility lines passing through the grove of ironwood trees or the side of the road of the ironwood grove. Overhead utility lines along the southbound lanes of Kalakaua Avenue are on the makai side of the road between the Dillingham Fountain and Poni Moi Road; utility lines along the northbound lanes of Kalakaua Avenue are on the mauka side of the road between Poni Moi Road and the Dillingham Fountain. Several lines pass overhead in the vicinity of Dillingham Fountain just to the north of the ironwood grove.

The ironwood grove will not be directly disturbed during construction since there are no overhead lines passing through the grove along Kalakaua Avenue. Overhead lines that pass just to the north of the grove can be removed or placed underground without disturbing the trees and bird nests. Construction can be scheduled to coincide when the birds are not in their nesting season if they indeed nest in the ironwoods. An ornithologist can advise when the nesting season takes place and also recommend measures for minimizing impacts on birds and their habitats in this area during construction.

War Memorial Open Space

A plan for the Waikiki Natatorium and War Memorial Open Space is being prepared under a separate City contract. When those plans are ultimately completed, the Park Master Plan will be updated again. The Honolulu Zoo and the Waikiki Shell ("Shell") are administered separately as independent entities by the City's Department of Enterprise Services (DES). By contrast, the City's DPR operates and maintains all other recreational lands and facilities within the Park. Historically, the Zoo and Shell properties have had their respective plan updates and approval process conducted separately for reasons of administrative practicality. The currently approved plans remain in force for each. Therefore, no project segmentation will occur, as claimed.

Your statement of opinion concerning desired improvements to this area of the Park is acknowledged.

Kalaka'ua Avenue Ironwood Alley

The City does not have a tree preservation or tree protection plan for Kapiolani Regional Park. Tree protection, preservation, and trimming should be addressed in a park management plan rather than a master plan.

Sunset on the Beach

The Sunset on the Beach features referred to are existing structures, and not improvements being proposed as part of the Master Plan Update, and therefore not a subject of this DEA. A response is not required.

Summary of Important Available Alternatives

Thank you for the alternatives you offered for several of the improvements proposed in the Master Plan Update. However, the statute's legal definition of "available alternatives" is not how you understand the term. The preparers of the DEA are under no legal obligation to consider the alternatives you offer.

The participation of the Kapiolani Park Advisory Council in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER



Gerald Park

c: T. Hildebrand, DDC



**City & County of Honolulu**  
**Diamond Head/Kapahulu/St. Louis Heights**  
**Neighborhood Board No.5**  
c/o Neighborhood Commission Office  
530 So. King Street, Room 400  
Honolulu, Hawaii 96813

July 24, 2007

**Neighborhood Board No. 5 Task Force Report**

**Pertaining to the Kapiolani Park Master Plan Update - Environmental Assessment**

**Background.** A Board Task Force was commissioned by Neighborhood Board No.5 - Diamond Head, Kapahulu, St. Louis Heights, to review, digest and offer concerns on behalf of the board due to the statute driven suspense dates that occurred between regular board meetings, and to prepare a resolution for the full board to consider at the August 9, 2007 meeting. The Task Force concerns are listed below.

**Task Force Concerns:**

1. The Kapiolani Trust Boundaries illustrated on the graphic attachments of the plan are extremely difficult to comprehend and seem to differ from previous reference plans. The trust boundaries must be restored to those that were originally established and confirmed through litigation. Further, there apparently have been land added to the trust, to compensate for improper use of some original land (i.e. the Waikiki Fire Department, etc.), and some areas are encumbered with clouded titles.

The requirement for clarity in illustrating the correct boundaries is due to the conditional use of these lands when the trust was established. The intentional or accidental violation of the use of trust lands has been the subject of costly litigation in the past, and will continue if the boundaries are not clearly illustrated.

In addition, the conditions that were agreed to in the use of the trust lands seem to have been suppressed and not documented adequately in this plan update.

2. The planned new Honolulu Zoo entrance seems to intrude into the conditional use Kapiolani Trust lands. The justification based on the concept that visitors cannot find the entrance is ludicrous. If one would take the time to review the numerous free tourist publications that are found in many street dispensers and hotel lobbies, you would find that locating the zoo is not a problem for our visitors.

When an architectural illustration of the planned zoo entrance was presented to the board, many members commented on the grotesque design. We believe that the original master plan established a Hawaiian-Victorian theme for Kapiolani Park. The Kapiolani Park Bandstand, the Kalakaua information kiosk and some street lighting standards with flower baskets are symbolic of this theme. Perhaps in the near future we will be able to revert back to the original architectural concepts.

Further, the commercial use of this trust land may be in violation of the conditional use.

3. The planned Paki Avenue renovation with additional parallel and diagonal parking should be approached with caution. Paki Avenue is used as a major traffic thoroughfare and street parking will create traffic hazards, with park visitors backing in and out of stalls or waiting for parking spaces. Bike paths and dated walkways should be carefully planned. In addition, any renovation should consider the incorporation of the present nostalgia as manifested by the installed standards and chains bordering the park and other links to the history of the park.

An audit in the use of park lands as a nursery and a parking lot for large city vehicles not solely used to

maintain the park should be commissioned. While the nursery operation may be of benefit to the park, the storage of city vehicles that service the public outside of the park boundaries are probably a violation of trust lands. The public would be better served if this area was converted to use as a public parking lot.

The alternate plan suggestion to close off portions of Monsarrat Avenue should be reconsidered. This avenue is another major thoroughfare and a traffic study will confirm its use.

4. The planned construction of trellises and increased paved walkways, while somewhat visually pleasing, will increase the maintenance responsibilities for the parks and recreation department. Maintenance of the trellises, pathway edging and other associated pruning, watering and associated requirements will be taxing to the department.

Many metropolitan cities have turned to recycled rubber tire pads which are a preferred method to create pathways. Unlike concrete pathways, these recycled rubber tire pads are environmentally friendly, do not damage tree roots and provide a cushioned surface for joggers. Also, it establishes a use for discarded vehicle tires which are a major refuse problem.

5. Added attention should be placed in controlling the drainage requirements of the park. Addition of top soil to elevate the depressed areas of the park and a functional drainage system is warranted. Currently, the drainage ditch between the Waikiki Shell and the corner parking lot is polluted and might cause a health hazard.

With the expansion of the pathway system and other covered areas, the fragile subterranean limestone caves and aquifer beneath the park should be studied. The plan update might have an adverse impact on the aquifer.

6. There are no provisions in the plan update to facilitate the probable construction of a rail transit terminus. If the rail transit is projected to service Waikiki in the future, the specifics need to be in the plan.

In summary, the task force offers these concerns in advance on behalf of the board, and the board will follow with a resolution. We have an opportunity to plan for a unique Hawaiian-Victorian themed park and zoo that will continue the legacy of King Kalakaua and conform to the conditional use of the Kapiolani Trust lands.

Mahalo nui loa, to Mr. Gerald Park, Urban Planner, and to Mr. Terry Hildebrand, C&C Department of Planning and Construction, for their assistance to the task force.

**Task Force Members:**

Board Chairman Narita  
Vice Chairman Chang  
Guest Daisy Mural

Board Member Drown  
Board Member Persons

Board Member Matson  
Board Member Wong

Respectfully submitted,

**Bert T. Narita, Chairman**  
**Neighborhood Board No.5**



April 10, 2008

GERALD PARK  
Urban Planner

Planning  
Land Use  
Research  
Environmental  
Studies

Bert Narita, Chair  
Diamond Head/Kapahulu/St. Louis Heights  
Neighborhood Board No. 5  
c/o Neighborhood Commission Office  
530 South King Street, Room 400  
Honolulu, Hawaii 96813

Dear Mr. Narita:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. We offer the following responses to your comments in the order that they were presented.

Task Force Concerns

1. Kapiolani Trust Boundaries

On June 1998, the Circuit Court approved the Amended Stipulation and Order Transferring Land to the Kapiolani Park Trust and Implementation Table ("Order") which authorized the exchange of City and County of Honolulu and State of Hawaii lands in "substitution of [Waikiki Fire Station, Kapahulu Avenue, and portions of Jefferson Elementary School]" lands used for purposes inconsistent with the Kapiolani Park Trust. The Order further directed the City and State to "undertake all actions necessary including the compliance with all regulations and subdivision ordinances to implement the exchange of [these] lands ..." Thus, these properties are no longer included within the boundaries of the Kapiolani Park Trust.

2. Honolulu Zoo Entrance

The planned new Honolulu Zoo Entry is located on Kapiolani Park Trust lands as is the entire Zoo. The City has worked with community interest groups and individuals, and most of them recognize the need for a new entrance and the challenges faced by the City. Minor adjustments have been made to the Park master plan for the Zoo entrance and are shown in Figure 4 of the Final Environmental Assessment (FEA).

While visitors may not have a difficult time locating the Zoo as a prominent visitor destination in Waikiki, the problem is finding the entrance to the Zoo, which is not readily visible.

The Master Plan for the Honolulu Zoo (Jones & Jones, 1984) recommended replacing the entrance to the Zoo. The need for a new entrance was again proposed in a master plan update for the Zoo (Brong, 1993) and disclosed in the environmental assessment prepared for the Honolulu Zoo Master Plan (Belt Collins, 2000). The major deviation

Bert Narita  
April 10, 2008  
Page 2

from the Zoo master plan and subsequent updated plans is that the existing entrance building will be left in place. All previous plans recommended removing the entrance building.

The design of the new Zoo entrance is intended to integrate the style and character of the existing structures with a new architectural treatment that is compatible and in scale within the overall Park setting. There are no Hawaiian-Victorian architectural or landscaping themes at the Honolulu Zoo.

3. Paki Avenue Renovation

Renovating Paki Avenue is one of several master plan proposals for improving recreation facilities and conditions at Kapiolani Park. Issues and concerns regarding public safety, traffic flow, parking and roadway design will be addressed during the planning and design phase of the project. The City and County of Honolulu has not allocated design and construction funds for any of the proposed improvements.

Regarding your comment concerning the proposed diagonal parking along Paki Avenue, there are many diagonal parking stalls presently along Kalakaua Avenue that require traffic to slow or come to a stop as vehicles back out. Although an exceptional condition for public parking on this island, it is legal, and experience has not shown it to be a problem. Vehicular traffic is thus compelled to maintain a slow rate of speed while traversing this street.

Your suggestion of converting the Kapiolani Park Nursery site into a public parking lot may be considered in future Park master plan updates.

4. Construction of Trellises

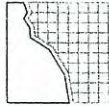
Thank you for your commentary. Long-term maintenance is always a consideration during the planning and design of improvements.

The use of recycled rubber products for the walkway surfaces can be investigated when the walkway improvements are being designed, however, this material may require more maintenance compared to other, more durable surfaces such as asphalt or concrete.

5. Drainage Requirements

A Drainage Plan is not needed at this time. There is sufficient lawn area for rainfall to collect and percolate into the ground. During heavy rains, runoff is known to collect at low-lying areas in the park where it evaporates or percolates into the ground.

Your comment that the drainage ditch between the Waikiki Shell and the corner parking lot (presumably the lot at the corner of Monsarrat and Paki Avenues) is polluted will be passed on the Department of Enterprise Services for follow up.





Bert Narita  
April 10, 2008  
Page 3

6. Rail Transit Terminus

The selection of a rail transit terminus in Waikiki is outside the scope of the Master Plan Update. The location, evaluation, and selection of rail transit stations are within the scope of work of the Honolulu High Capacity Transit Corridor Project. To our knowledge, a transit station location has not been identified for Waikiki.

The participation of the Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board in the environmental assessment review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC



August 22, 2007



Mr. Gerald Park  
Gerald Park Urban Planner  
1221 Kapiolani Boulevard - Suite 211  
Honolulu, HI 96814

Dear Mr. Park:

**Re: Draft EA - Kapiolani Regional Park  
Master Plan Update  
Waikiki, District of Honolulu, Oahu**

Thank you for the opportunity to comment on the above-referenced project. Hawaiian Electric Company, Inc. (HECO) has no objections at this time. The following comments were received from our Engineering Department:

- (1) HECO has existing overhead and underground facilities within the area of the proposed project and will require continued access for maintenance purposes. We appreciate your efforts to keep us apprised of the planning process. As the project progresses, please continue to keep us informed. We will be better able to evaluate any effects on our system facilities further along in the project's development. We request that development plans show all affected HECO facilities and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.
- (2) After reviewing the draft EA, it appears that much of HECO's overhead facilities around Kapiolani Park are proposed for relocation underground. Should it become necessary to relocate HECO's facilities, please submit a request in writing and we will work with you so that construction of the project may proceed as smoothly as possible. Please note that there may be costs associated with any relocation work, and that such costs may be borne by the requestor. Because any redesign or relocation of HECO's facilities may cause lengthy delays, upon determination that HECO facilities will need to be relocated, HECO should be notified immediately in order to minimize any delays in or impacts on the project schedule.

To coordinate HECO's continuing input, I suggest dealing directly with Paul Nakagawa (543-7062), Principal Engineer, Transmission & Distribution Division, Engineering Department.

Sincerely,

Kirk S. Tomita  
Senior Environmental Scientist

cc: T. Ikehara / R. Tamayo



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April 10, 2008

Kirk S. Tomita  
Senior Environmental Scientist  
Hawaiian Electric Company, Inc.  
PO Box 2750  
Honolulu, Hawaii 96840-0001

Dear Mr. Tomita:

Subject: Kapiolani Regional Park Master Plan Update  
Waikiki, District of Honolulu, Oahu, Hawaii

Thank you for reviewing the Draft Environmental Assessment prepared for the subject master plan. We offer the following responses to your comments in the order they were presented.

- (1) The Kapiolani Regional Park Master Plan Update proposes several improvements to the Park. None of the improvements have been funded. We will continue to keep Hawaiian Electric informed about the various improvements. Development plans will be submitted to Hawaiian Electric for review as they are prepared.
- (2) One of the proposed improvements is to underground overhead utilities around Kapiolani Park. Hawaiian Electric Company will be consulted early on to facilitate the design process and prevent unnecessary disruptions in service.

The participation of Hawaiian Electric Company in the environmental review process is appreciated.

Sincerely,

GERALD PARK URBAN PLANNER

Gerald Park

c: T. Hildebrand, DDC