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EXECUTIVE CHAMBERS  
HONOLULU

LINDA LINGLE  
GOVERNOR

November 3, 2010

Anthony J.H. Ching, Executive Director  
Hawai'i Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawai'i 96813

Dear Mr. Ching:

With this letter, I hereby accept the Final Supplemental Environmental Impact Statement for the Revisions to the Kaka'ako Community Development District, Mauka Area Plan ("Draft Mauka Plan"), as satisfactory fulfillment of the requirements of Chapter 343, Hawai'i Revised Statutes. The economic, social, and environmental impacts which will likely occur should this project be built, are adequately described in the statement. The analysis, together with the comments made by reviewers, provides useful information to policy makers and the public.

My acceptance of the statement is an affirmation of the adequacy of that statement under the applicable laws. I find that the mitigation measures proposed in the environmental impact statement will minimize the negative impacts of the project.

In implementing this project, I direct the Hawai'i Community Development Authority and/or its agent to perform these or comparable mitigation measures at the discretion of the permitting agencies.

Sincerely,



LINDA LINGLE

c: Office of Environmental Quality Control



Kakaako Community Development District

## Final Supplemental Environmental Impact Statement - Volume I

*Also Contains Appendix A: Comments Received*

### Draft Mauka Area Plan

*Prepared for:*

Hawaii Community Development Authority

*Prepared by:*

EDAW, Inc.

May 2009





Kakaako Community Development District

***Final Supplemental Environmental Impact Statement***

**Draft Mauka Area Plan**



*Prepared for:*

Hawaii Community Development Authority

*Prepared by:*

EDAW | AECOM

This Final Supplemental Environmental Impact Statement and all ancillary documents were prepared under the signatory's direction or supervision, and the information submitted, to the best of the signatory's knowledge, fully addresses document content requirements as set forth in Chapter 343, Hawaii Revised Statutes, and sections 11-200-17 and 11-200-18 of the Hawaii Administrative Rules.

  
\_\_\_\_\_  
**Anthony J. H. Ching**  
Executive Director  
Hawaii Community Development Authority

*April 28, 2009*  
\_\_\_\_\_  
Date

Accepting Authority: Governor, State of Hawaii

May 2009

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## EXECUTIVE SUMMARY

### Purpose, Need, and Proposed Action

The Hawaii Community Development Authority (HCDA) proposes to revise its existing Mauka Area Plan, which was originally adopted in 1982. The existing Mauka Area Plan sets forth the planning principles and development objectives for the orderly redevelopment of Kakaako's Mauka Area. An Environmental Impact Statement (EIS) for the existing Mauka Area Plan was prepared in 1983. A This Draft Supplemental Environmental Impact Statement (DSEIS) is ~~was~~ being prepared in accordance with Chapter 343, Hawaii Revised Statutes (HRS), as the HCDA has determined that a SEIS ~~was needed should be prepared~~ for the proposed revisions to the Mauka Area Plan. The Draft SEIS was published in the Office of Environmental Quality Control (OEQC) Environmental Notice from July 8, 2008 through August 22, 2008 for a 45 day commenting period. The Final SEIS document contains a discussion of issues raised through comments received during this period. Throughout the Final SEIS document, changes were made to reflect comments received on the Draft SEIS. New text is denoted with an underline and text that is no longer valid is denoted with a strikethrough. In response to comments received on the proposed design elements in the Draft Mauka Area Plan, a third alternative analysis assessing varied building height, density, building envelope, and tower setback was evaluated through an Urban Design Analysis (UDA) of the Final SEIS (Appendix B). Utilities infrastructure of the Mauka Area was also updated and the master plan is included as Appendix E of the Final SEIS. Pursuant to Act 50, a Cultural Impact Assessment was also completed as Appendix D.

The Draft Mauka Area Plan embodies HCDA's goal of creating a pedestrian-oriented, multi-modal community in the 450-acre Kakaako Mauka Area. The update to the Kakaako Community Development District Plan [KCDD (existing Mauka Area Plan)] aims to improve, enhance, and promote an environment where residents and visitors are able *live, work, and play* in the context of urban Honolulu. This ~~Final~~ DSEIS provides a description of the proposed project and the natural and built environments in the Mauka Area. In conjunction with a detailed assessment of how the Draft Mauka Area Plan may impact the existing environmental conditions, the ~~Final~~ DSEIS recommends mitigation measures to minimize such impacts.

The Draft Mauka Area Plan conceptualizes a high-density urban center where mixed-use continues to be the primary land use in order to maximize the potential of each lot while preserving existing uses (such as Central Kakaako). To integrate structures and their uses with adjoining streetscapes and maintain a pedestrian-oriented setting, large developments on superblocks, and associated street closures are discouraged. Instead, provisions in the Draft Mauka Area Plan propose compatible uses in close proximity to one another on pedestrian-friendly streets. Inviting architectural features on grade level streets, improved landscapes, and infrastructure upgrades are proposed to encourage patrons to different uses present with the option of alternate means of travel to automobiles. Several streets are designated to be gentrified as "promenade" streets featuring service, retail, entertainment, and open space. These provisions

facilitate maintaining and enhancing the viability of the existing, as well as attracting prospective businesses to the Mauka Area.

Preservation of the existing Mauka-Makai views is proposed by reducing the maximum allowable building footprint size and orientating the shorter façade of tower element in the Ewa-Diamond Head direction. Height restriction for structures along Ala Moana Boulevard, which bisects Kakaako's Mauka and Makai Areas, is proposed to complement this effort.

The Draft Mauka Area Plan proposes a hierarchy of the existing circulation system organized according to each street's function and the character of uses and building design along the street. The overarching goal is a multi-modal transportation network that allows for safe and efficient travel by creating inviting pedestrian environments while encouraging the use of alternative modes of travel such as transit and bicycling, as well as the movement of goods and services. To this end, several street extensions, realignment, and redesign are proposed to improve connectivity and circulation. To accommodate multi-modal use, installation of medians, bicycle lanes, and directional traffic modifications from one-way to two-way are proposed. "Green" streets, which serve as important links to Mauka Area parks and those in the adjoining Makai Area, would feature improved landscaping to beautify and increase accessibility to the recreational sites for pedestrians. Use of increased linkages that connect the Mauka and Makai areas is likely to facilitate the integration of the Mauka Area with neighboring areas by attracting users.

Under the Draft Mauka Area Plan, new residential projects in the Mauka Area on lots measuring at least 20,000 square feet or more will be required to produce "Reserved Housing" units. Only under rare circumstances when there is a compelling reason why reserved housing units cannot be included or developed off-site, or to resolve a case of fractional units, would HCDA consider the option of an "in-lieu" fee. The stock of units collected in this manner will be reserved for sale or rent to the workforce and/or gap group, described as being from 100 percent to 140 percent of Area Median Income (AMI) range. Implementation of the Reserved Housing program along with the ongoing efforts by the State of Hawaii Housing Finance & Development Corporation (HHFDC), which works to address affordable housing the Kakaako District, will enable a wide range of the population to live in the Mauka Area.

The Mauka Area Infrastructure Plan associated with the SEIS proposes to establish an infrastructure system that adequately supports future redevelopment, development growth, and diversification and densification of land use and population. HCDA will implement segmental redevelopment projects through their Improvement District (ID) Program, which has been largely funded by the Legislature, with contributions from property owners and public utility companies. The ID Program focuses on reconstructing and/or widening streets; installing streetlights, curbs, gutters and sidewalks; improving drainage, sewer and water systems; and, upgrading and undergrounding electrical power and telecommunication.

Although the Draft Mauka Area Plan would serve as a master plan pertaining to redevelopment in the Mauka Area, proposed projects must be submitted to HCDA and processed on a project-by-project basis through a public process. The Draft Mauka Area Plan strongly encourages all development project applicants to consult applicable City & County and State agencies,

including the Department of Land and Natural Resources (DLNR) to ensure correct actions are taken to protect and preserve the archaeological and cultural integrity of the Mauka Area, as well as to prevent unnecessary loss of investment for project applicants. To remedy displacement of persons and/or businesses resulting from public project approvals, the Draft Mauka Area Plan offers financial benefits and relocation services. Displacees from private projects will be offered public assistance short of monetary payments.

## **Beneficial and Adverse Impacts**

Through its implementation of the Draft Mauka Area Plan, HCDA proposes a “self-mitigating” plan that aims at curtailing the magnitude of impacts induced by maximum utilization of development provisions contained in the existing Mauka Area Plan. Regardless, implementation of the Draft Mauka Area Plan would still result in causing potential short and long-term impacts to the natural and built environment. Short and long term impacts consist of short-term construction activities related to infrastructure upgrade and redevelopment projects, and the long term benefits after the completion of each activity, respectively. These potential impacts are summarized below.

### **Construction**

Construction activities may result in short-term impacts consisting of noise from equipment operation, slow moving vehicles on roads to project sites, possible coning of roads to divert traffic, and degradation of air quality. More permanently, alteration of land for grading, site work, infrastructure, and building would result. Many short-term impacts can be avoided or mitigated through the implementation of construction-related best management practices (BMP). The trade-offs among these short-term impacts are the increase in employment and immediate economic benefits of construction-related activities.

### **Infrastructure**

New or upgraded infrastructure may result in short-term impacts similar to that of construction. Possible short-term impacts may include road closures, noise from construction activity, diversion of traffic, slow moving vehicle on roads, and inhibited access to existing business in close proximity to construction sites. These short-term impacts may be decreased by complying with construction-related BMPs. Once completed, the underlying infrastructure and building construction required to conform to the Draft Mauka Area Plan would result in upgraded infrastructure facilities that support high density mixed-use developments where allowable.

### **Population**

According to data available through the City and County of Honolulu, Department of Planning and Permitting (DPP), the Mauka Area population may increase from 6,180 residents (2000 Census) to 30,253 residents by 2030. Correspondingly, housing units are expected to increase from 4,253 (2000) to 20,667 housing units by year 2030. While this represents a substantial increase in the population and number of housing units in the Mauka Area, it assumed that all measures included in the Draft Mauka Area Plan would be implemented and that this growth

would occur over the next two decades, therefore, the resulting population increase and number of housing units would be expected to have less than significant impacts on population and housing.

## Employment

Implementation of the Draft Mauka Area Plan would add approximately 9,734 jobs to the employment pool over the next two decades, likely in the service and retail sectors. While the overall growth in employment would be seen as a positive impact to the area, negative impacts may also result from the absence of growth in other sectors (such as light industrial). Because these jobs are likely to shift to other parts of the island rather than disappear altogether, these negative impacts are anticipated to be less than significant.

## Visual Resources

It is anticipated that the build-out of the Mauka Area would impair the existing Mauka-Makai views. However, the degree of view impairment would be significantly reduced by implementing measures proposed in the Draft Mauka Area Plan. Measures include: reducing building footprint, restricting building heights along Ala Moana Boulevard, narrow towers, and Ewa-Diamond Head orientation of shorter tower façade. By contrast, the existing Mauka Area Plan currently encourages superblock developments wherein, developments on large lots may be developed up to 400 feet in height, occupying a building footprint of as much as 16,000 square feet.

## Traffic

Due to the close proximity from the central business district and the urban Honolulu, Mauka Area residents may consider alternative form of travel, such as TheBus, which contains well-circulated routes in the Mauka Area. The City and County of Honolulu, Department of Transportation (DTS) is also proposing the placement of two light rail stops in the Mauka Area, which is a viable transportation alternative to traveling short distances within or to the adjoining areas of the Kakaako District. The addition of bicycle lanes and “pedestrian realms”, or the sidewalk area, that invites pedestrian travel, are also proposed in the Draft Mauka Area Plan as alternate forms of vehicle travel. The increase in the Mauka Area population, the uses present in the district, and the number of users comprised of residents and visitors alike, may exacerbate the traffic condition. Slower travel time due to traffic congestion is a likely impact. Mitigation measures are necessary to alleviate probable traffic congestion.

## Open Space and Parks

Because the Mauka Area is a nearly built-out urban area facing certain redevelopment into even more intensive land use pattern of high density residential, commercial, and industrial uses, HCDA is likely unable to acquire additional land to meet the demand for additional park space. As such, the Draft Mauka Area Plan proposes to revitalize the inventory of existing open space and parks in the Mauka Area by improving and enhancing a network streets serving as vital links to these resources. Additional measures include: requiring new residential developments to provide on-site recreational sources for residents; optimizing the use of vacant public land, such

as the former Pohukaina School site; and, proposing a joint use with existing recreational facilities. Implementation of these measures is likely to alleviate the issue of providing and increasing the use of recreational resources by the Mauka Area residents and visitors alike.

## Secondary and Cumulative Impacts

With regard to long-term productivity, the Mauka Area has been successful at sustaining commercial, industrial, and residential uses, and is likely to continue to accommodate mixed-uses in high density form. Implementation of the Draft Mauka Area Plan would raise the quality of living by developing a pedestrian-oriented district, where people can access different uses by foot or by public transportation including the proposed mass transit system, which is proposed to have two stops in the Mauka Area. Streets linking the Mauka Area to adjoining recreational and public spaces are proposed to be improved to encourage a form of outdoor recreation and exercise that promotes a healthy lifestyle.

Development guidelines have been modified to scale structures down and set buildings back in order to create “human-scale” developments, thereby, guiding development to ensure compatibility with an active, pedestrian-friendly outdoor setting. HCDA’s goal of creating a place where people can live, work, and play, would positively effect the quality of life for both residents and visitors in the Mauka Area. Additionally, by absorbing up to four times of the current population by 2030, redevelopment efforts in the Mauka Area would contribute towards relieving suburban sprawl on Oahu.

The redevelopment, in-fill, and the gradual build-out of the Mauka Area is likely to affect its residents, visitors, and nearby areas, such as downtown Honolulu, Ala Moana, and Waikiki, as well as other parts of the City. Implementation of the Draft Mauka Area Plan, when added to other adopted and proposed projects of a similar nature, may have a significant affect on a regional scale, and at the island-wide scale. The Mauka Area is situated within the Primary Urban Center (PUC), which has been designated to accommodate a substantial portion of Oahu’s population growth over the next 25 to 30 years. Implementation of the Draft Mauka Area Plan will provide employment, residential, commercial, industrial opportunities and is likely to jump start redevelopment efforts in the area, notably by General Growth Properties (GGP), Kamehameha Schools (KS), and the City and County of Honolulu.

## Proposed Mitigation Measures

### Transportation and Traffic

The following mitigation measures are proposed to reduce congestion during peak hours induced by population and user growth by year 2030:

- The signalized intersection of Kapiolani Boulevard / Pensacola Street: Retain the existing one-way couplet between Pensacola Street and Piikoi Street;
- The signalized intersection of Kapiolani Boulevard / Piikoi Street: Retain the existing one-way couplet between Pensacola Street and Piikoi Street;

- The signalized intersection of Ward Avenue / Halekauwila Street: No feasible mitigation measure available. Insufficient right-of-way to accommodate modifications to roadway and intersection geometry to mitigate this impact;
- The signalized intersection of Ward Avenue / Queen Street: No feasible mitigation measure available. Insufficient right-of-way to accommodate modifications to roadway and intersection geometry to mitigate this impact;
- The all-way stop intersection of Halekauwila Street / Cooke Street: Signalize the intersection; and,
- The all-way stop intersection of Pohukaina Street / Cooke Street: Signalize the intersection.

Each owner, developer, and / or successor-in-interest of any proposed project in the Mauka Area shall be responsible for their proportionate share of the proposed mitigation measures. The implementation of the proposed mitigation measures would lower the level of adverse impacts to less than significant. The exceptions are Ward Avenue / Halekauwila Street and Ward Avenue / Queen Street intersections, which, in spite of mitigation measures, the level of adverse impacts will continue to remain significant and unavoidable.

## Alternatives Considered

The alternative to the proposed Draft Mauka Area Plan is continuation of the existing Mauka Area Plan (No-Action Alternative). The No-Action Alternative permits the construction of a network of towers, pedestrian and park spaces atop connected building podiums 45 feet above the ground. Superblock developments with tower footprints of 16,000 square feet and 400 foot height would continue to be allowed with no required studies demonstrating the mass orientation, scale in comparison to adjoining uses, or view impacts at the street level or from distant locations. Roads would continue to be orientated for automobile use rather than designed with pedestrians and bicyclists in mind. The existing street, pedestrian, and building form would continue to evolve with no reference to their symbiotic relationship in creating a sustainable, pedestrian-oriented urban village.

## Unresolved Issues

### Nonrenewable Resources

Implementation of the Draft Mauka Area Plan would result in the irreversible and irretrievable commitment of certain natural and fiscal resources. Major nonrenewable resource commitments include the project site and the financing, construction material, labor, and energy required for projects to be completed. Resources such as fossil fuel and construction material would be irrevocably committed. Labor would be required for planning, engineering, and construction. New residential, commercial, or industrial uses would generate increases in the demand for water, electricity, and sewer services. Providing potable water for consumption would commit additional groundwater resources, even though at present, there is an adequate supply of water to sustain the projected population. The projected build out is intended to meet existing and

projected population growth originating from Oahu and not new demand from outside. These consumers would generate demand for new water resources regardless of their location. When fully built out in accordance with the Draft Mauka Area Plan, the area would likely transform to a higher density, mixed-use urban environment. The construction of high rise buildings that contain mixed-use or single use developments within the Mauka Area would irreversibly erode Mauka-Makai views.

## Compatibility with Land Use Plans and Policies

Pursuant to Act 153, Session Laws of Hawaii (SLH) 1976, authority was granted by the State Legislature to the HCDA to supersede County ordinances. HCDA has the overriding authority to certain local controls, such as the PUC Development Plan and Zoning. Nevertheless, the Draft Mauka Area Plan does not require an amendment to either the City & County of Honolulu General Plan or the PUC Development Plan. The Draft Mauka Area Plan, however, would continue to conform to most applicable goals, objectives, policies, and priority guidelines of the Hawaii State Plan, State Functional Plans, State Coastal Zone Management Plan, and embodies and fosters the goals set forth in the County General Plan.

## Listing of Permits or Approvals

Table ES-1 provides a preliminary list of the major permits and approvals required for the project.

**Table ES-1 Required Approvals and Permits**

<b>Permits or Approval</b>	<b>Authority</b>
Subdivision Approval (if applicable)	Department of Planning and Permitting
Building / Grading Permits	Department of Planning and Permitting
Installation of Power Lines and Substations	State Public Utilities Commission
National Pollutant Discharge Elimination System (NPDES)	State Department of Health
Noise Permit	State Department of Health
Modification of Highway Access Rights	Department of Transportation, Highways
Work Within the State Highway ROW	Department of Transportation, Highways
Dewatering	Department of Health, Clean Water Branch
Trenching	Department of Health
Development Permit	Hawaii Community Development Authority

Source: EDAW, 2008

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## Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
ACOE	Army Corps of Engineers
ADA	Americans with Disabilities Act
AMI	Area Mean Income
AMSPS	Ala Moana Sewage Pump Station
AVO	average vehicle occupancy
AWSC	all-way stop-controlled
BMP	best management practice
BWS	Board of Water Supply
CBD	central business district
CCTV	closed-circuit television
CDA	Civil Defense Agency
CFR	Code of Federal Regulations
cfs	cubic feet per second
CSH	Cultural Surveys Hawaii
CWA	Clean Water Act
CWRM	Commission on Water Resource Management
CZM	Coastal Zone Management
CZMA	Coastal Zone Management Act
CZMP	Coastal Zone Management Plan
dB	decibel
dBA	A-weighted decibel
DBEDT	Department of Business, Economic Development & Tourism
DLNR	Department of Land and Natural Resources
DOE	Department of Education
DOH	Department of Health
DOT	Department of Transportation
DPP	Department of Planning and Permitting
DPW	Department of Public Works
DSEIS	draft Supplemental Environmental Impact Statement
DTS	Department of Transportation Services
EA	Environmental Assessment
EIS	Environmental Impact Statement
EmA	Ewa silt clay
ENV	Environmental Services, City and County of Honolulu
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FAR	floor-area-ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FL	fill
GASCO	Gas Company, The
GGP	General Growth Properties
HAR	Hawaii Administrative Rules
HART	Honolulu Area Rapid Transit
HBW	home-based work
HCDA	Hawaii Community Development Authority
HCM	highway capacity manual
HECO	Hawaiian Electric Company

HHFDC	Hawaii Housing Finance and Development Corporation
HOV	high occupancy vehicle
HRHP	Hawaii Register of Historic Places
HRS	Hawaii Revised Statute
HTCO	Hawaiian Telecom
HUD	Housing and Urban Development, US Department of
IBC	Island Burial Council
ID	Improvement District
ITE	Institute of Transportation Engineers
ITS	intelligent transportation system
JTW	journey to work
KS	Kamehameha Schools
KSDD	Kakaako Special Design District
LCA	Land Commission Awards
L <sub>dn</sub>	day-night equivalent sound levels
LEED	Leadership in Energy and Excellence in Design
LOS	level of service
LUC	Land Use Commission
LUO	Land Use Ordinance
MGD	million gallons per day
MKA	Makiki clay loam
MOA	memorandum of agreement
MOE	measure of effectiveness
MOS	minimum operable segment
MLP	maximum load point
MSA	metropolitan statistical area
MSL	mean sea level
MUZ	Mixed Use Zone
MUZ-C	Mixed Use Zone Commercial
MUZ-R	Mixed Use Zone Residential
MVA	mega volt amperes
NAAQS	National Ambient Air Quality Standards
NAMS	National Air Monitoring System
NBC	Neal Blaisdell Center
NEPA	National Environmental Protection Act
NHPA	National Historic Preservation Act
NOAA	National Oceanic Atmospheric Administration
NPS	National Park Services
NRHP	National Register of Historic Places
NPDES	National Pollutant Discharge Elimination System
OEQC	Office of Environmental Quality Control
OMPO	Oahu Metropolitan Planning Organization
OP	Office of Planning, State
ORTP	Oahu Regional Transportation Plan
OSHA	Occupational Safety and Health Administration
OTS	Oahu Transit Services
PARK	Park zoning designation
PARKS	Parks and Recreation, City and County of Honolulu Department of
PD	Planned Development
PG	Park on Garage
PUBLIC	Public zoning designation
PUC	Prime Urban Center
PUC-DP	Prime Urban Center Development Plan

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RH	reserved housing
ROH	Revised Ordinance of Honolulu
ROW	right-of-way
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SCAP	Stream Channel Alteration Permit
SEIS	supplemental environmental impact statement
SEISPN	supplemental environmental impact statement preparation notice
SHPD	State Historic Preservation Department
SIWTP	Sand Island Wastewater Treatment Plant
SLAMS	State and Local Air Monitoring Stations
SLH	Session Laws of Hawaii
SMA	Special Management Area
SOV	single-occupancy vehicle
SRTS	safe routes to school
SSV	shoreline setback variance
UDA	Urban Design Analysis
UH	University of Hawaii
USC	United States Code
TAZ	traffic analysis zone
TDM	transportation demand management
TIF	transportation impact fee
TOD	transit-oriented development
TWSC	two-way stop-controlled
cap.	capacity
cap. util.	capacity utilization
cum.	cumulative
mph	miles per hour
pax	passengers
pphpd	passengers per hour per direction
rid.	ridership
WQC	Water Quality Certification
v/c	volume-to-capacity

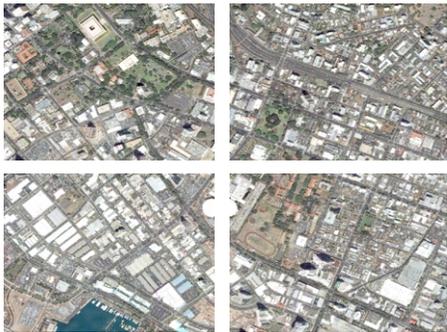
## PROJECT PROFILE

<b>Applicant:</b>	Hawaii Community Development Authority 677 Ala Moana Boulevard, Suite 1001 Honolulu, Hawaii 96813 Contact: Susan Tamura Phone: (808) 587-2870
<b>Agent:</b>	EDAW, Inc. 841 Bishop Street, Suite 1910 Honolulu, Hawaii 96813 Contact: Kevin Butterbaugh Phone: (808) 529-7290
<b>Project Name:</b>	Revisions to the Kakaako Community Development District Mauka Area Plan and Rules (“Draft Mauka Area Plan”)
<b>Determination:</b>	Supplemental Environmental Impact Statement
<b>Project Location:</b>	Kakaako Community Development District Mauka Area (“Mauka Area”). The Mauka Area is situated between downtown Honolulu and Ala Moana. The project area is bounded by Punchbowl, Piikoi and King Streets, and Ala Moana Boulevard.
<b>Tax Map Keys:</b>	2-1-29, 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, and 56; 2-3-01, 02, 03, 04, 05, 06, 07, 08, 09, 10 and 11
<b>Land Area:</b>	Approximately 450 acres
<b>State Land Use District:</b>	Urban
<b>Land Use Zoning:</b>	Mixed-Use Zone Commercial, Mixed-Use Zone Residential, Mixed-Use Zone Residential-A, Public, and Park
<b>Special Management Area:</b>	Project area is not located with the Special Management Area
<b>Flood Zone:</b>	Flood Insurance Rate Maps (FIRM), Zones A and AE (areas of undetermined base flood elevations and base flood elevation of 4-foot mean sea level, respectively).
<b>Required Permits:</b>	Subdivision approval, park dedication, building / grading permits, installation of power lines and substations, NPDES, noise permit, <u>modification of highway access rights, work within the State highway ROW, dewatering, and trenching permits</u>

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# Chapter 1

## Purpose and Need for the Proposed Action





# 1.0 Purpose and Need for the Proposed Action

## 1.1 Purpose and Need for a Supplemental Environmental Impact Statement (SEIS)

The HCDA proposes to revise its existing Mauka Area Plan, which was originally adopted in 1982. The existing Mauka Area Plan sets forth the planning principles and development objectives for the orderly redevelopment of Kakaako's Mauka Area.

In May 2003, the HCDA initiated a comprehensive review of the KCDD Mauka Area Plan and Rules ("the existing Mauka Area Plan"). In 2005, HCDA along with planning consultants, PlanPacific, Inc., embarked on a comprehensive review and revision of the Mauka Area Plan in response to issues relating to the existing Mauka Area Plan's urban design scheme and the livability of Kakaako's neighborhoods. Through an extensive public input process, the Draft Mauka Area Plan was developed.

In accordance with Chapter 343, Hawaii Revised Statutes (HRS), the HCDA has determined that a SEIS should be prepared for the proposed revisions to the Mauka Area Plan. The original EIS for the existing Mauka Area Plan was prepared in 1983. The EIS was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) and Chapter 343, HRS, in anticipation of the applicability to Federal and State actions. It compared three alternatives to the Mauka Area Plan, which was considered the proposed action. The alternatives included: a "no-action alternative" consisting of the City and County of Honolulu land use plans and zoning, and two alternate plans developed by HCDA consultants. The alternate plans showed urban design options for Kakaako. In 1985, a SEIS was prepared to assess the Makai Area Plan, which also included an assessment of infrastructure development in the Mauka Area.

The purpose of this DSEIS is to describe the proposed revisions to the Mauka Area Plan and disclose anticipated environmental, economic, and social impacts relating to the proposed revised components. This DSEIS was prepared in compliance with Chapter 343, HRS, and the accompanying Hawaii Administrative Rules (HAR) for the Department of Health.

## 1.2 Background

With the passage of Chapter 206E, HRS, HCDA was created by the State Legislature in 1976 as a public corporate entity to plan for and revitalize areas in the State which the Legislature found to be in need of timely redevelopment. The State Legislature subsequently designated Kakaako as the first Community Development District under HCDA. Legislators found that Kakaako was significantly underdeveloped and underutilized relative to its central location in urban Honolulu.

Following an intensive five-year planning process, the existing Mauka Area Plan was accepted by the Governor on February 16, 1982. The existing Mauka Area Plan envisioned a fully built out urban area with a focus on large lot development through land consolidation. In 1983, the original district boundary was amended to include the Kakaako waterfront area, creating Mauka and Makai sub-districts (Figure 1-1).

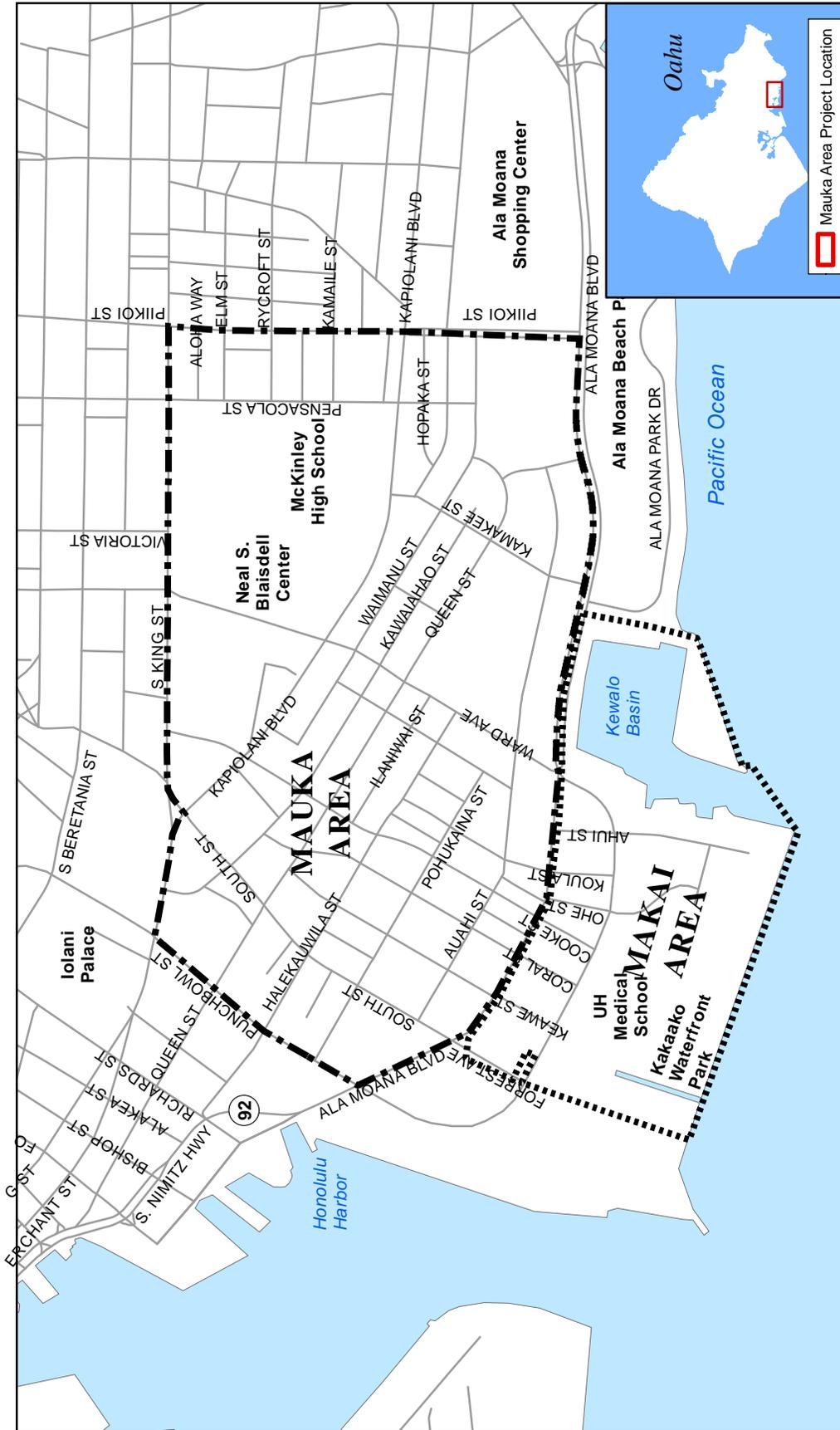


Figure 1-1 Project Location

-  Mauka Area (Study Boundary)
-  Makai Area



EDAW | AECOM

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Sources: City and County of Honolulu, 2007; PlanPacific, 2007; EDAW, 2008

Since inception of the Mauka Plan in 1982, the Mauka Area has gradually changed from a low-rise, low-density industrial/commercial district to an area mixed with low to high density projects with thriving industrial, commercial, and residential uses.

### 1.3 Project Site

Kakaako is situated in the Kona district of Honolulu *ahupuaa* (land division). The project site is bounded by Punchbowl, King, and Piikoi Streets and Ala Moana Boulevard. The Mauka Area is comprised of approximately 450 acres situated between downtown Honolulu and Ala Moana. Notable adjacent features include the Ala Moana Shopping Center, the Ala Moana Beach Park, Kakaako Waterfront Park, Kewalo Basin, and the Civic Center (See Figure 1-2).

### 1.4 Project Schedule

The HCDA is expected to consider adoption of the Draft Mauka Area Plan following the completion of the SEIS process. The Draft Mauka Area Plan is intended to provide guidance for the long-term development of the Mauka Area.

### 1.5 Project Funding

Considerable public expenditure has already occurred in the Mauka Area, principally for infrastructure improvements. Further expenditures, for infrastructure and public facilities development are planned to accommodate the development proposed by the Draft Mauka Area Plan. The DSEIS will include an estimate on public expenditures for the development of the Mauka Area.

### 1.6 Changes Made to the Draft SEIS

Throughout the Final SEIS document, changes were made to reflect comments received on the Draft SEIS. New text is denoted with an underline and text that is no longer valid is denoted with a ~~strikethrough~~.

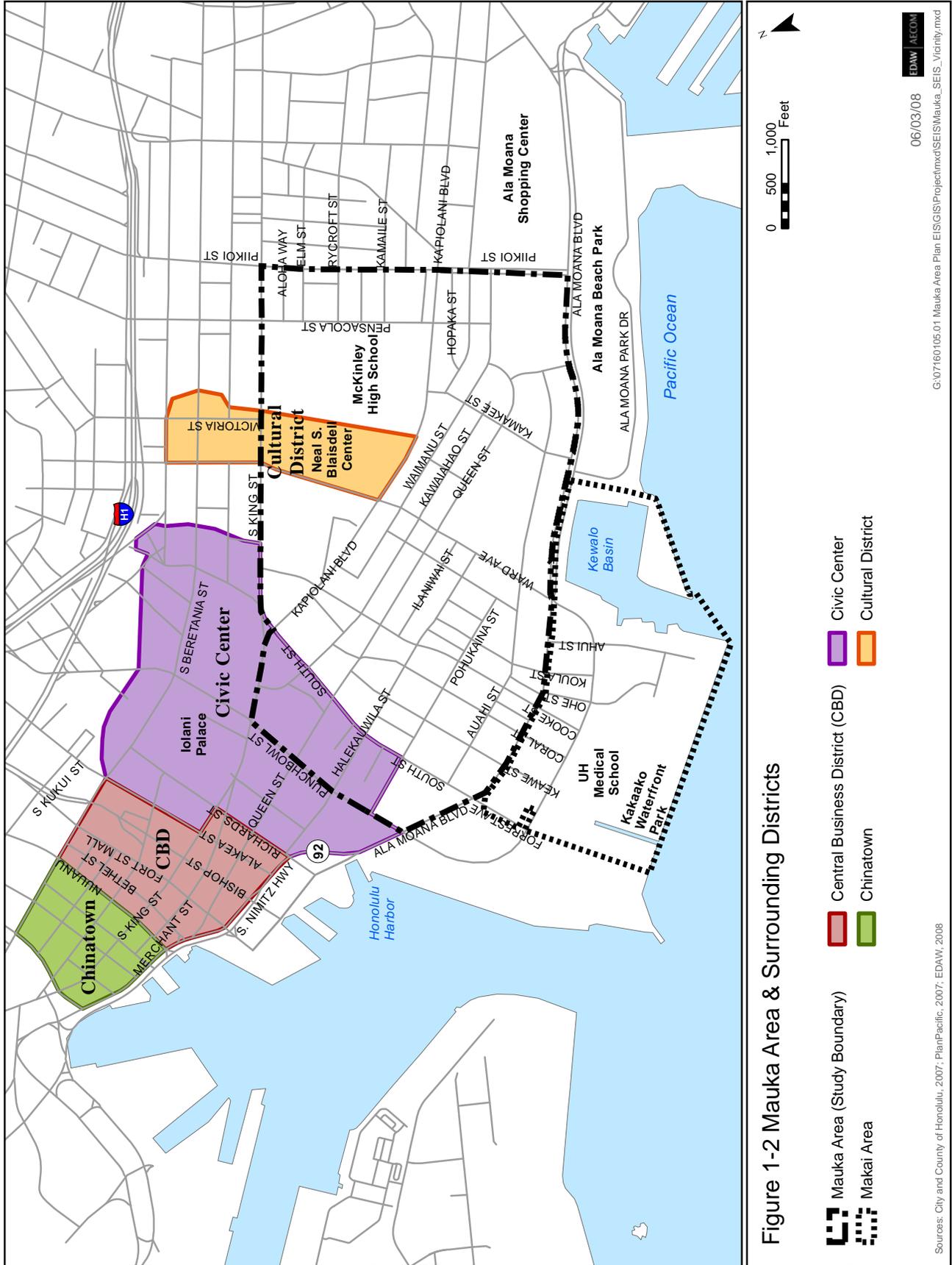


Figure 1-2 Mauka Area & Surrounding Districts

- Mauka Area (Study Boundary)
- Central Business District (CBD)
- Chinatown
- Civic Center
- Cultural District

Sources: City and County of Honolulu, 2007; PlanPacific, 2007; ED&W, 2008  
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# Chapter 2

## Project Description





## 2.0 PROJECT DESCRIPTION

### 2.1 Introduction

The vision for the KCDD is to create a vibrant community where people are able to live, work, and play in close proximity, thus reducing the need to commute. The intent of the Draft Mauka Area Plan is to provide the necessary guidance in planning for a high quality urban community that also promotes positive economic development, preserves Honolulu's diverse cultural heritage, and incorporates best practices in energy and environmental sustainability.

Three key principles are being introduced in the Draft Mauka Area Plan: (1) developing urban village neighborhoods where people can live, work, and play; (2) creating great public places; and (3) making connections by providing convenient access to a wide range of services and activities via walking, bicycling, driving or public transit. Revisions to the various components of the existing Mauka Area Plan are proposed to achieve HCDA's goal of creating a vibrant community in Kakaako. Objectives for the Draft Mauka Area Plan include the following:

- Develop the Draft Mauka Area Plan around key Smart Growth concepts including:
  - Pedestrian-friendly urban form, including structures built at human scale and defined public spaces;
  - Neighborhoods defined by centers, edges, and a mix of uses;
  - Streets designed to accommodate multiple modes of transportation and to balance the need for access, circulation, and mobility;
  - Street patterns that create a network and alternate travel routes throughout the District; and,
  - Civic buildings (meeting halls, community facilities, churches, schools, and museums) are located on prominent sites within neighborhood centers.
- Promote mixed-use and standalone uses;
- Strengthen connection with surrounding neighborhoods and districts;
- Define and establish specific objectives for neighborhoods, corridors, and streets;
- Building on existing assets and planned investments, such as Mother Waldron Neighborhood Park Playground, street and utility improvements and the proposed mass transit stops; and
- Encourage a mix of housing opportunities including reserved housing and affordable units.

These proposed Plan elements are summarized in the following sections.

### 2.2 Land Use

The Draft Mauka Area Plan retains the original concept of a mixed-use district, where uses can be mixed horizontally as well as vertically. Mixed-use developments facilitate pedestrian travel

and reliance on the existing public transportation system. The existing public transportation system includes The Bus and potentially, the county-wide mass transit system, which proposes to have two stops in the Mauka Area. The following land use designations are proposed and illustrated in Figure 2-1:

- *Mixed-Use Zone (MUZ)*. The MUZ allows for the development of commercial, residential, and industrial use projects. It is anticipated that commercial, residential, and industrial uses may co-exist within same developments, but not all projects need to be mixed use.
- *Mixed-Use Zone Residential (MUZ-R)*. Lands zoned MUZ-R is located within the Sheridan Neighborhood. The MUZ-R zone allows for the development of residential and commercial use projects. The purpose of the MUZ-R is to allow a limited mixture of neighborhood commercial activities in an area designated for residential use.
- *Public (PUBLIC)*. Public-zoned lands are publicly owned. The purpose of PUBLIC zone is to allow public facilities to be developed to support community redevelopment. Public uses include projects that are developed by public entities for public purpose.
- *Park (PARK)*. Areas designated PARK is intended for use as public parks.

## 2.3 Neighborhoods

In addition to the formation of a Land Use Plan, variations in existing and emerging land uses, building forms, and land tenure patterns, combined with the influences of major transportation corridors and adjacent districts, suggest the formation of several distinct neighborhoods within Kakaako. The purpose is to create a strong neighborhood identity, because people who live and work in neighborhoods feel a sense of belonging to the community and recognize they have a stake in maintaining it as a desirable place. Figure 2-2 shows the various Mauka Area neighborhoods which are described below:

- *Civic Center* is characterized by government and other important civic buildings in campus-like settings, most of which are located just beyond the Kakaako district boundary;
- The *Thomas Square* neighborhood is focused on the historic park that bears this name;
- *Sheridan* is a predominantly residential neighborhood composed of small, fee simple lots;
- *Kapiolani* is a corridor where land uses are strongly influenced by the significant role of Kapiolani Boulevard as a high-capacity transportation route;

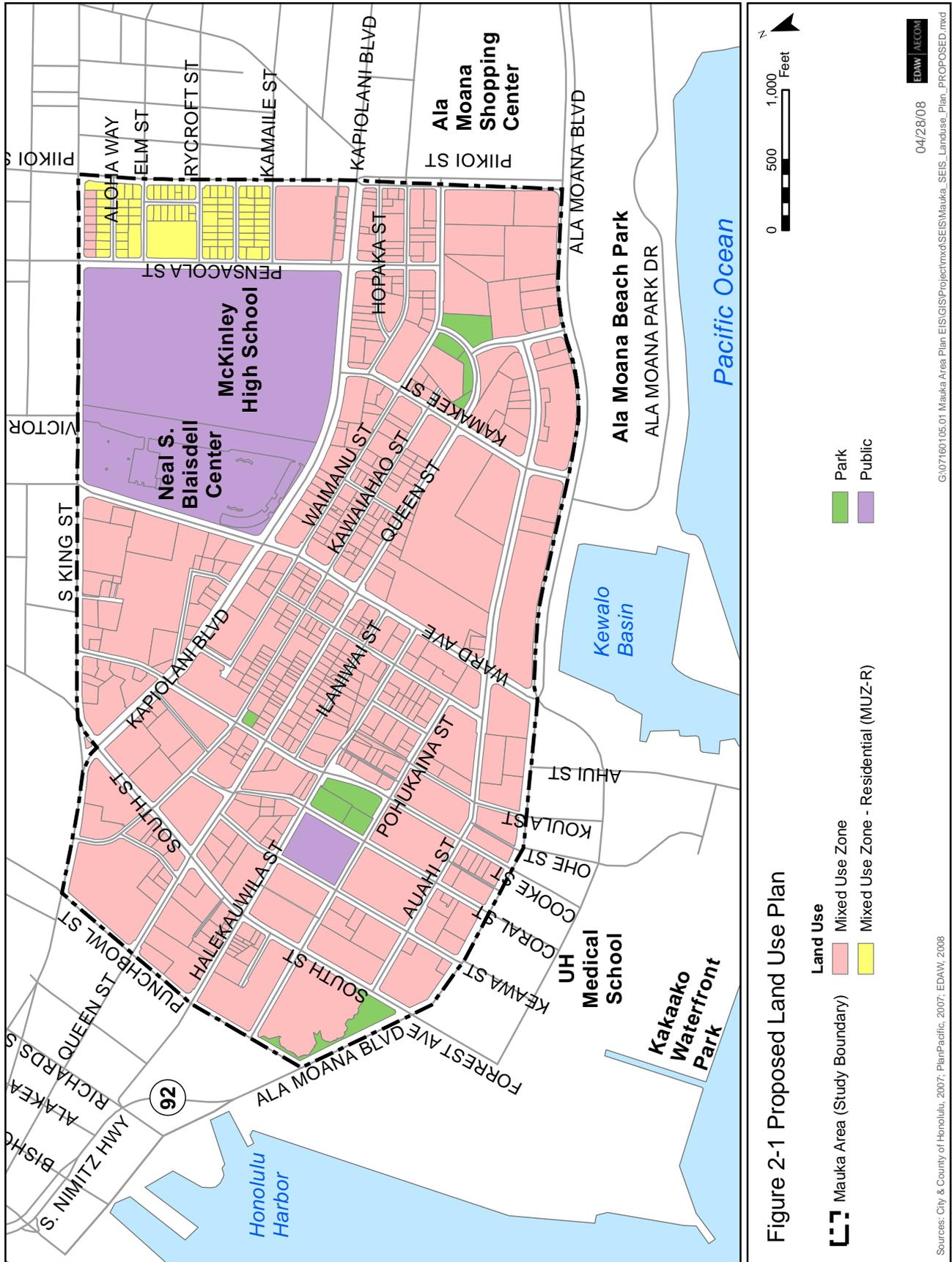


Figure 2-1 Proposed Land Use Plan

- Land Use**
- Mauka Area (Study Boundary)
  - Mixed Use Zone
  - Mixed Use Zone - Residential (MUZ-R)
  - Park
  - Public

Sources: City & County of Honolulu, 2007; PlanPacific, 2007; EDANW, 2008  
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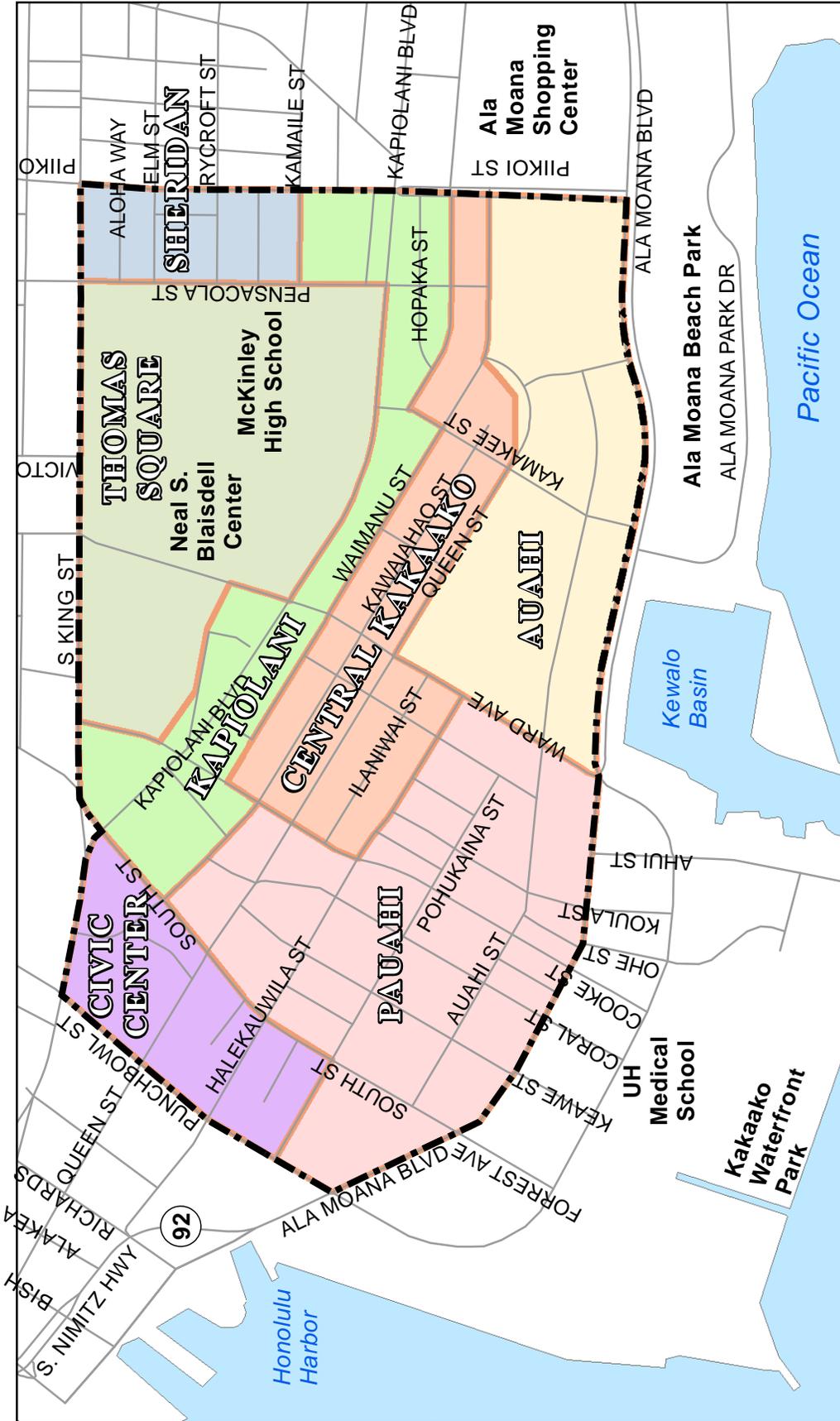


Figure 2-2 Neighborhood Network

- Mauka Area (Study Boundary)
- Neighborhoods**
- Civic Center
- Pauahi
- Central Kakaako
- Auahi
- Kapiolani
- Thomas Square
- Sheridan

SOURCE: PlanPacific, 2007; EDAM, 2008

06/03/08 EDAM / AECOM

- *Central Kakaako* is composed primarily of small lots in individual ownership with an industrial character;
- *Auahi* is a neighborhood whose focal point is emerging as a retail and entertainment center along Auahi Street; and
- *Pauahi* is a potential mixed-use “urban village” neighborhood that has not yet emerged.

## 2.4 Urban Design

The key concept of the Mauka Area Plan is based on Act 153, SLH of 1976, which mandates HCDA to plan and carry out redevelopment projects in underdeveloped areas within the KCDD so that new planned communities can be developed in consonance with the surrounding urban areas.

### 2.4.1 Principles

Following are the principles being proposed as part of the Urban Design element of the Draft Mauka Area Plan:

- *Create an outstanding pedestrian environment:* As an active street life is an essential ingredient for an urban village, all streets should provide safe, pleasant, human-scaled walking conditions so that pedestrians have convenient routes to navigate through the neighborhoods for all kinds of trip purposes, including casual recreation and exercise.
- *Create a network of green streets:* Kakaako’s circulation system will be organized according to a typology and hierarchy described by each street’s function and the character of uses and building design along the street. Certain streets will have particular importance as public spaces, supporting a significant level of pedestrian activity and providing connections between public open spaces and destinations.
- *Provide for maximum road connections:* The Draft Mauka Area Plan seeks to retain most existing streets and create new ones in neighborhoods poised for significant redevelopment. The proposed street system will enable alternative routes for circulation and access to properties. This will reduce the traffic burden on principal streets and provide more convenient routes for all modes of travel. The circulation system will also organize streets according to their intended transportation function.
- *Connect pedestrian paths across major thoroughfare:* Because of their important function as high-volume traffic corridors, Ward Avenue and Ala Moana Boulevard will remain busy thoroughfares. As presently designed, they act as a barrier to pedestrian movement across their rights-of-way. This will become a pronounced impediment to access as neighborhoods develop as urban villages. Both Ward Avenue and Ala Moana Boulevard could become seams rather than hard edges if they were modified to include a center landscaped median to provide a refuge to crossing pedestrians, more attractive, wider sidewalks on either side of the roadway, and more favorable crosswalk design at key intersections to provide connectivity, especially between segments of “green” streets

and between Mauka Area's neighborhoods and recreational destinations. Intersections identified as needing special pedestrian crosswalk treatment are:

- Ala Moana Boulevard – Cooke Street;
  - Ala Moana Boulevard – Piikoi Street;
  - Ala Moana Boulevard – Ward Avenue;
  - Ala Moana Boulevard – Kamakee Street;
  - Ward Avenue – Pohukaina Street; and
  - Ward Avenue – Queen Street
- *Strong Mauka-Makai linkage:* Already identified in the Kakaako Makai Area Plan, the Mauka-Makai Promenade identifies a landscaped pedestrian-way that links the Kakaako Waterfront Park with Mother Waldron Neighborhood Park ~~Playground~~. With the support of adjacent landowners, this urban design element will form a spine, promoting the reintegration of the City and waterfront.
  - *Support the small-lot, mixed-use pattern of Central Kakaako:* Central Kakaako contains a thriving cluster of industrial uses comprised of many small businesses that continue to operate under adverse conditions of inadequate storm drainage, rugged street surfaces, narrow vehicular travel lanes and very limited parking, most of which consists of the informal and dangerous use of streets and front yards. To continue the viability of these businesses over the long term in the Central Kakaako neighborhood, improvements to these conditions will be needed. In order to minimize disruption and possible displacement of existing businesses, the Draft Mauka Area Plan proposes that IDs be initiated only on the petition of a majority of property owners of the affected area. Once an ID program has been completed, the properties will be allowed the same density (3.5 FAR) and maximum base building height (65 feet) as other upgraded neighborhoods.
  - *Support TOD:* TOD is an area that is designed to maximize access to public transportation and often incorporates features to encourage transit ridership. A TOD neighborhood will typically have transit station surrounded by relatively high-density development within a 10-minute walk surrounding the station. Features of TOD include mixed-use development that will use transit at all times of the day, excellent pedestrian facilities, collector support from other modes of transportation (buses and shuttles) and reduced amount of parking for personal vehicles.

In February 2007, the Honolulu City Council approved the mass transit Minimum Operable Segment, the First Project of the fixed guideway transit system. The First Project goes from East Kapolei to Ala Moana Center, with the preferred alignment running through the Mauka Area. Two transit stations are proposed for the Mauka Area. Concentrating residences and businesses around a transit station benefits transit ridership and creates the potential for active urban spaces. A reliable high capacity transit system, along with good pedestrian facilities, a range of housing choices, and retail uses and services will enable Kakaako residents to reduce dependence on the automobile.

The City is currently in the process of developing TOD provisions for the entire transit route. It is anticipated that standards for TOD's will be incorporated into the Mauka Area Plan as an added overlay upon completion of the City's TOD development process.

## 2.4.2 Development Provisions

The proposed maximum building heights were determined on the basis of extensive three-dimension computer modeling of topographic conditions, existing building form, potential building form, and photographic surveys.

### Density

Properties in the project site are allowed to develop to a maximum floor-area-ratio (FAR) of 3.5, with the following exceptions:

- In Sheridan, all lots other than those that front King Street will have a maximum FAR of 2.0 to reflect the residential use pattern and building scale of the neighborhood; and,
- In areas where infrastructure has not been upgraded pursuant to an improvement district and/or where streets do not meet the proposed standards in the Draft Mauka Area Plan, the maximum FAR will remain 1.5. Once the infrastructure is upgraded, the maximum allowable FAR will be increased to 3.5.

To promote active uses at street level and human-scaled building forms, building form guidelines are organized into three elements: the Street-Front Element, the Mid-Height Element, and the Tower Element. Each element is described below.

### Building Height

*Street-Front Element:* To create a consistent street wall that defines the street as a public space and to provide a pedestrian friendly facade, this element is required along all street fronts, sited adjacent to the street along a build-to line. Along blocks planned for “promenade” sidewalks, the Street-Front Element must house active uses, such as offices, residences, and retail. On the ground floor, building entries and windows are required. Parking structures use is allowed above the ground floor on blocks not designated for Promenade treatment.

Maximum Height: 65 feet

Minimum Height: Four stories or 40 feet, whichever is greater.

*Mid-Height Element:* The maximum height for this element is determined by view planes from shoreline parks (Kakaako Waterfront Park and Kewalo Basin Park) looking Mauka towards the Koolau ranges. The intent is to encourage projects that maintain Mauka-Makai view planes.

Maximum Height: Range of heights 80 – 215 feet

Footprint: No restriction, aside from Street-front Element and height setback requirement.

*Tower Element:* For any building element taller than the Mid-Height Element, this element is provided for taller buildings and variation in the skyline while keeping a slender profile as the building increases in height.

Maximum Height: 400 feet.

100-foot section of Ala Moana Boulevard fronting Kewalo Basin.  
200 feet along Ala Moana Boulevard between Punchbowl Street  
and Ward Avenue and Kamakee Street and Queen Lane.

Maximum Footprint: 9,000 square feet

Length-to-Width

Ratio for Tower

Footprint: 3:1

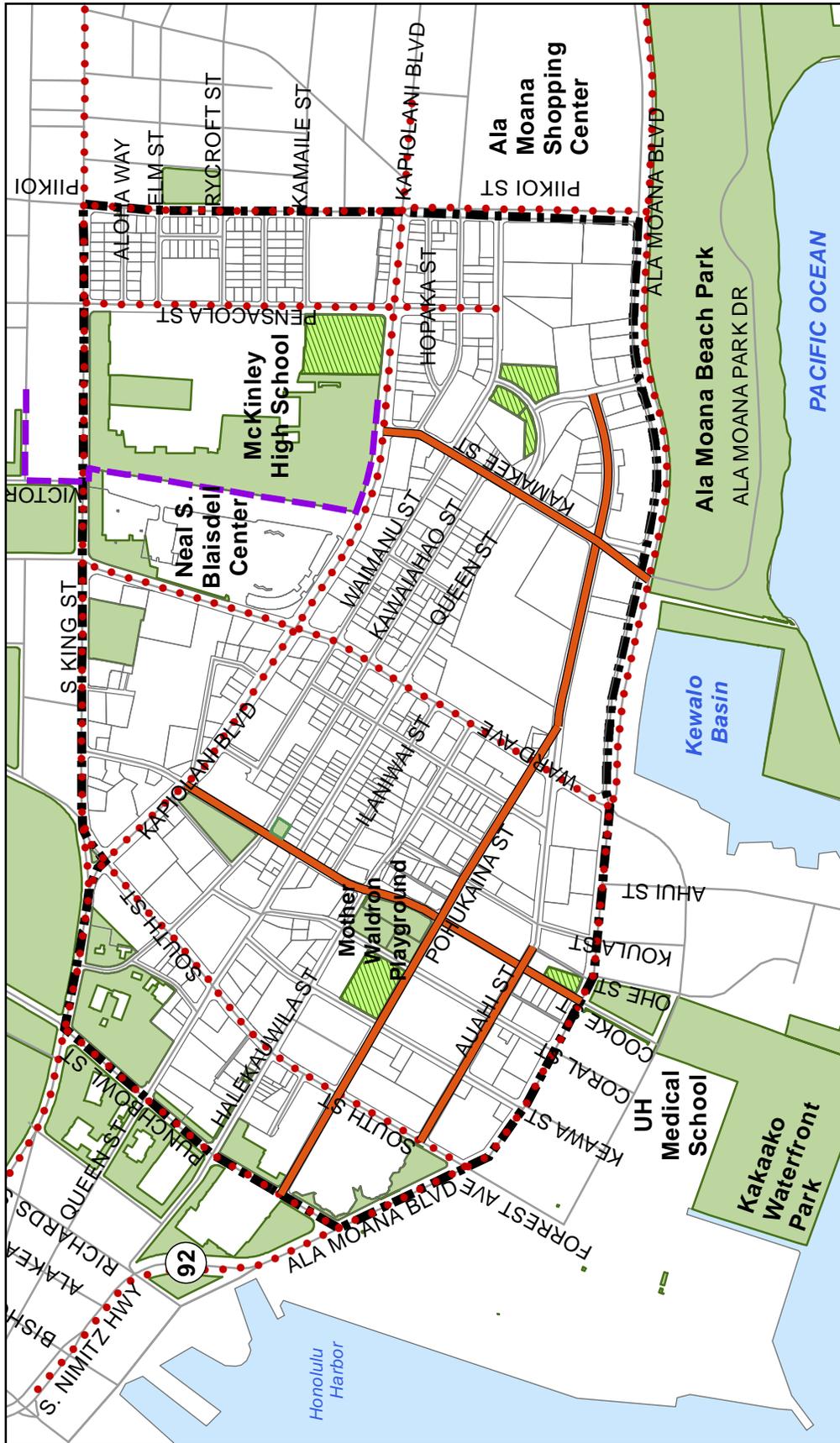
Tower Orientation: Longer side of tower to be orientated Mauka-Makai.

## 2.5 Parks, Open Space, and Views

### 2.5.1 Parks and Open Space: Strategies for Meeting the Project Need

The Mauka Area contains approximately nine acres of existing park space, five acres are public and four acres are private park areas. At present, the area of land committed to public park designation falls short of the City and County of Honolulu's Department of Parks and Recreation planning standards for community based parks (neighborhood, community, and district parks) which requires for two acres of park space to be provided for every 1,000 residents of an area. Community based parks provide active recreational facilities, such as play courts, ball fields, recreation centers, gymnasiums, swimming pools, and play apparatus for the public. Additionally, the City's park system provides approximately 8.1 acres per 1,000 residents for all park facilities, including an extensive network of beach parks and major regional parks (such as Ala Moana Regional Park), botanical gardens, urban parks (such as Thomas Square), bench ROW, pedestrian malls, nature parks and preserves, and the Honolulu Zoo. The following strategies are being proposed towards meeting the goal of optimal utilization of lands already available in Kakaako. Figure 2-3 shows the existing Mauka Area parks, proposed green streets, and public open space in the Kakaako Makai Area:

- *Use of vacant public land for additional recreational opportunities:* a portion of the State-owned former Pohukaina School site has been committed to the development of an affordable housing project, which will include a community room at the ground floor. If the affordable housing does not get built, the site will be used for a new elementary school. The adjacent Mother Waldron Neighborhood Park Playground would provide additional outdoor recreational facilities for children on the school ground itself. If a public school is not built on this site, the site should be used to expand the Mother Waldron Neighborhood Park Playground.
- *Shared use of public recreational facilities:* McKinley High School campus contains the most significant publicly owned outdoor recreational facilities in the Mauka Area. HCDA is proposing to enter into a formal joint school/community use arrangement, in an effort to making a wide range of active outdoor recreational facilities available to the public in the Mauka Area.



**Figure 2-3 Open Space Network**

- Mauka Study Area
- Existing parks and open space
- Proposed bike/pedestrian path
- Streets with promenade sidewalks
- Tree-lined, low speed boulevards and avenues

Scale: 0, 500, 1,000 Feet

06/07/08 EDWW / AECOM

SOURCE: PlanPacific, 2007; EDWW, 2008

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*Promote pedestrian connections to nearby public parks and campuses:* The Draft Mauka Area Plan proposes to improve four “green” streets to enhance their existing links to adjoining parks and open space outside of the Mauka Area. Street conditions, as well as landscaping on these streets will be improved with the ultimate goal of promoting walking and bicycling not just as environmentally friendly and cost effective modes of travel, but also as a form of outdoor recreation and exercise that promotes a healthy lifestyle. The following describes the four “green” streets:

- Cooke Street – borders Mother Waldron Neighborhood Park Playground and provides a connection from the Pauahi neighborhood to the entry to Kakaako Waterfront Park;
  - Pohukaina Street – runs adjacent to Mother Waldron Neighborhood Park Playground and links the Pauahi neighborhood to the Civic Center;
  - Kamakee Street – links the Auahi neighborhood to Ala Moana Beach Park, and to Thomas Square and the Young Street bikeway, by a proposed pedestrian/bicycle recreational path at the boundary between the campuses of McKinley High School and the Neal Blaisdell Center (NBC); and,
  - Piikoi Street – designated for marked bicycle lanes, connects the Diamond Head end of the Mauka Area to Ala Moana Beach Park and Sheridan Community Park.
- Encourage private investment in open space and recreational facilities such as urban plazas and pocket parks: Recognizing that when it comes to public open space in an urban setting, quality and location are more important than quantity and size, HCDA proposes to encourage developers to set aside public open space near widely traveled nodes framed by buildings. These plazas are often activated with food vendors, outdoor dining, programmed entertainment, public art, and water features. Ample seating, careful consideration of shade and wind patterns, and attractive landscaping, paving, furnishing, and other details need to be considered in designing these spaces. The Draft Mauka Area Plan suggests several locations for these new plazas – near the intersections of Cooke Street and Ala Moana Boulevard, Ward Avenue and Auahi Street, and on Cooke Street across from Mother Waldron Neighborhood Park Playground (See Figure 2-3).
  - Quieter pocket parks may be located on a local street, rather than a major node. Design of pocket parks would be similar to plazas, but with greater emphasis on landscaping and omission of activity generating elements. The existing pocket park at the corner of Cooke and Kawaihāo Streets is appropriate in size, but it is not a successful space because it lacks attractive building facades on the two adjoining properties to frame and enliven the park.

Since the availability of land for recreational use in the Mauka Area is limited, there is little opportunity to expand the park inventory. One method to remedy the need to provide public park space is to continue to require developers to provide on-site recreational facilities for projects. Under the existing Mauka Area Rules, developers are required to provide 55 square feet of recreational space per residential unit. This has resulted in approximately 17 acres of private recreation space.

## 2.5.2 Views and View Corridors

Natural features and the development pattern of surrounding districts and neighborhoods create a context for the Kakaako District. In order to fit comfortably within that context, it is important to identify the most significant features and propose guidelines for structures that respect and preserve them.

Currently, there are panoramic Mauka views of the Koolau Range from Kakaako Waterfront Park and Kewalo Basin Park that have been identified in the PUCDP. The vantage points and associated view cones for these panoramic views are indicated in Figure 2-4. The view cones represents an attenuated view that remains across areas of Mauka Area where taller buildings are either absent or placed far enough from the shorelines that their visibility recedes and their perceived height diminishes in relationship to the mountain backdrop.

An Urban Design Analysis (UDA) study associated with the DSEIS was performed to assess and examine the degree of view obstruction caused by the build-out of the Mauka Area under ~~two~~ three scenarios: the existing Mauka Area Plan, ~~and the~~ Draft Mauka Area Plan, and a third scenario as the result of public comments received.

## 2.6 Transportation Plan

The Draft Mauka Area Plan envisions a multi-modal transportation network that allows for the safe and efficient travel of people and goods in all modes. The Draft Mauka Area Plan also emphasizes pedestrian travel by creating inviting pedestrian environments and encourages the use of alternative modes of travel such as transit and bicycling.

### 2.6.1 Roadway Network Changes

Figure 2-5 shows the proposed classifications for urban roadway facilities, based on a system developed by the Institute of Transportation Engineers (ITE, 2006).

- *Low-Speed Boulevard*: Walkable, low speed (35 mph or less) divided arterial thoroughfare in urban environments designed to carry both through and local traffic, pedestrians and bicyclists. Boulevards may be long corridors, typically four lanes but sometimes wider, serve longer trips and provide limited access to land. Boulevards may be high ridership transit corridors. Boulevards are primary goods movement and emergency response routes and use access management techniques. Curb parking may be allowed on boulevards.
- *Avenue*: Walkable, low-to-medium speed (30 to 35 mph) urban arterial or collector thoroughfare, generally shorter in length than boulevards, serving access to abutting land. Avenues serve as primary pedestrian and bicycle routes and may serve local transit routes. Avenues do not exceed four lanes and access to land is a primary function. Goods movement is typically limited to local routes and deliveries. Some avenues feature a raised landscaped median. Avenues may serve commercial or mixed-use sectors and usually provide curb parking.

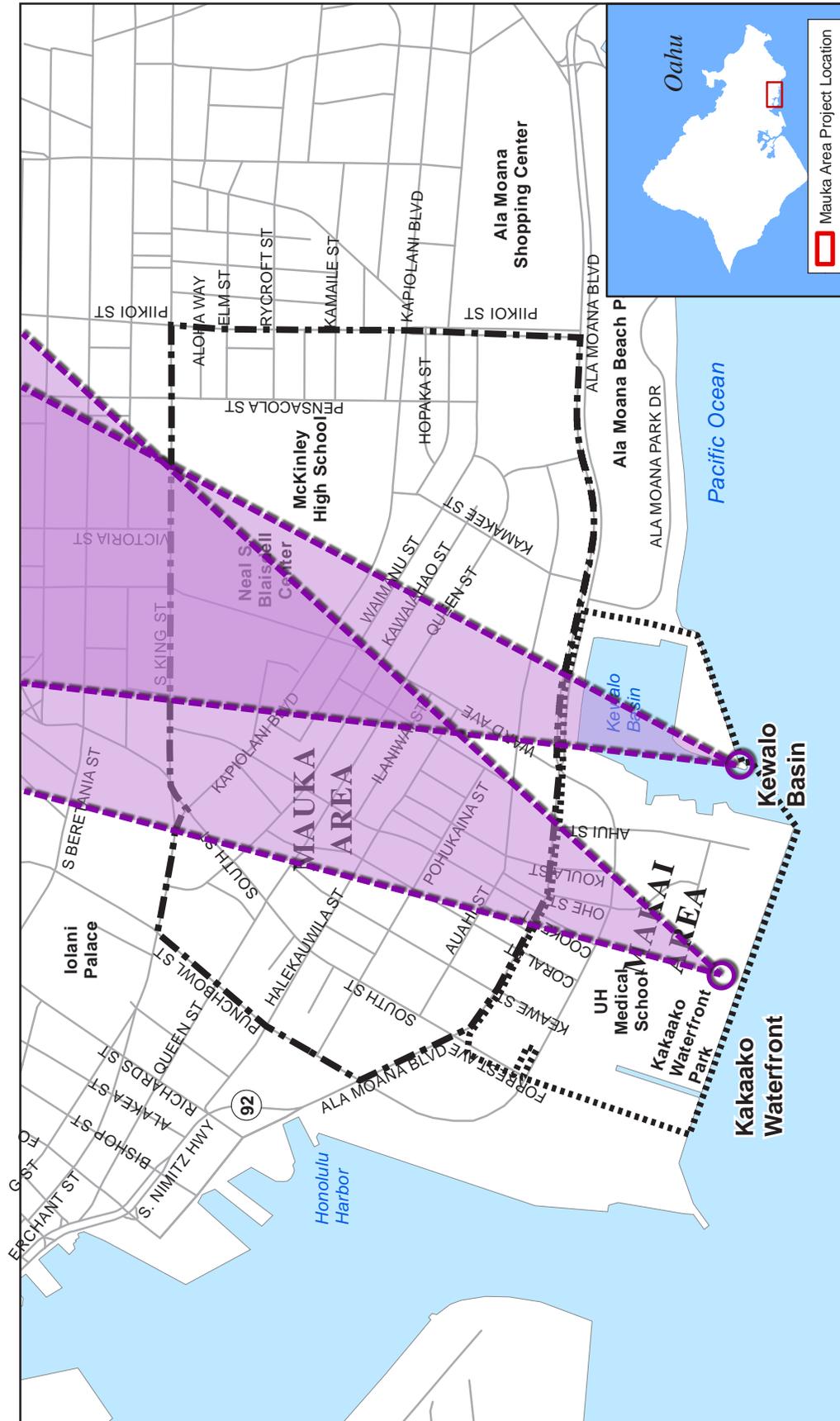
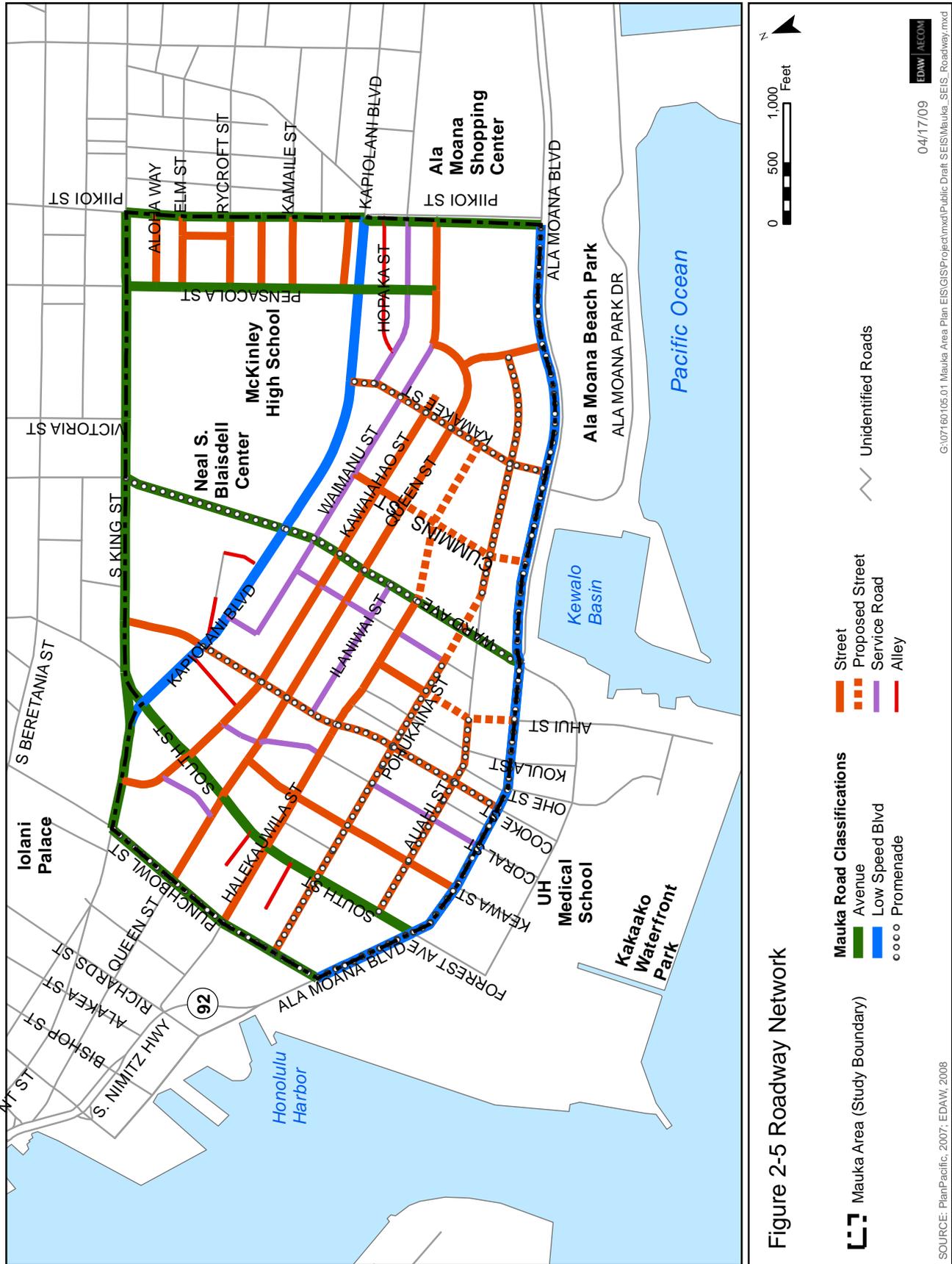


Figure 2-4 View Planes

-  Mauka Study Area
-  City PUC Development Plan Identified View Planes
-  City PUC Development Plan Identified Vantage Points





SOURCE: PlanPacific, 2007; ED&W, 2008  
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*Street:* Walkable, low speed (25 mph) thoroughfare in urban areas primarily serving abutting property. A Street is designed to connect residential neighborhoods with each other, connect neighborhoods with commercial and other districts, and connect local streets to arterials. Streets may serve as the main street of commercial or mixed-use sectors and emphasize curb parking. Goods movement is restricted to local deliveries only.

- *Service Street:* A Service Street is intended primarily to provide vehicular access to lots. The Service Street has two travel lanes, one parking/loading lane. The minimum right-of-way of 40 feet recognizes existing conditions in Central Kakaako, where lots are small and rights-of-way narrow. The pedestrian realm requires no front yard space and no trees.
- *Alley:* The Alley type provides the most basic form of vehicular access. It has been applied to a limited number of existing roads.

The Draft Mauka Area Plan designates Ala Moana Boulevard and Kapiolani Boulevard as Low-Speed Boulevards and King Street, Punchbowl Street, South Street, Ward Avenue, Pensacola Street, and Piikoi Street as Avenues. The remaining roadways are a mixture of Streets, Service Streets, and Alleys. Roadway cross-sections are shown in Figure 2-6 and Figure 2-7. The Draft Mauka Area Plan proposes several changes to the roadway network:

- Reserve portions of Halekauwila Street between Punchbowl Street and Ward Avenue, Queen Street near Kamakee Street, and Kona Street east of Pensacola Street for a fixed guideway system or other high-capacity transit route;
- Install a planted median along Ala Moana Boulevard between Punchbowl Street and Ward Avenue and reduce lane width from 12 feet to 10 feet;
- Remove on-street parking on Ward Avenue and Auahi Street between Queen Street and Auahi Street and install a planted median;
- Extend Cummins Street from Queen Street to intersect with Auahi Street and Ala Moana Boulevard;

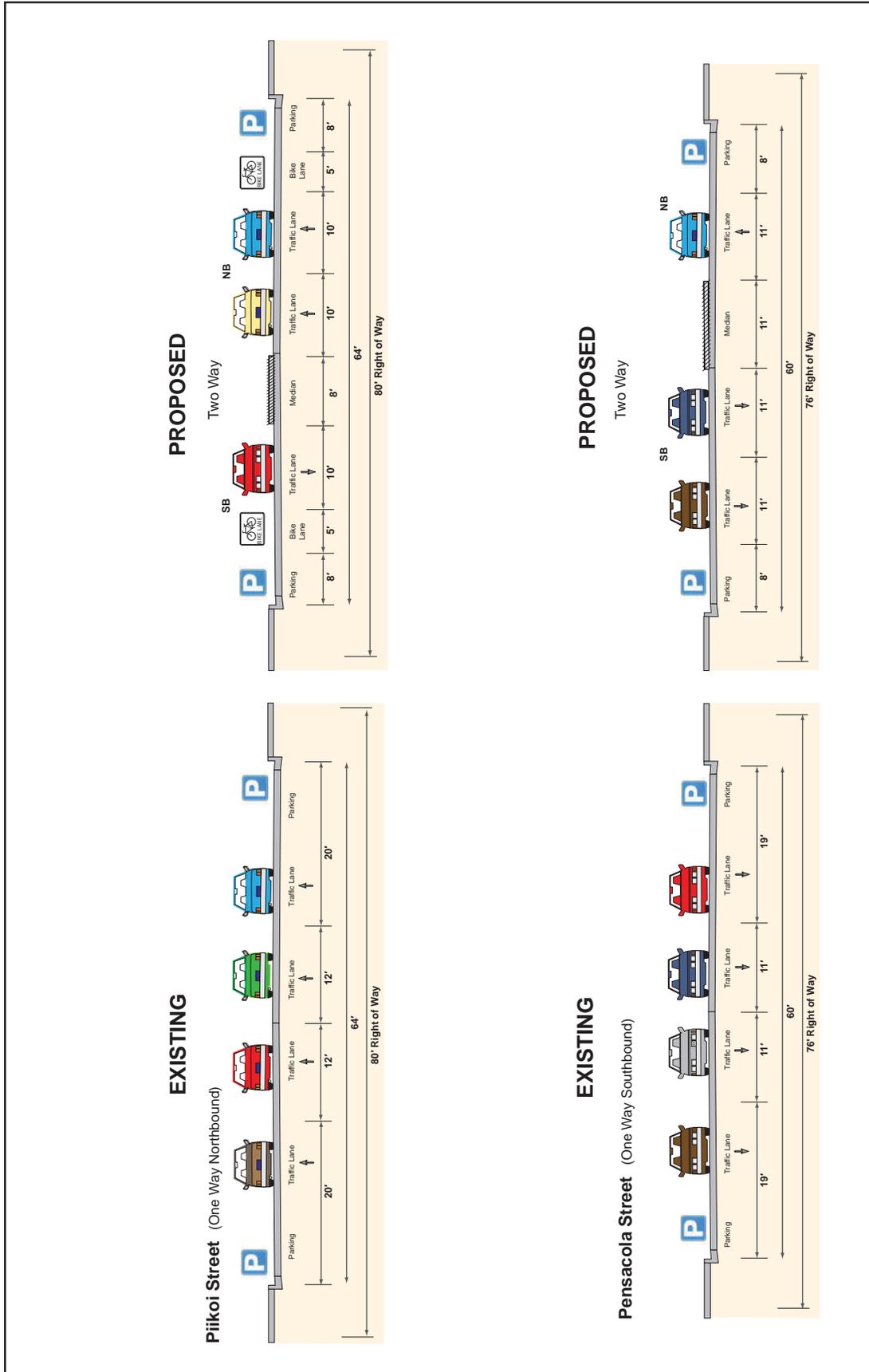


Figure 2-6 Draft Mauka Plan Roadway Cross Sections

Source: DMJM Harris, 2008

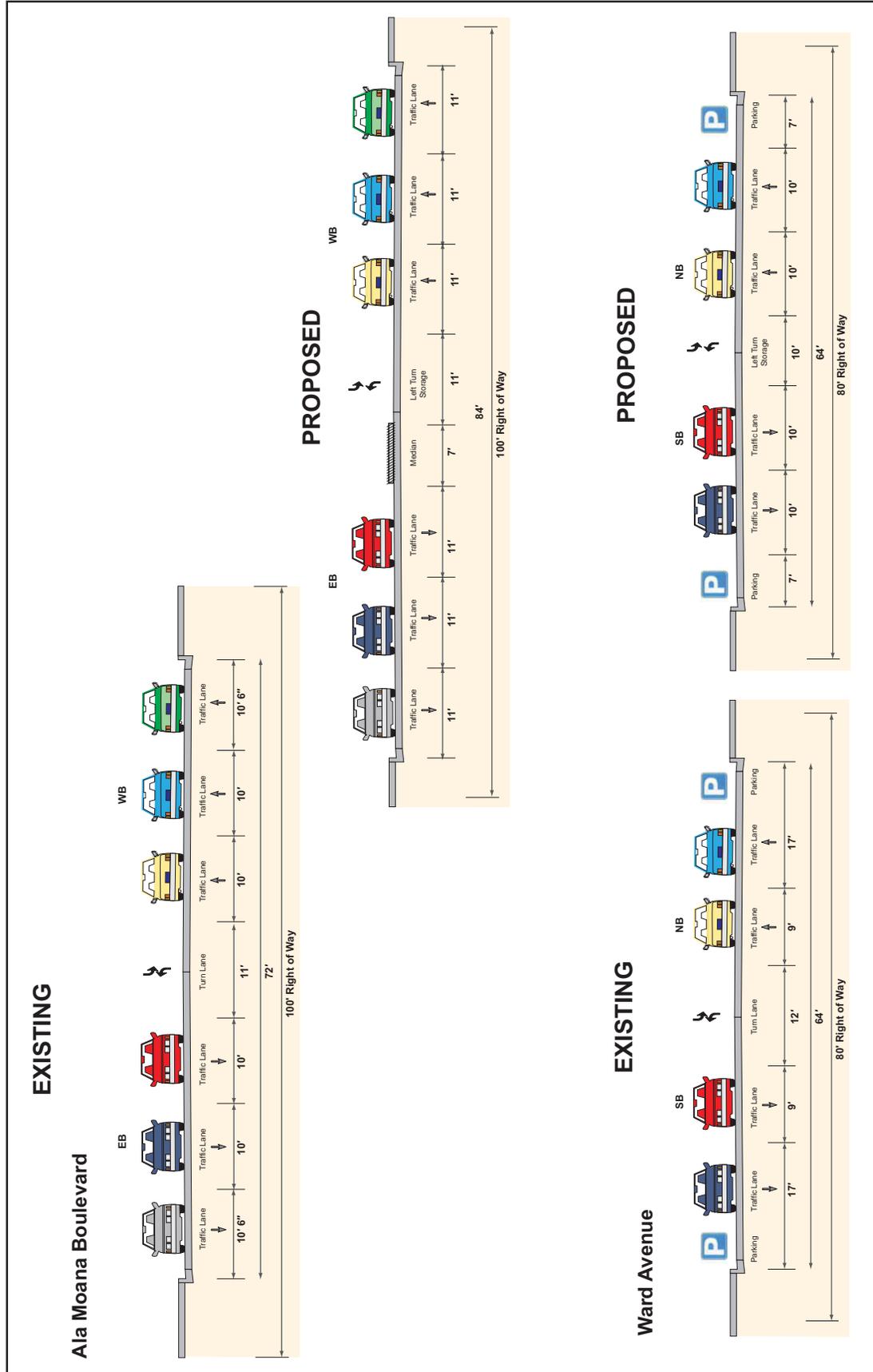


Figure 2-7 Draft Mauka Plan Roadway Cross Sections

Source: DMJM Harris, 2008

Realign Auahi Street to connect with Pohukaina Street at Pohukaina Street and redesign it as a promenade street;

- Extend Halekauwila Street east of Ward Avenue to Kamakee Street;
- Close off Ohe Street and Koula Street to vehicular traffic; Reconnect Ahui Street from Pohukaina Street to Ala Moana Boulevard, providing a connection with the west segment of Auahi Street;
- Reinstigate two-way traffic on Pensacola Street north of Kapiolani Boulevard (two southbound lanes and one northbound lane) and install a planted median; and
- Reinstigate two-way traffic on Piikoi Street north of Kapiolani Boulevard (two northbound lanes and one southbound lane) and install a planted median and bicycle lanes.

In addition, several streets such as Ward Avenue, Auahi Street, and Pohukaina Street would be designated for Promenade treatment, which would widen sidewalks and reduce roadway width.

## 2.6.2 Transit Network Changes

As shown in Figure 2-8, a fixed guideway transit system is currently in the planning stages for the congested east-west corridor between Kapolei and UH Manoa. The aim of the project is to provide faster, more reliable transit along the corridor, where many transit vehicles must operate in mixed-flow traffic, and serve as an attractive alternative to the private automobile. The project would strengthen the connection between Kapolei, Downtown Honolulu and the Mauka Area, UH Manoa, and Waikiki (“Honolulu High-Capacity Transit Corridor Project”, DTS).

A major goal of the Draft Mauka Area Plan is to encourage TOD, designed to facilitate and encourage transit use by placing relatively high-density development adjacent to or within easy walking access of major transit facilities such as stations on the fixed guideway system or transfer points between bus lines. TOD’s can also induce mode shifts by encouraging the use of non-motorized modes of travel, including pedestrian and bicycle travel.

## 2.6.3 Bikeway Network Changes

The Draft Mauka Area Plan proposes a new bicycle corridor along Piikoi Street and suggests the future re-striping of existing four-lane roadways such as Ward Avenue and Cooke Street to accommodate bicycle lanes. The designated “green” streets—Cooke Street, Pohukaina Street, and Kamakee Street—would also be designed to be bicycle-friendly and allow for safe bicycle connections to existing open space in the area.

## 2.6.4 Pedestrian Network Changes

Active street life is an essential ingredient for an urban village. While not every street needs to have wide sidewalks designed to attract large numbers of pedestrians, all streets should provide safe, pleasant, people-scaled walking conditions so that pedestrians have convenient routes to navigate through the neighborhoods for all kinds of trip purposes, including casual recreation

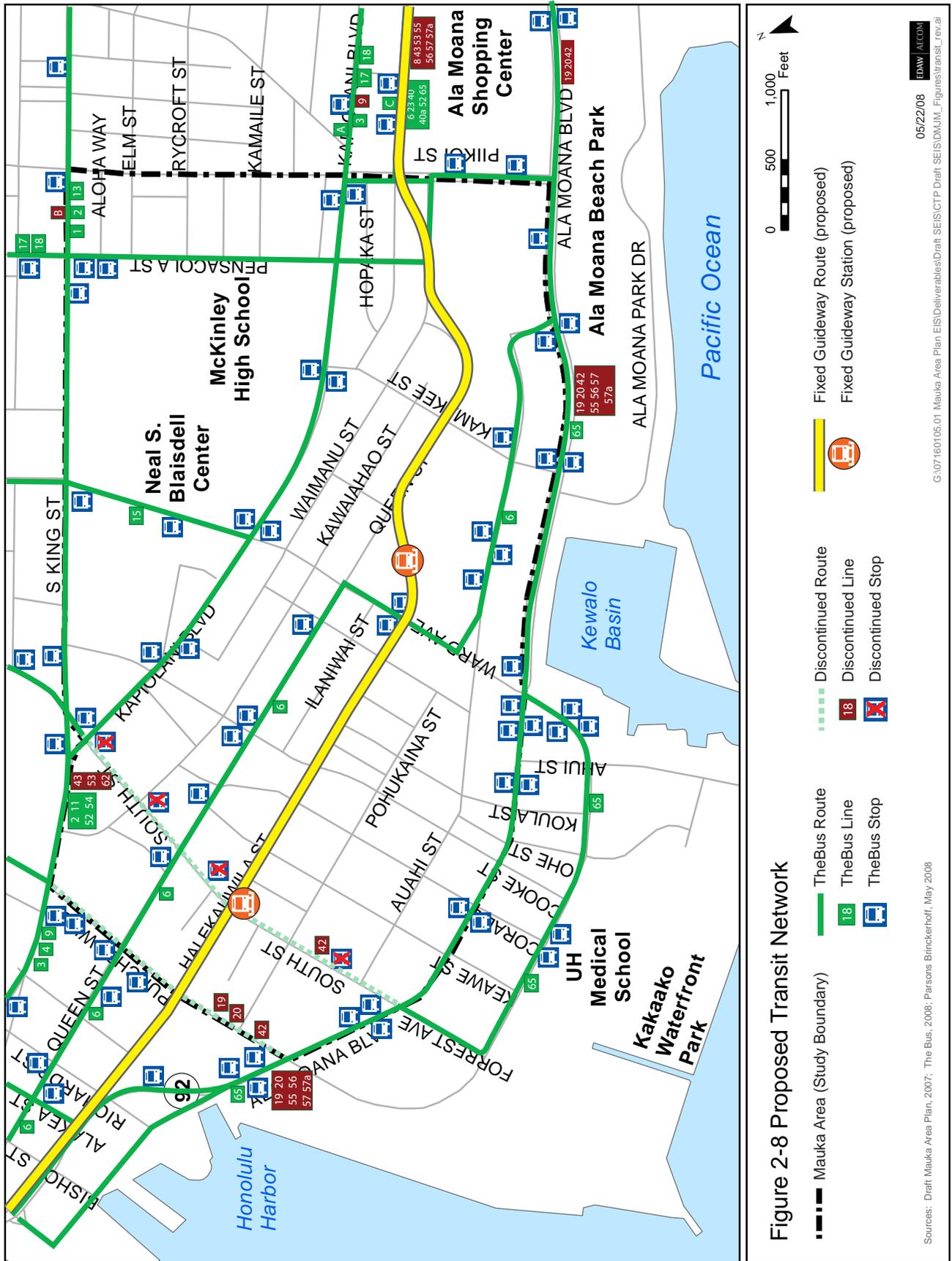
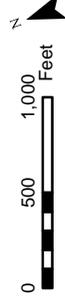


Figure 2-8 Proposed Transit Network

- Mauka Area (Study Boundary)
- Discontinued Route
- TheBus Route
- Fixed Guideway Route (proposed)
- 18 TheBus Line
- 18 Discontinued Line
- 18 Discontinued Stop
- Bus Stop
- Fixed Guideway Station (proposed)



Sources: Draft Mauka Area Plan, 2007; The Bus, 2006; Parsons Brinckerhoff, May 2008  
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and exercise. The Draft Mauka Area Plan uses the following classifications for pedestrian facilities:

- *Pedestrian Places:* These are districts of limited extent, with mixed-use land development, moderate to high densities, good transit service, great streets, and extensive pedestrian accommodation in the form of sidewalks, crosswalks, and other facilities. Here people will stroll and linger at store fronts and urban landscape features, walking for both utilitarian and recreational purposes. Pedestrian Places have people moving about between multiple activities.
- *Pedestrian Supportive Environments:* These include well-designed residential and commercial neighborhoods, employment centers, parks and recreational areas. These are safe environments for walking, where sidewalks are continuous and buffered from streets and wide enough for passing and walking side by side, and where good street crossings have been provided. Land uses are either dense enough to both generate and attract utilitarian walking trips of reasonably short lengths (half mile or less), or are of the sort that will attract recreational walkers and joggers. Buildings, not parking lots, face streets.
- *Pedestrian Tolerant Environments:* These are areas and corridors where walking is technically safe (there are continuous sidewalks and some kind of reasonably safe street crossings), but the land use patterns are such that little walking activity is likely to be generated. Tolerant environments provide pedestrian facilities, but include a very minimal level of accommodation.
- *Pedestrian Intolerant Environments:* Pedestrian Intolerant Environments are areas where walking is unsafe and unattractive. Examples include freeway corridors, certain industrial land uses, and roadways lacking continuous sidewalks. A major characteristic of Intolerant Environments is that they lack pedestrians, either due to a lack of pedestrian accommodations and/or dominance by automobile traffic and auto-oriented land uses.

The Draft Mauka Area Plan calls for a well-developed network of Pedestrian Tolerant and Pedestrian Supportive Environments, with wide, landscaped sidewalks and active building frontage that invite pedestrian traffic. Cooke Street, Pohukaina Street, and Kamakee Street would be designated as “green” streets and connect pedestrians and bicyclists with park and open space facilities both within and outside of the Mauka Area.

The Draft Mauka Area Plan emphasizes Mauka-Makai connectivity and identifies six intersections which would require special crosswalk design—such as ladder striping, flashing lights, and improved signage—in order to encourage this connectivity and promote continuity of the pedestrian network across major thoroughfares:

- Cooke Street / Ala Moana Boulevard;
- Ward Avenue / Queen Street;
- Ward Avenue / Pohukaina Street;
- Ward Avenue / Ala Moana Boulevard;
- Kamakee Street / Ala Moana Boulevard; and
- Piikoi Street / Ala Moana Boulevard.

The Draft Mauka Area Plan designates several streets for special “promenade” sidewalk treatment, which feature 15-foot-wide sidewalks by converting existing roadway right-of-way into pedestrian space. Roadways designated for this treatment include: Ala Moana Boulevard, Punchbowl Street, Ward Avenue, Cooke Street, Pohukaina Street, Kamakee Street, and Auahi Street.

The Draft Mauka Area Plan also proposes planters, street furniture such as benches, and onstreet parking to help create a buffer zone between pedestrians and street traffic. Promenade streets in the network would be designated as Pedestrian Supportive Environments, featuring active pedestrian-oriented street uses.

## 2.6.5 On-Street Parking Changes

The Draft Mauka Area Plan proposes that on-street parking be provided where appropriate, particularly on pedestrian-oriented and service streets. The provision of on-street parking would support local businesses by providing convenient access and serve as a buffer zone protecting pedestrians on the sidewalk from street traffic.

## 2.7 Reserved Housing

HCDA’s housing program is geared toward a specific housing product type that targets the workforce or the gap-group instead of the entire affordable spectrum. There are other State agencies such as the HHFDC that specializes in the development of affordable housing. Since inception of the Mauka Area Plan, affordable housing units have been developed within the Mauka Area by state agencies. As such, HCDA’s focus has been to stimulate the production of housing units for workforce buyers from 100 percent up to 140 percent of AMI by ensuring that a portion of residential projects are set aside, or *reserved* for this income group. The reserved housing is different from *affordable* housing, which is usually targeted at lower income groups.

Under the existing Mauka Area Plan, developers of residential projects take advantage of Planned Development benefits, which require 20 percent of the residential units of these projects available either for purchase or for rent by workforce households with income from 80 to 140 percent of AMI. Conditions for reserved housing are enforced through deed covenants in the initial purchase documents.

The revised Reserved Housing program in the Draft Mauka Area Plan is proposing that all new residential projects within the Mauka Area on lots of 20,000 square feet or more contribute to the development of Reserved Housing by producing the units or by paying fees to construct these units. In return for providing Reserved Housing, developers would receive non-monetary offsets in the form of density (or height) bonuses, modification to rules, and expedited permits.

As proposed, the Reserved Housing program will require that 20 percent of the residential floor area be reserved and developed for buyers or renters with qualifying incomes not more than 140 percent of AMI together with other restrictions. Prices and rents for these reserved units, together with qualifications for the buyers and renters will be established accordingly. The following describes the various Reserved Housing program features proposed in the Draft Mauka Area Plan.

### 2.7.1 Inclusionary Housing

HCDA prefers that all reserved housing units be provided on the proposed project site, generally known as “inclusionary”. Inclusionary housing programs also allow innovative communities to create housing for their workforce and enable families of moderate means to benefit from urban redevelopment. Mixed income communities broaden access to well-funded schools, strong municipal services, and emerging job centers. Mixed income communities also provide openings through which lower-wage earning families can buy homes in appreciating housing markets, accumulate wealth, and share a part of the “American Dream”. Inclusionary housing has a proven track record of meeting a community’s goal of providing housing available to residents of a wider economic range.

Although the preference is for inclusionary reserved housing units, if a developer finds it necessary to produce the reserved housing offsite, such a request will be evaluated on a project by project basis and could receive credits under HCDA’s housing program, although at a lower credit value than onsite units.

### 2.7.2 Preference for Units vs. In-Lieu Fees

In rare instances when there is a compelling reason why reserved housing units cannot be included or developed offsite, HCDA may consider accepting an “in-lieu” fee. However, in-lieu fees place the burden of developing reserved housing units on HCDA; therefore, HCDA’s preference is for the developers to construct the reserved housing units themselves rather than to allow payments of in-lieu fees. Except to resolve a case of fractional units, in-lieu fees will be discouraged. In-lieu fees received shall be deposited in HCDA Reserved Housing Sub-Account.

### 2.7.3 Cost Offsets

An effective Reserved Housing program usually offers developers a range of cost offsets to achieve a double bottom line: reserved housing for the public and a reasonable overall return for the developer. Profitability in the Mauka Area is important to ensure that developers will actually build in Kakaako, and therefore should be factored into any win-win Reserved Housing formula, especially since the development of any reserved housing depends on the development of housing in general.

### 2.7.4 Maintaining Affordability

Reserved housing units should remain affordable as long as reasonable. Therefore, long term constraint in sales of reserved housing for future generations are needed to expand the inventory of these units. Long term affordability may be achieved by different means, such as equity sharing upon resale, and a buy-back option in favor of HCDA.

Programs with long-term affordability terms can call for a sharing of equity upon resale which, while providing the incentive of the creation of wealth for the owner, makes reserved housing

ownership financially less attractive for speculators. These terms allow the owner to build some equity while effectively eliminating profiteering.

For units sold under the buy-back provision triggered by the homeowners decision to sell the unit prior to the expiration of the buy-back term, the purchase price to HCDA should be set as low as possible to the original reserved purchase price so the unit can be resold to another qualified buyer. Therefore, the buy-back price should be based on the original reserved purchase price inflated only by an appropriate inflationary index and owner paid unit improvements. This allows for the owner to extract some equity while keeping the unit still affordable.

On Reserved Housing units, HCDA proposes to require perpetual equity sharing with an allowance for the build-up of equity for the homeowner from the point of original purchase according to the homeowner's percentage share of ownership. The remaining portion of the equity would revert to HCDA's Reserved Housing Sub-Account upon resale. The equity sharing feature suggests that highest possible market sale price would be desirable. The proportion of the equity percentage will be established by the owner's purchase payment divided by the appraised market value for that unit at the point of original purchase.

### 2.7.5 Proposed Reserved Housing Program Checklist

Projects that include residential use on lots of 20,000 square feet or more, must comply with the following requirements:

- The project must set aside 20 percent of the residential floor area and develop it for reserved housing. The units shall be sold or rented by the developer as reserved housing;
- The reserved housing characteristics shall be negotiated with the HCDA to determine the unit counts, sizes, and types and initially priced for sale or rent to a buyer or a tenant with income from 100 percent up to 140 percent of AMI according to family size;
- The developer must sell the units, prices at or below 140 percent of AMI to qualified buyers with deeded covenants in favor of HCDA that includes a 10 year buy-back and perpetual equity sharing provision;
- The buy-back price shall be based on the original purchase price, inflated by an appropriate index and owner-paid unit improvements;
- An equity sharing percentage shall be set at the time of original purchase by a reserved housing buyer. HCDA's share of the equity upon resale will be transferred to the HCDA's Reserved Housing Sub-Account;
- The developer may also choose to develop rental units, in which case the reserved housing units shall be rented to tenants qualified at up to 100 percent of AMI. Such rental units will remain as reserved housing for a period of 15 years. The developer will be responsible for managing such units; and
- Exemptions from gross floor area include licensed life care facilities.

## 2.8 Historic and Cultural Resource Plan

### 2.8.1 Historic and Cultural Resources

The State Legislature has declared that sites of historical or cultural significance within the Mauka Area shall be protected. Therefore, the protection of these resources is an integral part of the Draft Mauka Area Plan. Table 2-1 indicates the sites selected for protection, the action recommended and the national or state designation.

**Table 2-1 Properties to be Protected in the Mauka Area**

Historic Site	Proposed Action <sup>1</sup>	National Register	Hawaii Register
Kawaiahao Church and Grounds	Preservation	yes	yes
Mission Houses	Preservation	yes	yes
Old Kakaako Fire Station	Rehabilitation	yes	yes
Mother Waldron Neighborhood Park Playground	Preservation	no	yes
McKinley High School	Rehabilitation	yes	no
Makiki Christian Church	Preservation	no	yes
Yee / Kobayashi Store	Restoration	no	yes
Royal Brewery Building	Preservation	yes	no

Source: Kakaako Community Development District Plan and Rules, 1982.

Notes: <sup>1</sup> Preservation means keeping a property in its present condition.

Rehabilitation means returning a property to a useful state while preserving significant features.

Restoration means accurately renovating or replacing the original form and details of historic structures.

Most of what we know today as Hawaii's urban form dates from the Post World War II era when Hawaii's rate of growth and development rapidly increased. Therefore, man-made resources which predate this period are reminders of Hawaii's past. The preservation of the historic and cultural resources displayed in Table 2-1 act as concrete evidence of our cultural past and help provide an appreciation of the origin of the cultures that have contributed to the development and uniqueness of what Hawaii is today. In addition to the resources listed in Table 2-1, the Draft Mauka Area Plan also proposes to protect the NBC due to its cultural and aesthetic values.

With respect to the privately-owned historic and cultural sites and buildings on HCDA's list, additional assistance to the owners shall be considered. HCDA shall review and consider the possibility of providing tax incentives, governmental grant-in-aid, and other financial and technical assistance to such owners. HCDA may propose amendments to existing laws and rules to implement these concerns.

Other sites of historic and cultural significance within the Mauka Area may be identified and added to HCDA's preservation list subsequently.

## 2.9 Social and Safety Plan

Chapter 206E, HRS directs HCDA to create in the Mauka Area, a community that serves the highest needs and aspirations of Hawaii's people. Such a community must provide all of the basic needs of its residents, employees, and visitors in a safe and socially desirable environment.

## 2.9.1 Social Proposals

To address the social needs of Mauka Area residents, the Draft Mauka Area Plan considers well-designed, sensitive, attractive, and accessible open space and recreational resources, pedestrian connections to activity centers, and public facilities that encourage the positive interaction of individuals and groups. The social needs of the Mauka Area will largely be met by the provision of housing support facilities. The operation of these facilities should promote the well being of the residents by ensuring that:

- Fees for their services are affordable;
- Priority be given to serving the residents and employees within the Mauka Area;
- Services are competently administered;
- Public funding assistance is secured for services to low-income and needy elderly households; and
- Efforts shall be made to provide appropriate and progressive child care and gerontology programs. To the extent possible, joint facilities shall be developed so that each group may benefit from its relationship with the other.

## 2.9.2 Public Safety Proposals

A mixed-use community providing a variety of business and residential activities can be a place of continuing human activity, thus decreasing the inactivity periods and acting as a possible deterrent to crime and vandalism.

Building interiors, grounds, landscaping, on-site parking and exterior common areas should be well lit and designed to minimize pockets where intruders may cause harm to others.

Safety shall be an element of consideration in the urban design review of all development permits. Emphasis shall be placed on assuring the installation of adequate lighting, installation of security equipment, or the hiring of security personnel, and the isolation of hazardous areas and facilities from access by children or the handicapped. Landowners and residents of the Mauka Area are encouraged to form informal neighborhood watches and other associations.

## 2.10 Relocation Plan

Redevelopment of the Mauka Area will require construction of additional public facilities and utilities as well as the redevelopment of land uses. Displacements of existing uses and businesses may result from two major causes: (1) public actions resulting in the construction of public facilities such as streets, housing, parks, and parking garages and other infrastructure systems; and (2) private actions, independently made, or induced by public planning decisions. Privately caused displacements may result from private demolition and new construction, private rehabilitation projects, and displacement due to rising market prices and rents.

### 2.10.1 Relocation Proposals

Relocation refers primarily to displacement resulting from government-initiated projects. Households and businesses displaced by private sector actions shall receive certain public assistance service short of monetary payments.

To provide meaningful relocation assistance for all persons and businesses displaced due to public action, HCDA proposes the following:

- To phase redevelopment to minimize disruptions;
- To ensure that families and businesses are, to the extent practicable, properly relocated before permitting their displacement by new development, redevelopment or neighborhood rehabilitation;
- To return as many persons displaced by government actions back to the Mauka Area;
- To provide opportunities for persons displaced by government action to avoid major financial loss;
- To minimize or ameliorate any serious negative impacts of displacement, such as loss of employment or business, imminent loss of shelter, and monetary losses; and
- To provide counseling, information, and referral services to displaced businesses affected by private sector actions, induced or stimulated by governmental planning decisions.

In an effort to minimize inconvenience incurred on displaced households and businesses for government-initiated projects, the Draft Mauka Area Plan proposes to provide relocation assistance that includes providing financial benefits and relocation services. To achieve this objective, HCDA proposes assistance payments necessary to meet reasonable relocation expenditures for displaced persons, facilities, and businesses. Equitable assistance may include, but not be limited to: payments to displaced businesses to aid moving costs; allowance to relieve relocation effort; substitute payments to assist owner-occupants who purchase; rent subsidy to owner-occupants; substitute payments to assist tenant-occupants who purchase or rent; and substitute housing subsidy for tenants.

Every effort shall be made to provide displacees of households and businesses resulting from public acquisition with comparable replacement facilities at reasonable rates. HCDA shall seek to establish temporary relocation facilities for displaced businesses until they can be re-established in their prior or substitute location within the Mauka Area.

Among the functions to be performed by HCDA's relocation assistance office are the following:

- Assistance to the State and County displacing agencies in the development and implementation of relocation assistance programs for specific public improvement projects;
- Advisory services to displaced individuals and businesses of government actions, such as information on Federal and State programs, loans, and other benefits; handling appeals;

personal contact with each displaced person; and assistance in finding replacement sites and in actual relocation;

- Coordination of relocation activities with other project activities and other planned or proposed City and State agency actions within the community or nearby areas; and
- Advisory services to displaced individuals and businesses of private sector actions, or to persons or business concerns occupying property adjacent to any property acquired for public improvement and are caused substantial economic injury because of the public improvement.

## 2.11 Public Facilities Program

The Draft Mauka Area Plan proposes a public facilities program that will provide various public facilities for creating neighborhoods that give Mauka Area residents, employees, and visitors a sense of identity and belonging.

### 2.11.1 Overview of the Program

Adhering to Chapter 206E, HRS, the goal in redeveloping the Mauka Area is to provide a full array of public facilities required to support development project. Such facilities include streets, utility and service corridors, and utility lines sufficient to adequately service development improvements. It also includes schools, parks, parking garages, sidewalks, pedestrian ways, bikeways, and other community service infrastructure normally provided by the public sector.

### 2.11.2 Public Facilities Proposals

The policy of this program is that public facilities be located on sites which will be convenient for the people they are intended to serve and be designed to meet the needs of the population. Whenever compatible, different types of public facilities will be located in such a way as to enhance the convenience to the public and to reduce the cost of constructing such facilities.

The need for public facilities is based upon population/facility requirement standards. As an example, current school facilities in proximity to the Mauka Area are adequate to accommodate some increase in the school age population. A new school may need to be established as the school age population increases to a level which warrants additional school facilities. The site adjacent to the Mother Waldron Neighborhood Park Playground is anticipated to be developed together as a park, school, and a community center facility that will service the Kakaako District. In the long-term, HCDA will coordinate educational needs of the Kakaako District with the Department of Education (DOE).

Additional police and fire protection services for the projected population are not expected to be required. Additional major health care services such as hospitals and clinics are also not expected to be required. But minor health facilities such as doctors and dental offices are allowed in proximity to residents.

### 2.11.3 Public Facilities Plan Provisions

In order to achieve the objectives of this section, adequate public facilities in the Mauka Area will be provided by the following means:

- Public construction of new public facilities especially in conjunction with the phasing of ID Programs;
- Improvement or modification of existing public facilities to meet increased needs;
- Private development and dedication of public facilities in response to publicly provided incentives; and
- Assessment of the private sector for the costs of public facilities which benefit private sector developments.

## 2.12 Infrastructure and Utilities Plan

The KCDD Mauka Area Infrastructure Plan supports the Draft Mauka Area Plan, and proposes to establish an infrastructure system that adequately supports future redevelopment, development growth, and diversification and densification of land use and population. The proposed infrastructure system would support a population projection out to the year 2030 and possibly beyond depending on the rate of redevelopment. A summary of the existing infrastructure assessment and recommendations for improvement are discussed in this section and section 3.13 of the SEIS.

### 2.12.1 Improvement District Program

Since its establishment in 1976, one of the main foci of the HCDA has been to improve the Kakaako District's network of streets and infrastructure to facilitate and encourage redevelopment and growth and maintain a safe, active community where its visitors and residents may comfortably and conveniently live, work and recreate. The HCDA has progressed toward accomplishing this through ID Program, which was used to implement roadway and utility improvements within the Kakaako District. This program was largely funded by the Hawaii State Legislature, with contributions from property owners and public utility companies, and focused on reconstructing and/or widening streets; installing streetlights, curbs, gutters and sidewalks; improving drainage, sewer and water systems; and, upgrading and undergrounding electrical power and telecommunication. Approximately \$203 million has been expended to complete 10 ID Projects, five of which were within or partly within the Mauka Area. This has resulted in over \$2 billion of investment in private-sector projects in the area.

Infrastructure development has recently invoked concerns by some small businesses and landowners in central Kakaako. A sixth ID Project within the Mauka Area was planned to improve Queen Street between Ward Avenue and Kamakee Street, but was cancelled in January 2007 by the HCDA due to strong resistance from the landowners anticipating business losses and impacts to their properties. The HCDA hopes to continue its ID Program through continued coordination with the community to develop approaches to implement infrastructure and

roadway improvements while supporting and creating increased economic opportunities for small business owners and owners of small land parcels in the Mauka Area.

### 2.12.2 Existing Infrastructure

The existing infrastructure was assessed to verify whether the general conditions and capacities would be able to support density and population forecasts out to the year 2030. If the infrastructure could support these projections, they are recommended to remain unaltered; otherwise, they are recommended for improvement through replacement with larger lines. Recommended utility improvements would meet current design criteria and standards to conform to regulatory government agency and utility company codes and standards. Design and construction within the Mauka Area fall under the regulation and approval of the City; thus, any required municipal infrastructure improvements shall conform to City guidelines and standards. The infrastructure in the Mauka Area is comprised of the following types:

- Storm Drain Systems;
- Sanitary Sewer Systems;
- Solid Waste Disposal Program;
- Water Systems;
- Synthetic Natural Gas Systems;
- Electrical Power Systems;
- Telephone, Cable Television and Communication Systems;
- Traffic Signal Systems;
- Roadway Street Light Systems; and
- Roadways.

### 2.12.3 Infrastructure Evaluation

The findings and recommendations of the KCDD Mauka Area Infrastructure Plan for each type of infrastructure are as follows:

#### Hydrology and Storm Drain Systems

~~The design storm for the City is the 100-year recurrent, 24-hour duration rainfall. Of which, the existing drainage system within the Kakaako District is inadequate to accommodate the City design flows for both the existing and future conditions when taking flow from outside the district into account that contribute to the existing storm drain system. However, the drainage system is adequate to manage storm water contribution from within the Mauka Area only.~~

The design storm for the City for the entire Mauka Area and any developments and redevelopments within the Mauka Area greater than 100 acres in total disturbed area is the 100-year recurrent, 24-hour duration rainfall, of which flows are determined through the use of Plate 6 in the City Storm Drainage design standards, Rules Relating to Storm Drainage Standards. The design storm for the City for developments and redevelopments within the Mauka Area up to 100 acres in total disturbed area is either the 10-year or 50-year recurrent, 1-hour duration rainfall, depending on whether the project occurs within a non-sump or sump area, respectively. The existing Mauka Area drainage system can accommodate and dispose of flows from both of these rainfalls, in addition to, the more frequent, day-to-day rainfall occurrences and intensities.

The Mauka Area is a subsystem within an overall, rainfall-catchment watershed basin that encompasses surrounding areas from mountain to ocean.

The existing drainage system within the entire Kakaako District is inadequate to accommodate the City design flows for both the existing and future conditions when taking flow from outside the district within the same rainfall-catchment watershed basin into account that contribute to the existing storm drain system. However, the existing drainage system is able to accommodate and dispose of the more frequent, day-to-day rainfall occurrences and intensities.

Improvements and upgrades by the City to bring the drainage system up to a size large enough to accommodate both Kakaako District flow in addition to the off-site flow are not practicable due to budgetary and space constraints. Nonetheless, the flow contribution to the drainage system by the Mauka Area is anticipated not to increase due to the relative, impermeable character of the developed land (percentage of hard surface) would not altering significantly by the year 2030, and as such, the amount of runoff contributions to the existing drainage system would not increase and worsen the condition from the current state (as development and redevelopment would be primarily vertical, which does not affect runoff quantities).

Practical roadway improvements compliant with City requirements are proposed to mitigate localized storm water ponding within uncurbed roads. Water capture and reuse by developments and redevelopments, and increased plantings of groundcover and vegetation within roadway ROWs, lots, building decks and rooftops would reduce surface runoff and improve storm water quality.

Additionally, a field reconnaissance was performed in January 2008 to determine the conditions of the existing drainage structures (catch basins, manholes, concrete gutters, etc.) and mains (pipes and box drains) within the Mauka Area. Access covers to manholes and catch basins along main drain trunks were opened and a visual assessment was made of the structure's interior, as well as, the incoming and outgoing pipes. The percentage of any drainage structures (or pipe segments) in need of improvement based on any observed deteriorated condition in comparison to the overall number of that particular structure (or length of inspected lines of that particular pipe size and material) would be applied as the overall percentage to that particular structure (or line size and material) that is recommended for system improvements of the entire Mauka Area.

### Sanitary Sewer Systems

Upgrades of branch sewer lines are proposed to meet City standards. Approximately 18,000 feet of sewer trunk lines within the Mauka Area are recommended to be replaced with larger trunk lines to accommodate year 2030 demands.

Additionally, segments of sewerlines along Queen Street, South Street and Ward Avenue were inspected using a closed circuit television (CCTV) system in January 2009 to determine the existing conditions of the lines. This inspection, in conjunction with existing CCTV of the Sheridan Neighborhood area taken during the late 1990's for the City were together viewed as a representative samples of existing sewerline conditions within the Mauka Area. The percentage of any pipe segments in need of improvement based on its deteriorated condition in comparison to the overall length of inspected lines of that particular pipe size and material would be applied

as the overall percentage to that particular line size and material that is recommended for system improvements of the entire Mauka Area.

#### Solid Waste Disposal Program

Specific improvements and modifications to the solid waste disposal program within the Mauka Area other than expansion of service coverage area as required are not proposed. The existing mix of private and public collection services would be able to meet future collection demands generated by increases in land use and population.

#### Water Systems

Approximately 16,000 feet of new waterlines and related upgrades and improvements to the existing water distribution system are proposed to meet projected domestic water consumption and fire protection demands projected for the year 2030.

Additionally, recommendations to replace existing waterline segments are proposed, based on locations and frequencies of waterline break occurrences.

#### Synthetic Natural Gas Systems

Upgrades and improvements are not proposed for the synthetic natural gas transmission and distribution systems. The Gas Company has indicated that they expand and upgrade their systems on their own to accommodate any required coverage expansions or increases in service demand. This is accomplished either through the installation of larger or new mains, service laterals and meters, or through the provision of containerized gas.

#### Electrical Power Systems

Future power demands are anticipated to be met through the installation of either one, or possibly two, new electrical power substations to expand power capacity. Due to factors such as, but not limited to, land acquisition requirements and available construction funding, specific siting for additional substations is not indicated. Methods for meeting future electrical needs would be decided by the governing electrical power company. To the maximum extent practicable as limited by budgetary and space constraints, new electrical power and telecommunication lines would be located underground within public street ROW, and existing overhead lines shall be phased out to enhance the overall general visual aesthetics and safety of the streetscape.

Additionally, HCDA requested maintenance and outage records from HECO that would serve as a basis for any suggestions for the repair, replacement or improvement of existing electrical power facilities based on locations and frequencies of outages. As a regulated public utility, the HECO bears the responsibility to provide reliable electric service to the public as mandated by their tariff which would include taking all corrective actions to repair and maintain their generation and delivery facilities and also address any deficiencies in their ability to provide service to all electric service requestors.

### Telephone, Cable Television and Communications Systems

Telephone requirements are forecasted to increase to 70,000 service lines necessitating associated cable plant expansion by the telephone company into existing or new conduit systems within the Mauka Area roadways. Methods for meeting future communications needs would be determined by the governing telephone company. ~~Future cable television improvements are not forecasted. Methods for meeting future cable television service demands would be determined by the governing cable television company.~~

Additionally, HCDA requested maintenance and outage records from HTCo that would serve as a basis for any suggestions for the repair, replacement or improvement of existing telephone and communications facilities based on locations and frequencies of outages. As a regulated public utility, HTCo bears the responsibility to provide reliable telephone service to the public as mandated by their tariff which would include taking all corrective actions to repair and maintain their switching and delivery facilities and also address any deficiencies in their ability to provide service to all telephone service requestors.

### Cable Television Systems

Future cable television improvements are not forecasted. Methods for meeting future cable television service demands would be determined by the governing cable television company.

Additionally, HCDA requested maintenance and outage records from Oceanic that would serve as a basis for any suggestions for the repair, replacement or improvement of existing cable television facilities based on locations and frequencies of outages. As a Department of Commerce and Consumer Affairs franchisee and as a for-profit company, Oceanic would expand and upgrade their systems on their own to accommodate any required coverage expansions or increases in service demand.

### Traffic Signal Systems

Traffic signalization devices are proposed at three four-way stop intersections. The installation of these devices shall be in compliance with applicable regulatory agency standards, codes and guidelines. All traffic signals, whether on State or City roadways are maintained by the City DTS which bears the responsibility for ensuring that the signal controller and signal heads are operating and the traffic signal programming is functional. The State and City also review traffic incidents to establish whether a new traffic signal is warranted.

### Roadway Street Light Systems

Street lighting and ~~associated~~ traffic signal timing systems are proposed along new roadways, as required. The installation of these facilities shall be in compliance with applicable regulatory agency standards, codes and guidelines. Street lights on City-owned roads are maintained by the City Department of Facility Maintenance which bears the responsibility for ensuring that the street lights are operating. Street lights on State-owned roads are maintained by the State Department of Transportation which bears the responsibility for ensuring that the street lights are operating.

## Roadways

Existing streets are proposed to be brought up to City standards wherever possible and not limited by space. New streets, space permitting, are proposed to be designed to City codes and criteria governing pavement section, lane widths, sidewalks, bike lanes (in accordance with the State's *Bike Plan Hawaii*), curbs, gutters, planter areas, sight distance requirements, stopping distance requirements, radii, Americans with Disabilities Act (ADA) curb ramps, accessible routes, signage, crosswalks, and pavement marking and striping.

Additionally, recommendations to repair areas of asphaltic concrete pavement are proposed based on observed pavement surface distresses during field reconnaissance in January 2008 and February 2009, to minimize the potential for additional pothole formation, further worsening of pavement distress, or eventual pavement failure.

### 2.12.4 Cost Estimates

Table 2-2 lists a summary of the probable costs of infrastructure-related construction.

**Table 2-2 Cost Summary**

<b>Infrastructure System</b>	<b>Construction Estimate</b>
Storm Drain	\$5,549,000
Sewer	\$49,482,000
Water	\$4,700,000
Electrical	\$15,770,000
Telephone	\$7,705,000
Cable Television	\$2,585,000
Traffic Signalization	\$900,000
Street Light	\$5,140,000
Street Improvements	\$21,870,000
Total	\$113,701,000

Source: M&E Pacific, 2008

## Storm Drain

Drainage improvements may include 18-inch drain line and appurtenant drain inlets and/or catch basins along the street noted in Table 2-3:

**Table 2-3 Drainage Improvement Costs**

<b>Streets</b>	<b>Specification</b>	<b>Cost</b>
Waimanu Street between Drier Street and Kamakee Street	2,320 linear feet @ \$450/LF	\$1,044,000
Kawaiahao Street between Cooke Street and Kamakee Street	2,600 linear feet @ \$450/LF	\$1,170,000
Queen Street between Cooke Street and Kamakee Street	2,600 linear feet @ \$450/LF	\$1,170,000
Ilaniwai Street between Cooke Street and Ward Avenue	1,200 linear feet @ \$450/LF	\$ 540,000
Halekauwila Street between Cooke Street and Ward Avenue	1,100 linear feet @ \$450/LF	\$ 500,000
Koula Street between Halekauwila Street and Pohukaina Street	440 linear feet @ \$450/LF	\$ 200,000
Ahui Street between Halekauwila Street and Pohukaina Street	440 linear feet @ \$450/LF	\$ 200,000
Kamani Street between Halekauwila Street and Pohukaina Street	440 linear feet @ \$450/LF	\$ 200,000
Kona Street between Kamakee Street and Pensacola Street	660 linear feet @ \$450/LF	\$ 300,000
Hopaka Street between Kona Street and Pensacola Street	500 linear feet @ \$450/LF	\$ 225,000
<b>Total</b>		<b>\$5,549,000</b>

Source: M&E Pacific, 2008

### Sewer

The estimated construction costs in 2008 dollars for the previously identified sewer system improvements are listed in Table 2-4.

**Table 2-4 Sewer System Improvement Costs**

<b>Type of Improvement</b>	<b>Specification</b>	<b>Cost</b>
48-inch sewer	3,100 feet at \$2,900/ft =	\$ 8,990,000.
36-inch sewer	150 feet at \$2,300/ft =	\$ 345,000.
24-inch sewer	1,100 feet at \$1,400/ft =	\$ 1,540,000.
21-inch sewer	2,300 feet at \$1,200/ft =	\$ 2,760,000.
30-inch sewer	1,600 feet at \$1,700/ft =	\$ 2,720,000.
27-inch sewer	250 feet at \$1,600/ft =	\$ 400,000.
24-inch sewer	1,200 feet at \$1,400/ft =	\$ 1,680,000.
66-inch sewer	2,660 feet at \$4,100/ft =	\$ 10,906,000.
48-inch sewer	330 feet at \$2,900/ft =	\$ 957,000.
42-inch sewer	2,440 feet at \$2,600/ft =	\$ 6,344,000.
90-inch sewer	1,200 feet at \$5,600/ft =	\$ 6,720,000.
84-inch sewer	1,200 feet at \$5,100/ft =	\$ 6,120,000.
<b>Total</b>		<b>\$49,482,000</b>

Source: M&E Pacific, 2008

Water

The estimated construction costs in 2008 dollars for the previously identified water system improvements are listed in Table 2-5.

**Table 2-5 Water System Improvement Costs**

Type of Improvements	Specification	Cost
18-inch water main	900 feet at \$200/ft =	\$ 180,000
18-inch water main	6,600 feet at \$200/ft =	\$1,320,000
16-inch water main	1,400 feet at \$200/ft =	\$ 280,000
16-inch water main	2,900 feet at \$400/ft =	\$1,160,000
16 inch water main	1,000 feet at \$400/ft =	\$ 400,000
16-inch water main	1,800 feet at \$400/ft =	\$ 720,000
16-inch water main	1,600 feet at \$400/ft =	\$ 640,000
<b>Total</b>		<b>\$4,700,000</b>

Source: M&E Pacific, 2008

Electrical

HECo appears to have sufficient conduits to extend their 46-kV transmission cables underground from Archer Substation on the HECo Ward Avenue compound to the proposed Cooke Street Substation. The 12.47-kV feeders emanating from the Cooke Street Substation would be connected to existing and new underground feeders to support the proposed development. Assumed costs are shown in Table 2-6.

**Table 2-6 Electrical Improvement Costs**

Street	Specification	Cost
Keawe Street	12.47 kV Distribution	\$ 240,000.
Waimanu Street	46 kV and 12.47 kV Distrb.	\$ 3,530,000.
Kawaihāo Street	46 kV and 12.47 kV Distrb	\$ 3,140,000.
Ilaniwai Street	46 kV and 12.47 kV Distrb	\$ 1,610,000.
Halekauwila Street	12.47 kV Distribution	\$ 420,000.
Auahi Street	12.47 kV Distribution	\$ 950,000.
Hopaka Street	12.47 kV Distribution	\$ 580,000.
Kona Street	12.47 kV Distribution	\$ 440,000.
Queen Street Extension	46 kV and 12.47 kV Distrb	\$ 1,340,000.
Pensacola Street	12.47 kV Distribution	\$ 360,000.
Piikoi Street	46 kV and 12.47 kV Distrb	\$ 1,000,000.
Cummins Street	12.47 kV Distribution	\$ 280,000.
Kamani Street	12.47 kV Distribution	\$ 760,000.
Koula Street	12.47 kV Distribution	\$ 440,000.
Ahui Street	12.47 kV Distribution	\$ 260,000.
Pohukaina Street	12.47 kV Distribution	\$ 420,000.
<b>Total</b>		<b>\$ 15,770,000.</b>

Source: M&E Pacific, 2008

Telephone

Based on the available existing plans pertinent to the Mauka Area telephone infrastructure, HTCo. appears to have sufficient conduits to extend additional service from their Alakea and Kakaako Central Offices to the Mauka Area. These costs are shown in Table 2-7.

**Table 2-7 Telephone Improvement Costs**

<b>Location</b>	<b>Costs</b>
Keawe Street	\$ 175,000.
Waimanu Street	\$ 1,260,000.
Kawaiahao Street	\$ 1,200,000.
Ilaniwai Street	\$ 580,000.
Halekauwila Street	\$ 310,000.
Auahi Street	\$ 720,000.
Hopaka Street	\$ 440,000.
Kona Street	\$ 330,000.
Queen Street Extension	\$ 460,000.
Pensacola Street	\$ 270,000.
Piikoi Street	\$ 340,000.
Cummins Street	\$ 210,000.
Kamani Street	\$ 580,000.
Koula Street	\$ 330,000.
Ahui Street	\$ 190,000.
Pohukaina Street	\$ 310,000.
<b>Total</b>	<b>\$ 7,705,000.</b>

Source: M&E Pacific, 2008

Gas

The Gas Company evaluates each request for new gas service on a case-by-case basis with gas system upgraded as required. Site-specific recommendations are not warranted.

Cable

After the construction of the Oceanic ductline along Ala Moana Boulevard, Oceanic may be able to reconfigure its system to lessen the impact on the existing telephone ductlines constructed under the HCDA Kakaako Improvement District Nos. 1, 2 and 3. Cable improvement costs are shown in Table 2-8.

**Table 2-8 Cable Improvement Costs**

<b>Location</b>	<b>Costs</b>
Keawe Street	\$ 60,000.
Waimanu Street	\$ 420,000.
Kawaiahao Street	\$ 380,000.
Ilaniwai Street	\$ 200,000.
Halekauwila Street	\$ 110,000.
Auahi Street	\$ 240,000.
Hopaka Street	\$ 150,000.
Kona Street	\$ 110,000.
Queen Street Extension	\$ 160,000.
Pensacola Street	\$ 90,000.
Piikoi Street	\$ 120,000.
Cummins Street	\$ 70,000.
Kamani Street	\$ 190,000.
Koula Street	\$ 110,000.
Ahui Street	\$ 65,000.
Pohukaina Street	\$ 110,000.
<b>Total</b>	<b>\$ 2,585,000.</b>

Source: M&E Pacific, 2008

### Traffic Signalization

Costs associated with traffic signal timing and coordination changes are shown in Table 2-9. It is recommended that these changes be implemented as a single construction package rather than installed as separate projects.

**Table 2-9 Traffic Signalization Improvement Costs**

<b>Location</b>	<b>Cost</b>
Kamekee Kamani/Queen Streets	\$ 300,000.
Halekauwila/Cooke Streets	\$ 300,000.
Pohukaina/Cooke Streets	\$ 300,000.
<b>Total</b>	<b>\$ 900,000.</b>

Source: M&E Pacific, 2008

Street Light

As the existing overhead utility lines are placed underground, the joint pole-mounted street lights would be converted to conventional street lights on concrete foundations. Additional electrical metering locations may need to be sited in order to provide power to the street light systems. Costs for street light improvements are shown in Table 2-10.

**Table 2-10 Street Light Improvement Costs**

<b>Location</b>	<b>Cost</b>
Keawe Street	\$ 120,000.
Waimanu Street	\$ 840,000.
Kawaiahao Street	\$ 750,000.
Ilaniwai Street	\$ 390,000.
Halekauwila Street	\$ 210,000.
Auahi Street	\$ 480,000.
Hopaka Street	\$ 300,000.
Kona Street	\$ 220,000.
Queen Street Extension	\$ 320,000.
Pensacola Street	\$ 180,000.
Piikoi Street	\$ 240,000.
Cummins Street	\$ 140,000.
Kamani Street	\$ 380,000.
Koula Street	\$ 220,000.
Ahui Street	\$ 130,000.
Pohukaina Street	\$ 220,000.
<b>Total</b>	<b>\$ 5,140,000.</b>

Source: M&E Pacific, 2008

Roadway

Proposed street improvements range from widening of Ala Moana Boulevard, extending Halekauwila from Ward to Auahi, extending Cummins from Queen to Ala Moana Boulevard, installing planted medians, installing sidewalks, and resurfacing pavement. Costs associated with these roadway improvements are shown in Table 2-11.

**Table 2-11 Roadway Improvement Costs**

<b>Roadway Improvement</b>	<b>Estimate</b>
Ala Moana Boulevard (widen 12'; planted median)	\$3,760,000
Piikoi Street (planted median)	\$1,240,000
Pensacola Street (planted median)	\$1,080,000
Queen Street	\$2,750,000
Halekauwila Street	\$2,930,000
Waimanu Street	\$1,820,000
Kawaiahao Street	\$1,490,000
Ilaniwai Street	\$ 640,000
Cummins Street	\$1,300,000
Kona Street	\$ 790,000
Hopaka Street	\$ 460,000
Alohi Way	\$ 450,000
Elm Street	\$ 450,000
Laula Way	\$ 270,000
Rycroft Street	\$ 450,000
Hoolai Street	\$ 450,000
Kamaile Street	\$ 450,000
Pohukaina Street (extension from Kamani to Auahi Street)	\$ 450,000
Ahui Street (extension from Pohukaina Street to Ala Moana Boulevard)	\$ 640,000
<b>Total</b>	<b>\$ 21,870,000</b>

Source: M&E Pacific, 2008

## 2.13 Implementation

The Draft Mauka Area Plan is a long-range plan that builds on HCDA's 25-year history of development and investment in the KCDD. The Draft Mauka Area Plan provides a framework for more detailed planning and investment decisions by landowners and government. While the Draft Mauka Area Plan looks forward to another 25 years, actual implementation will proceed incrementally in response to economic cycles and the availability of public funding. Implementation of the Mauka Area Plan shall be administered through the Mauka Area Rules.

### 2.13.1 Mauka Area Rules and Project Review

The Mauka Area Rules were established to implement the purposes and intent of the Mauka Area Plan, pursuant to Chapter 206E, HRS. The Mauka Area Plan and associated Rules serve as the basis for guiding public improvements and private development activities in the KCDD Mauka Area. Since the adoption of the KCDD Plan in 1982, HCDA has performed regulatory functions to ensure that any development occurring in the District meets the provisions of the Mauka Area Plan. The Mauka Area Plan includes specific requirements and restrictions relating to building height, density, building setbacks, front yards, open space, view corridors, streetscapes, landscaping, and urban design parameters. The Mauka Area Plan also contains schemes for transportation, open space, and recreation areas, public facilities, and infrastructure. The proposed key elements of the Draft Mauka Area Plans are:

- Definitions and standards for uses, build-to lines, building volumes and floor area, pedestrian and vehicular access, parking and loading, and accessory building components, such as signs, mechanical equipment and service areas;

- Design guidelines for the treatment of building facades for Street-front Elements and Mid-Height Elements;
- Standards and design guidelines for the provision of ground-level open space and arcades;
- Standards, design guidelines and review criteria and procedures for Tower Elements; and
- Standards and design guidelines for the review and approval of transitional uses.

The Mauka Area Rules will also include provisions for modification of standards by HCDA's Executive Director in limited circumstances. There will also be a provision for variances in cases of hardship, which will be referred to HCDA for decision. Implementation of the Mauka Area Plan is contingent upon economic cycles and the availability of funding.

## 2.14 Alternatives to the Project

### 2.14.1 Overview of Previously Developed Alternatives

For the preparation of the 1982 KCDD Plan, the HCDA directed its two consortia of consultants to use different guiding premises when preparing planning studies for Kakaako. Consortium 1 emphasized the existing and proposed County plans, policies, and ordinances, while Consortium 2 investigated opportunities and choices consistent with Chapter 206E, HRS, HCDA's Legislative mandate. To assure that the range of alternative futures for Kakaako was fully explored, Consortia 1 and 2 each prepared six plan variations. Then each consortium separately recommended a single plan to the HCDA incorporating what were felt to be the best features of the plan variations. Alternative 1 presented in the 1983 EIS is the Consortium 1 recommended plan.

Three plan variations prepared by Consortium 1 assumed plan implementation by HCDA, and three assumed no HCDA involvement. Development of the plan variation began at a time when the County was in the process of substantially revising land use plans and zoning for Kakaako. Therefore, Consortium 1 relied heavily on Resolution 77-504 which proposed land use and urban design policies that the Honolulu City Council wanted incorporated into future planning and zoning ordinances for Kakaako. The applicable Development Plan and Kakaako Special Design District (KSDD) ordinances actually adopted in 1981 are slightly different from Resolution 77-504 and most of the Consortium 1 plan variations. One of the Consortium 1 plan variations reflects development options under the KSDD Ordinance and was used as a basis for the No-Action Alternative.

Three of the plan variations proposed by Consortium 2 emphasized commercial and industrial activities, and three plan variations emphasized commercial and industrial activities. All of the plan variations assumed plan implementation by the HCDA, but some consideration was given to urban design concepts proposed in County zoning ordinances. Alternative 2 Plan is the Consortium 2 recommended plan.

Besides Alternatives 1 and 2, a No-Action Alternative, which defaulted redevelopment guidelines in accordance with then-existing County zoning and land use plans, was presented.

## 2.14.2 No-Action Alternative

The No-Action Alternative is a continuation of the existing Mauka Area Plan and Rules, which has not been revised since its adoption by the State in 1982. The existing Mauka Area Plan proposes the construction of a network of towers, pedestrian and park spaces atop building podiums 45 feet above the ground. Super block developments and Planned Developments with tower footprints of 16,000 square feet and 400 foot height limits would continue to be permitted with no required studies demonstrating the mass orientation, scale in comparison to adjoining uses, or view impacts at the street level or from distant locations. The roads would continue to be oriented for automobile use rather than designed with pedestrians and bicyclists in mind. Under the No-Action Alternative, the existing street, pedestrian, and building form would continue to evolve with no reference to their symbiotic relationship in creating a sustainable, pedestrian-oriented urban village.

## 2.14.3 Third Alternative Analysis

In response to comments received through the DSEIS comment period, a variation to the Draft Mauka Area Plan was assessed at the same level of analysis as Alternative 1 (No-Action, the existing Mauka Area Plan) and Alternative 2 (Draft Mauka Area Plan). The Third Alternative Analysis is detailed in Appendix B, UDA of the FSEIS. The third alternative analysis assessed four characteristics: density, building height, building envelope, and tower setback.

### Density

Recognizing new development opportunities and possibilities brought by parcel consolidation, density transfers to larger parcels are encouraged. Additionally, density bonus on TOD is also proposed to encourage high density developments.

### Building Height

Link building height of street front elements with street classification and neighborhood characters and differentiate residential uses and non-residential uses. Range of heights for mixed-use developments are proposed to be 40 feet (three story mixed-use and/or three story townhouse) to 65 feet (five story mixed-use and six story residential).

To implement effective development control on important view cones and visual corridors, as well as to provide additional development scale choices, view corridors were used as a tool. To preserve and enhance the views, the maximum height is largely defined by view cones and corridors from shoreline parks looking towards the Koolau Range. The building heights increase as the building site is situated further away from the waterfront. Building heights for mid-height element range from 160 to 250 feet.

Recognizing the roles of Ala Moana Boulevard as a major transportation corridor and scenic drive that showcases Kakaako's unique water frontline, Special Design Review Process Zone is proposed to guide development. Projects along Ala Moana Boulevard would be subject to discretionary design review in which visual access to the ocean, accommodation to pedestrian access to the waterfront and Kakaako Makai Area, and activity nodes and gateways at street corners would be assessed.

### Building Envelope

There is no footprint requirement for mid-height element aside from street-front element and height setback requirements, 50 feet from promenade streets and 20 feet from non-promenade streets, respectively. The exception applies to mid-height elements proposed in the Special Review Process Zone along Ala Moana Boulevard. The heights and the size of floor plates for tower elements correspond to lot sizes. Under the third alternative analysis, lots smaller than 40,000 square feet may have a floor plate size no greater than 8,000 square feet; the range extends to a floor plate of 16,000 square feet for lots measuring in excess of 160,000 square feet. The orientation of towers is Mauka-Makai; for developments parcels with a maximum floor plate of 16,000 square feet, the width to length ratio must not exceed 1:4 for residential development and 1:2 for commercial development.

A detailed analysis of three alternatives is provided in Appendix B, UDA of the FSEIS.

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# Chapter 3

## Affected Environment, Potential Impacts, and Mitigation Measures





## 3.0 AFFECTED ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION MEASURES

This chapter describes the existing natural and human environments within, and surrounding the Mauka Area. It assesses potential impacts that may result from the Draft Mauka Area Plan and proposes mitigation measures as needed. Construction related environmental impacts and mitigation measures addressed in the EIS accepted in 1983 are still largely applicable.

### 3.1 Climate

Honolulu's climate and that of the Mauka Area are typical of the leeward coastal lowlands characterized by mild temperatures, abundant sunshine, infrequent severe storms, moderated humidity, and persistent north easterly trade winds. For most of Hawaii there are two seasons, summer from May to October and winter from October to April. The warmest month is in August with an average a high of 89° Fahrenheit (°F) and a low of 75°F, while the coldest month is February with a high of 81°F and a low of 65°F. Typically rainfall occurs between the months of November and April however, varies from year to year; the mean annual rainfall is approximately 23 inches. The relative humidity ranges between 56 and 72 percent. Typically prevailing trade winds are from the northeast through out most of the year. However, the occasional Kona winds bring warm humid air from the south.

#### 3.1.1 Affected Environment

Located in an urbanized environment, the Mauka Area microclimate varies somewhat from the overall climate of the region. The core of the Mauka Area with its abundance of brick, concrete, and asphalt surfaces tend to absorb the solar energy, heat up, and re-radiate that heat to the ambient air resulting in slight temperature differences.

#### 3.1.2 Potential Impacts and Mitigation Measures

Given that the Mauka Area is already a highly urbanized area, ongoing and future development/redevelopment efforts would not be anticipated to have a negative impact on the Mauka Area climate, therefore mitigation measures are not proposed.

### 3.2 Topography, Geology, and Soils

#### 3.2.1 Affected Environment

##### Topography

The Mauka Area terrain is relatively flat, averaging five feet above mean sea level (MSL) and gently slopes toward the coastline from north to south. There are no notable topographical features in the project area.

## Geology

The Kakaako geologic substratum consists of emerged fossil reef and sedimentary deposits that were formed 120,000 years ago (MacDonald & Abbott, 1970). Over time, massive coral reefs were formed during high stands in the sea and later eroded by coastal streams during low stands. These fluctuations in sea level are illustrated in Figure 3-1, which displays the limits of the former shoreline. Sub-surface coral elevations displayed in Figure 3-1, illustrate how the area has developed over time. The northern boundary of the Mauka Area is five feet above MSL near King Street and the area south of the Mauka Area is 25 feet below MSL near Ala Moana Boulevard. Stream channel that once ran parallel to Kapiolani Boulevard between South Street and Kamakee Street is also illustrated in Figure 3-1. Today the major buried channel is filled with soft alluvium to depths of 40 feet to over 180 feet (HCDA & HUD, 1985).

Much of the Mauka Area was reclaimed with soils composed of soft mixtures of sand, silt and clay which extend from the top of the sub-surface coral layer to about sea level (HCDA & HUD, 1983). The limit of the reclaimed area is illustrated in Figure 3-1. About 67,000 years ago the area known as, Round Top and Tantalus erupted, leaving deposits of black sand and cinder mainly to the north of the reclaimed area; test borings in the reclaimed area randomly encountered black sand and cinders (HCDA & HUD, 1985). Over the last century the submerged lands and low swamp lands have been filled with dredged coral to the existing elevations of four to five feet above MSL.

## Soils

As illustrated in Figure 3-2 and according to the U.S. Department of Agriculture's soil survey, Mauka Area soils are classified by the following three soil types (NRCS, 2008):

- Mixed Fill (FL) is typically used for urban development and described as “material dredged from the ocean or hauled from nearby areas, garbage, and general material from other sources”.
- Makiki Clay Loam (MKA) is described as zero to two percent slope, dark brown clay loam, 20-inch thick, subsoil 10-inch thick, dark brown clay loam that has sub-angular block structure. It contains cinders and rock fragments. Under subsoil 24-inch thick, similar material below this is volcanic cinder.
- Ewa Silty Clay Loam (EmA) is described as moderately shallow, zero to two percent slope. Depth to coral limestone is 20 to 50 inches.

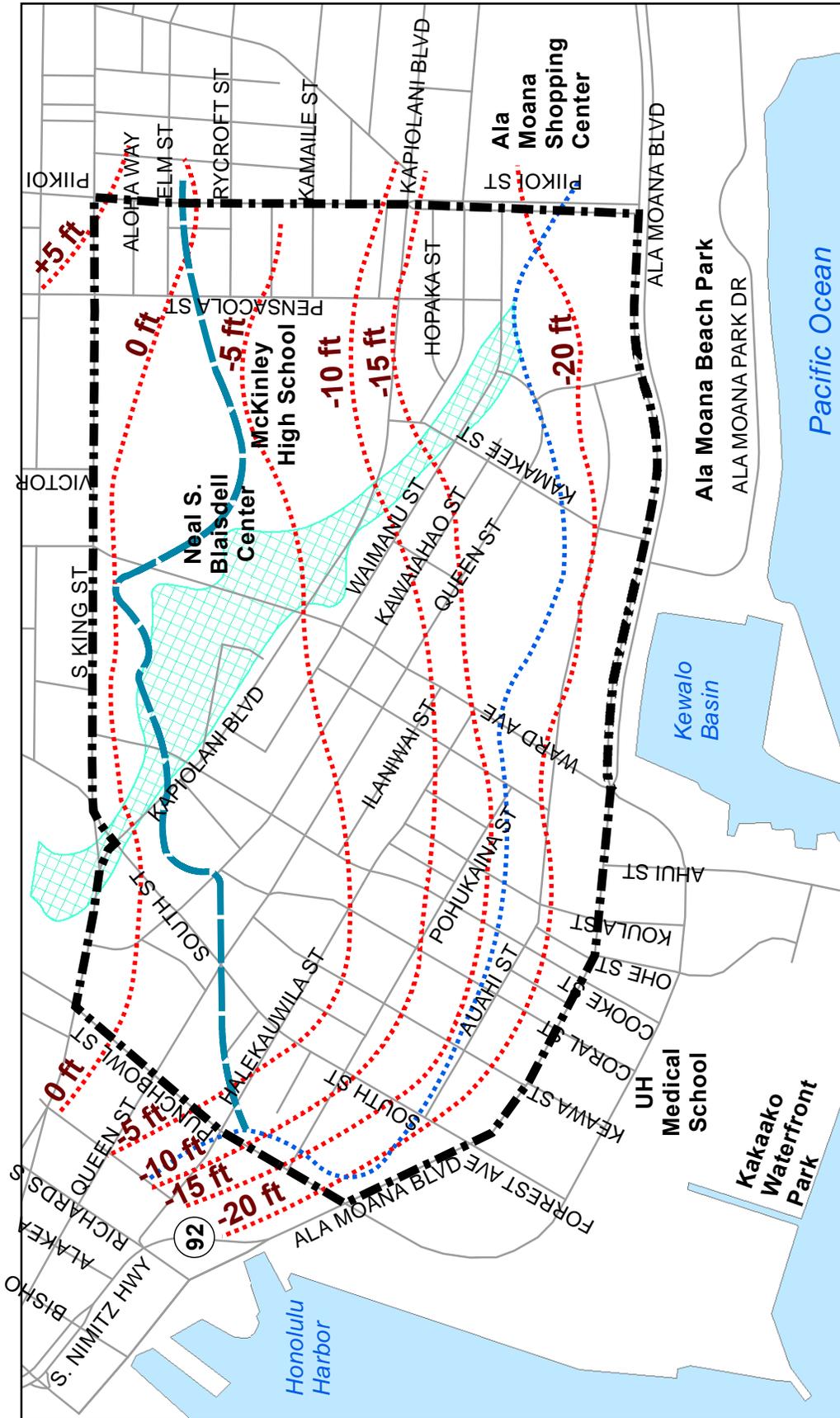


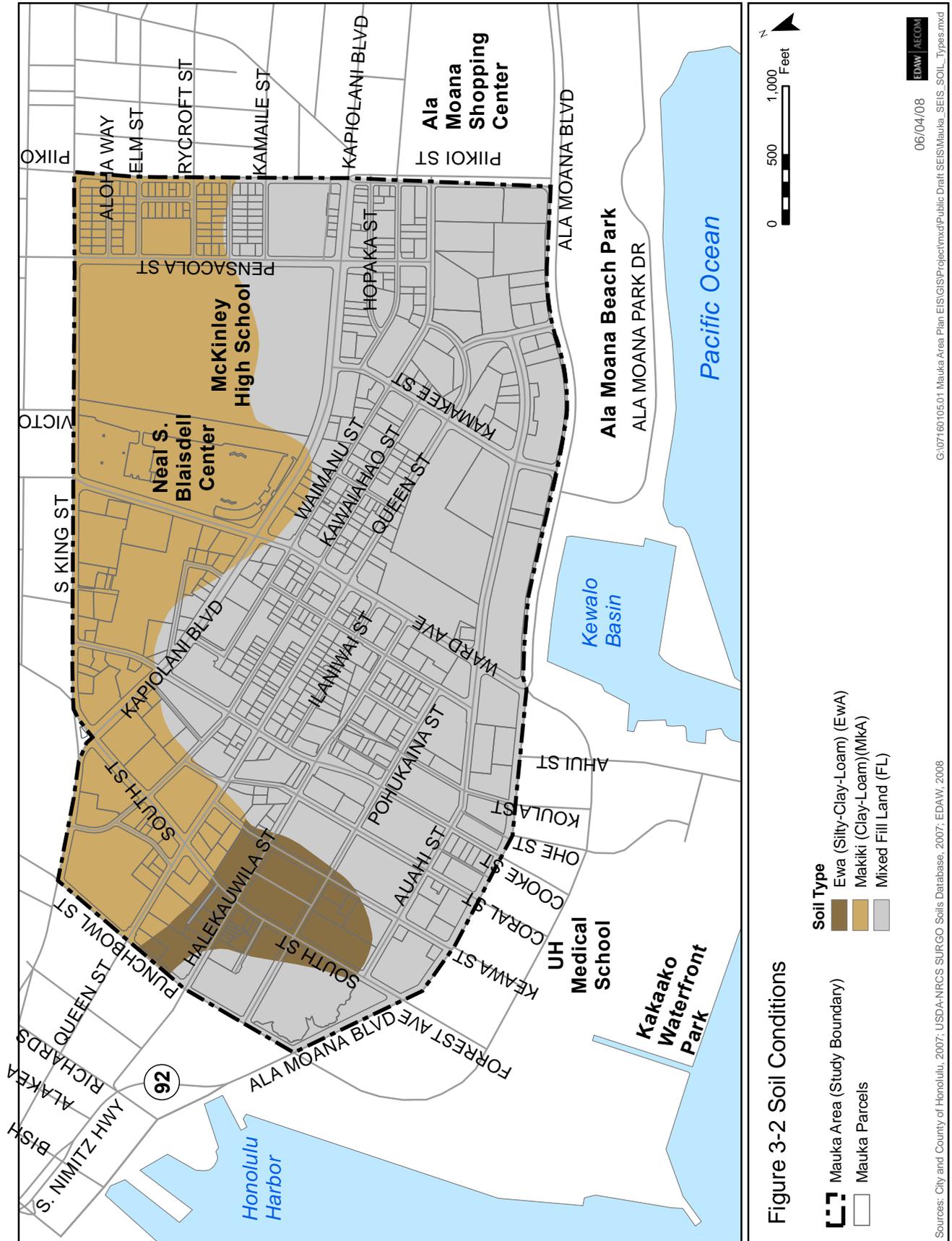
Figure 3-1 Coral Subsurface Elevations

- Mauka Study Area
- Limit of Reclaimed Area
- Limit of Former Shoreline
- Alluvial Channel
- Contours of Coral Subsurface

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SOURCE: HCDA & HUD, "FSEIS for the Kakaako Community Development District Plan," Pg III-3, 1983, EDAW, 2008



The existing Mauka Area Plan included an analysis of the substrata conditions of the project area for development purposes. A map of the substrata conditions is illustrated in Figure 3-3 indicating that a majority of the Mauka Area substrata are rated as Poor. While the remainder of the areas to the east, northeast and northwest are rated Average and/or Good. Table 3-1 further describes the Poor and Average qualities as they relate to development potential.

**Table 3-1 Substrata Conditions of Concern**

<b>Rating</b>	<b>Development Projections</b>
Average	Projected to support structures up to 22 feet without special foundations. The structures would be relatively light with continuous lightly loaded individual spread foundations with spans of less than 20 feet.
Poor	Projected to only support lightly loaded single-story structures not sensitive to vertical movement, unless special foundations are developed to support larger structures.

Sources: HCDA & HUD, 1985; Ernest Hirata and Associate, Inc., 1979.

### 3.2.2 Potential Impacts and Mitigation Measures

Soils within the project area would experience disruption as a result of construction activities from pile driving, drilling, and excavations as a part of future development projects. Impacts are expected to be localized and would be fully mitigated on a case-by-case basis following the appropriate BMP. Developments proposed within areas defined as Poor would be subject to further geotechnical analysis to assess the need for adequate foundation support systems. Incorporating BMPs and implementing the results of project related geotechnical studies into future development/redevelopment efforts would alleviate any potentially negative effects on the topography, geology, and soils of the area.

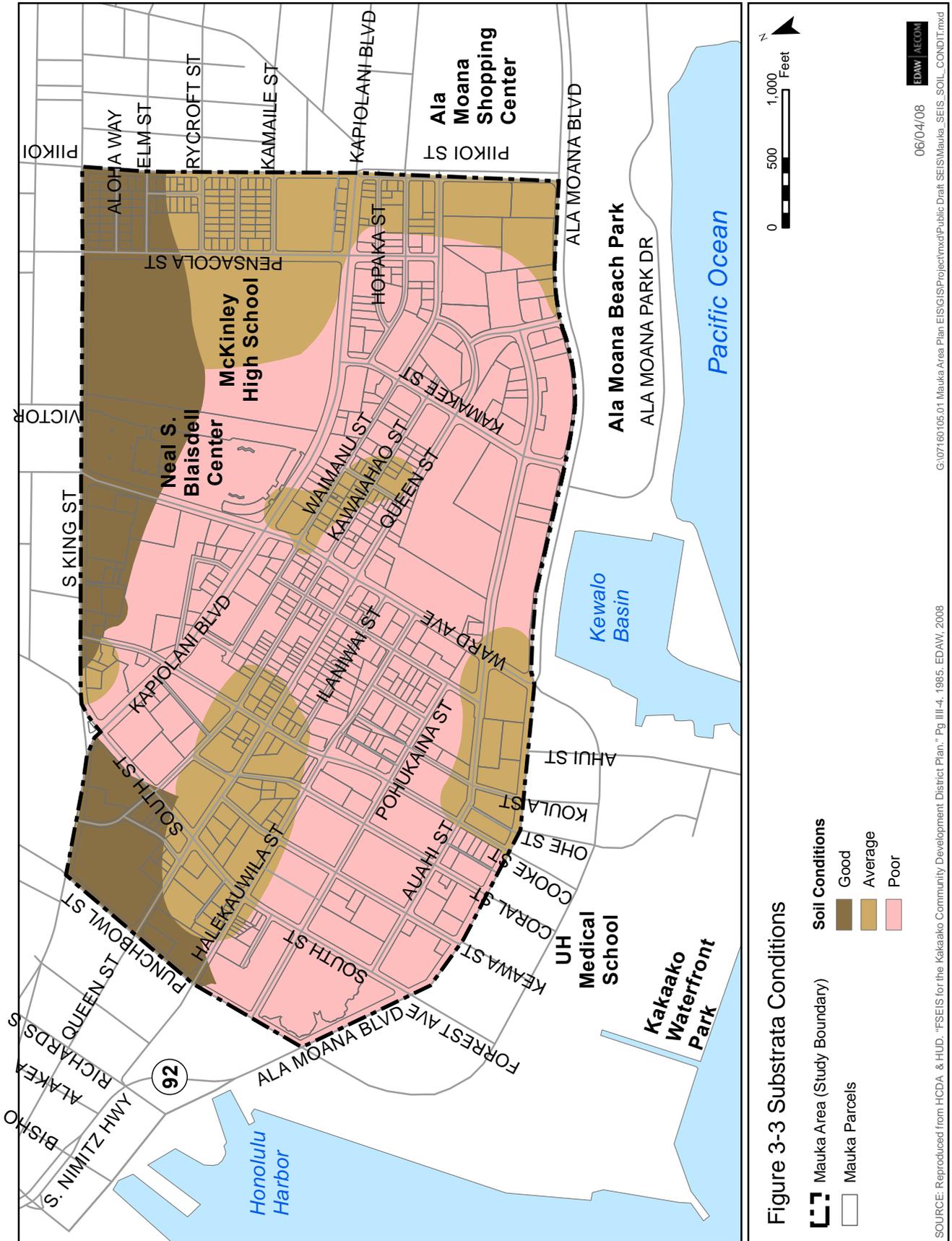
## 3.3 Fauna and Flora

### 3.3.1 Affected Environment

The Mauka Area is a highly modified urban environment with no significant naturally occurring vegetation. Landscaping accounts for most vegetation in the area. Fauna is limited to birds and mammals that have adapted to the urban environment. There are no endangered or threatened species and no critical habitats within the Mauka Area.

### 3.3.2 Potential Impacts and Mitigation Measures

Ongoing and future development/redevelopment efforts would not have an adverse impact on the flora and fauna in the Mauka Area, therefore mitigation measures are not proposed.



## 3.4 Natural Hazards

### 3.4.1 Affected Environment

#### Flood and Tsunami

As indicated by the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) approximately one-third of the south-east part of the Mauka Area is located within Zone A, a small portion adjacent to Kewalo Basin is designated AE, and the remainder is in Zone X (Figure 3-4).

The 100-year flood plain has one percent chance of being flooded in any given year and a 26 percent chance of flooding during a 30-year period. Zones A and AE are special flood hazard areas and are each variations of the 100-year flood plain. Zone A, may be inundated by the 100 year flood, but no base flood elevations have been determined. Zone AE is similar to Zone A, but base flood elevations are determined at four feet above MSL.

According to the Oahu Civil Defense Agency (CDA) Tsunami Inundation Map for Oahu, the Mauka Area is outside of the tsunami inundation zone. Nevertheless, in anticipation of future natural disasters, the Oahu CDA has identified two emergency shelters in the Mauka Area (Figure 3-4).

#### Seismic

Oahu is in Seismic Zone 2A, which is characterized as being susceptible to earthquakes that may cause minor damage to structures. Zone 2A is based on the International Building Code (IBC), which contain six seismic zones, ranging from 0 (no chance of severe ground shaking) to 4 (10 percent chance of severe shaking in a 50-year interval); Zone 2 is subdivided into two zones that correspond numerically to the effective horizontal peak bedrock acceleration (or equivalent velocity) that is estimated as a component of the design base shear calculation. Seismic Zone 2A has a Z-factor (seismic zone factor) of 0.15 and is not associated with a particular fault zone. Seismic Zone 2B has a factor of 0.20 and indicates an association with known crustal faults (DLNR, 2008).

### 3.4.2 Potential Impacts and Mitigation Measures

#### Flood and Tsunami

Potential flooding could occur within the 100-year flood plain from flash floods or storm surges, or from a tsunami. The destruction potential of a tsunami depends mostly on the wave run-up height and the inundations of the shores. Twenty-six tsunamis with flood elevations greater than 3.3 feet have made landfall in the Hawaiian Islands during recorded history, and ten of these had significant damaging effects on Oahu (City and County of Honolulu, 2003). Although the threat of a tsunami always exists as their frequency and intensity are unpredictable, all parts of the Mauka Area are already above the 100-year floodplain. Regardless, all developments within the project area would comply with procedural and flood-proofing requirements of the City and County of Honolulu.

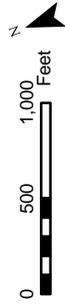
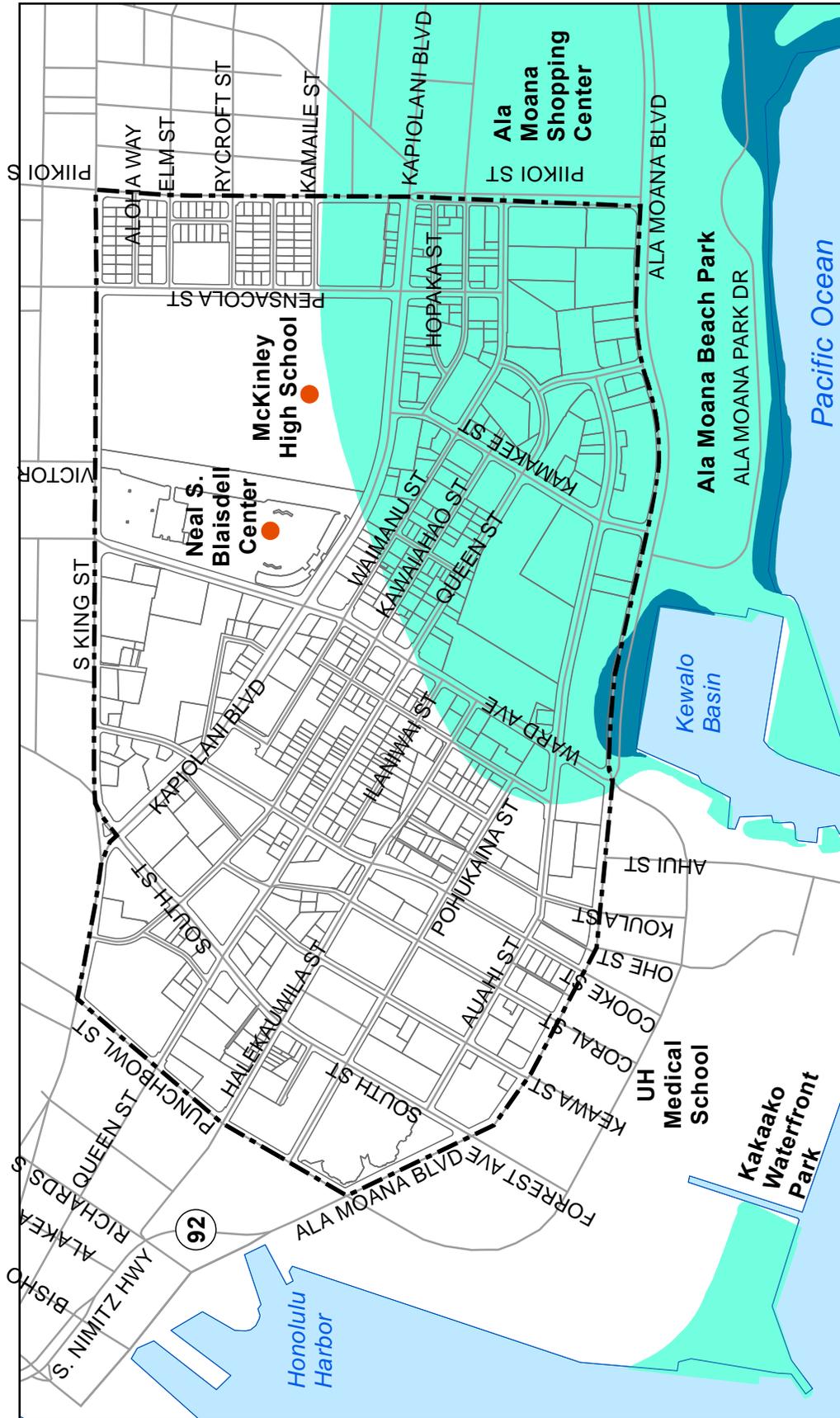


Figure 3-4 Flood Map

- Mauka Area (Study Boundary)
- Mauka Parcels
- Emergency Shelter\*
- Shoreline Boundary
- FEMA Flood Zones**
- (A) 100 YR Floodplain - no base elevations or depths
- (AE) 100 YR Floodplain - with base elevation at selected intervals

\* The Neal S. Blaisdell Center is a Hurricane Shelter and McKinley High School is a Tsunami Shelter

Sources: City and County of Honolulu, 2007; PlanPacific, 2007; EMA, 2005; ED, 2008  
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Damage from flash flooding or storm surges would be minimized by following Oahu CDA evacuation procedures. Emergency shelters are indicated on Figure 3-4. All developments within the 100-year flood plain would be expected to comply with procedural and flood-proofing requirements as required by City and County flood hazard ordinances flood Zones A and AE must comply with the rules and regulations of the National Flood insurance Program. In addition, all construction would be required to comply with all Federal and State programs, procedures, and requirements. Therefore, it is anticipated that implementation of the mandatory measures would have a minimal adverse impact on the Mauka Area.

### Seismic

Oahu is not considered to have a high earthquake risk. Previous studies indicate that Oahu is not subject to volcanic eruptions or significant earthquakes. Historically, no major earthquakes have been centered on Oahu; however, the Mauka Area is close enough to the seismically active island of Hawaii to be affected by earthquakes that originate there. The risk of earthquakes, while small, would be expected to have minimal adverse impacts on the Mauka Area; however, all structures within the Mauka Area should be designed to meet seismic requirements as prescribed by the City and County of Honolulu.

## 3.5 Archaeological and Historic Resources

### 3.5.1 Affected Environment

#### Archaeological Resources

The Kakaako Mauka Area is within the *ahupuaa* (land division) of Honolulu, and encompasses several smaller traditional Hawaiian land divisions within an *ahupuaa*, including Kakaako, Kaakaukui, Kukuluao, along the shore (west to east), and Kewalo, *mauka* (inland) of the three coastal land areas. Thus, the modern area known as Kakaako is larger than the traditional Hawaiian Kakaako and now encompasses several other land areas whose names are no longer used.

During the pre-contact period, this area was a place of recreation, particularly along the shoreline. The waters were used for cleansing, fishing, canoe landings, and religious practices. These activities are noted by Cultural Surveys of Hawaii (CSH), which has performed several archaeological studies in the present day Mauka Area. Kewalo had a famous fishpond, which was used to drown *kauwa* (slaves) or *kapu* (taboo) breakers as the first step in a sacrificial ritual known as *Kanawai Kaihehee* (Kamakau, 1991) or *Ke-kai-heehee* (sea sliding along), signifying the victims were slid under the sea (Westervelt, 1963). Some of these individuals were then taken up to Punchbowl to be offered as sacrifices (Honolulu Star Bulletin, 3 August 2007)."

Kakaako is relatively rich in the remains of nineteenth century Honolulu, of pre-contact Hawaiian life, and of the ethnic influx from the late 1800s until 1940. The *alii* (high status class) and the commoners lived along the beach from the pre-contact area to the early historic period. The chance of the presence of both high and low status burials associated with residences in beach areas is believed to be high.

In the nineteenth century, Kakaako was considered to be outside the bounds of Honolulu town, and thus an appropriate place for quarantine and burial. There were many epidemics in the nineteenth century, which, along with other factors, reduced the Hawaiian population from about 300,000 (other estimates vary from 100,000 to 1 million) at contact in the year 1778 to only 71,019 native Hawaiians by the end of the nineteenth century, as counted in the census of 1896. The most devastating of these crises was the 1853 smallpox epidemic, which resulted in 5,748 deaths in a population of about 70,000 in the entire archipelago, and a population of about 20,000 on Oahu (discussed in O'Hare et al., 2006). The high number of victims resulted in many being buried in shallow graves throughout the area. Others were buried at specific cemeteries in Kakaako, such as at Kaakaukui Cemetery, which was utilized from the 1700s to the early 1800s and the Kawaiahao Cemetery, used from about 1875 to 1920. One of the more significant archaeological deposits, and therefore, assigned the highest priority, is the 1853 Honuakaha Cemetery, utilized only from 1853 to 1854 during the smallpox epidemic. It is located at South Street and Quinn Lane, and more than 1000 burials were interred at this site. The 2002 report by Bush and Hammatt asserts that burials will continue to be found throughout Kakaako. Some may have been buried in sand remnants, others intruding into the pumice deposited from ancient Punchbowl eruptions. Most will be pre-contact or early historic. According to the same report, as in the case of the Kaakaukui Cemetery, deaths from pre- and post-1853 endemics resulted in many burials throughout Kakaako.

Kakaako became a focus of archaeological work during the 1980s as a result of construction of local and federal government buildings and state-planned redevelopments (Bush and Hammatt, 2002). A 1987 report titled "Kakaako: Prediction of Sub-surface Archaeological Resources, Detailing Archival Research and Archaeological Assessment of the Kakaako Community Development District" (Griffin et al., 1987), provided background information and summarized the historical importance of the area.

In the Kakaako Mauka Area between Punchbowl Street and Piikoi Street, there are four large historically documented cemeteries; Kaakaukui Cemetery (-2918; eight burials recorded), utilized from the 1700s to the early 1800s; the Honuakaha Smallpox Cemetery (-3712; 56 burials recorded), used from 1853-1854; Kawaiahao Cemetery (-4534; 129 burials recorded), used from 1875-1920; and, the King Street Roman Catholic Cemetery (-5455; 33 burials recorded), used from the mid-1800s to the 1920s. The full extent of these cemeteries has not been excavated, and there are probably hundreds of burials still within these cemeteries within the modern cemetery boundaries or under modern structures and modern road alignments.

There is also a cluster of at least 28 historic coffin burials at the Kakaako ID 10 area (-6658), a cluster of 16 coffin burials at the Koolani Condominium project area (-6911), two coffin burials at the Kakaako ID-4 area (-5598), and two historic burials (one coffin and one with historic grave goods) at the Kakaako ID-3 area (-5280). There is no historic documentation on these small burial areas and their extent and time of use is not fully known. Thus a total of 274 historic burials have been recorded in some way (recorded in situ or disinterred) in the Kakaako Mauka Area.

The remaining ~~66~~ 130 burials found (~~number does not include~~ including burials found at the Victoria Ward Village Shops project area ~~where work is still in progress~~) in the Kakaako Mauka Area were not buried in coffins, or do not have associated historic grave goods, or consist of

partial, previously disturbed, burials. Some skeletons were found in a traditional flexed position, suggesting a traditional Hawaiian burial practice. These may date to the pre-contact period or the early post-contact period (before the mid-19th century), when most Hawaiians adopted Western style burial practices (usually extended within a coffin). Many of these burials can not be assigned to a specific time period.

Also found within the Kakaako Mauka area are wetland/fishpond deposits (-6636 and -6856), and historic deposits/ trash pits (-1973, -3984, -6637, -6639, -6641, -6660, -6766, -9917, and -9991), which usually date around the last decades of the 19th to the early decades of the 20th century.

In summary, no major pre-contact habitation areas have been found in the Kakaako area. It appears, based on the results of previous archaeological work, that all or most of the permanent habitation sites were located farther inland. Post-contact habitation refuse and fill layers are found throughout the area. Several refuse dumps have been dated to the late nineteenth and early twentieth century, when the expansion of street construction east of the main Honolulu area brought in businesses and large number of occupants, some who lived in separate ethnic enclaves, into the area. Based on the archaeology reports, it appears that most pre-contact human burials in the Kakaako area that have been encountered were buried in sandy deposits. The majority have been identified as probably of Hawaiian ethnicity, buried in the post-contact period from the eighteenth to the twentieth centuries.

#### Historic Resources

Kakaako is a highly urbanized and with a mix of low, mid and high rise structures. There are no structures in the Mauka Area that predate or reflect the style of construction prior to western contact with native Hawaiians in 1778. A few remaining buildings were built by or inspired by nineteenth century missionaries, however, most buildings in Kakaako were built during the twentieth century after Hawaii became a U.S. territory. In consultation with the SHPD, HCDA conducted an inventory to identify structures built prior to 1941 to determine which properties in Kakaako were eligible for the National Register of Historic Places (NRHP). The Chapter 206E, HRS requires that sites of historic or cultural significance within the Mauka Area must be preserved.

To preserve Kakaako's historic resources, the Draft Mauka Area Plan calls for protection of buildings which are historically significant, in productive use, and economically self-sustaining. Based on these criteria, HCDA specifically designated the eight properties listed in Table 3-2 to be protected by the Draft Mauka Area Plan (Figure 3-5). Of these, five properties are listed in the NRHP and six are listed in the HRHP. Properties listed in both Registers include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service (NPS), which is part of the U.S. Department of the Interior, while DLNR manages the HRHP.

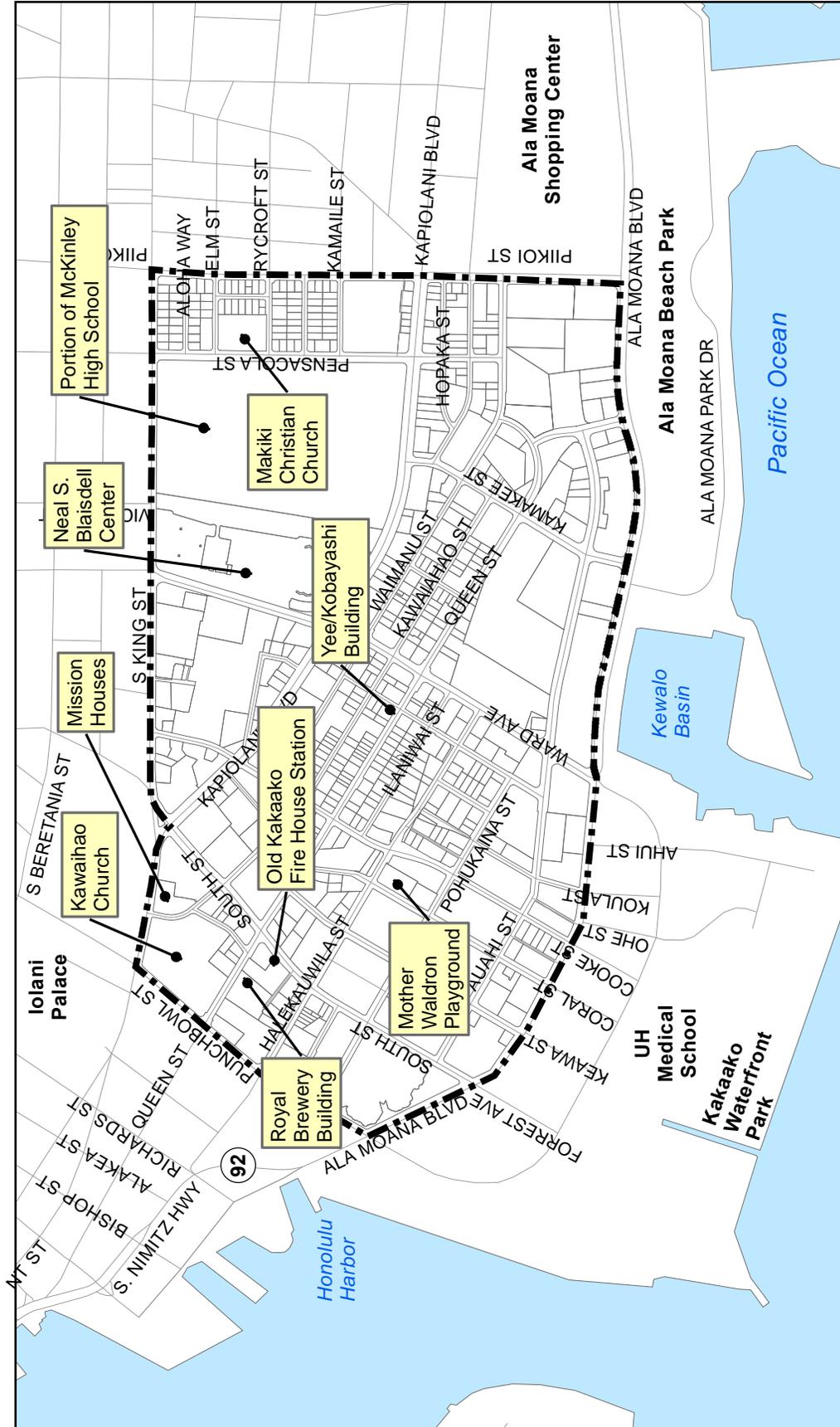


Figure 3.5 Historic Properties in the Mauka Area

-  Mauka Area (Study Boundary)
-  Mauka Parcels
-  Historic Property Locations

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Sources: State of Hawaii, City & County of Honolulu, EDAW

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**Table 3-2 Properties to be Protected in the Mauka Area**

Historic Site	Proposed Action <sup>1</sup>	National Register	Hawaii Register	SIHP <sup>2</sup>
Kawaiahao Church and Grounds	Preservation	Yes	Yes	50-80-14-9991
Mission Houses	Preservation	Yes	Yes	50-80-14-9991
Old Kakaako Fire Station	Rehabilitation	Yes	Yes	50-80-14-1346
Mother Waldron <u>Neighborhood Park Playground</u>	Preservation	No	Yes	50-80-14-1388
McKinley High School	Rehabilitation	Yes	No	50-80-14-9926
Makiki Christian Church	Preservation	No	Yes	50-80-14-9719
Yee / Kobayashi Store	Restoration	No	Yes	50-80-14-9739
Royal Brewery Building	Preservation	Yes	No	50-80-14-9917

Source: Kakaako Community Development District Plan and Rules, 1982.

Notes: <sup>1</sup> Preservation means keeping a property in its present condition.

Rehabilitation means returning a property to a useful state while preserving significant features.

Restoration means accurately renovating or replacing the original form and details of historic structures.

<sup>2</sup> SIHP (State Inventory of Historic Places) site designation (50=Hawaii, 80=O'ahu, 14=Honolulu Quad)

Properties listed in the HRHP or NRHP are afforded the same protection by HCDA as those sites included in the Draft Mauka Area Plan. HCDA requires property owners to obtain a certificate of appropriateness from HCDA before demolishing, altering, or improving any of the aforementioned historic properties. HCDA must grant an application for a certificate of appropriateness if: (1) the proposed action will not hinder the protection and use of the historic property; (2) the property as it exists is totally inadequate for the owner and/or lessee's legitimate needs; or (3) the owner or lessee is unable to earn a reasonable return unless the proposed project is undertaken. The Draft Mauka Area Plan also recommends that HCDA provide grants-in-aid and/or suggest alternatives to proposed projects to encourage property owners to protect historic properties. HCDA may also acquire the property by eminent domain.

In situations where a federal action may impact a historic site listed or eligible for listing on the NRHP, a Determination of Effect must be made. The regulations of the Advisory Council on Historic Preservation [ACHP (36 Code of Federal Regulations (CFR) Part 800)] indicate the procedures that federal agencies must follow to comply with the National Historic Preservation Act (NHPA) of 1966. No federal agency can undertake, fund, issue permits for, or provide loan guarantees to any project which will adversely affect a property eligible for the NRHP without consent of the ACHP in a Memorandum of Agreement (MOA).

At present, there are no specific proposals for federal involvement in the financing or insurance of public or private involvement in the Mauka Area. As such, there are no known federally assisted undertakings that will have an adverse effect on properties that are eligible for the NRHP. To ensure compliance with Section 106 of the NHPA, a supplemental determination of effect will be made by the U.S. Department of Housing and Urban Development (HUD) whenever there is a specific proposal to use HUD mortgage insurance, assisted housing programs, or community development block grant funds to implement activities that may affect any property in the Mauka Area which is eligible for the NRHP. An MOA with the SHPD and the ACHP are required pursuant to 36 CFR Part 800 prior to implementation of federally assisted undertakings that would adversely affect historic properties.

## 3.5.2 Potential Impacts and Mitigation Measures

### Archaeological Resources

Ongoing and future development / redevelopment efforts resulting in excavation may result in the destruction or permanent burial of essentially all of the cultural remains encountered. For at least two thousand years, native Hawaiians have placed the earthly remains and spirits of their *kupuna* (ancestors), within the landscapes of Hawaii. When a departing *kupuna* was laid to rest it was their belief that his remains would empower their descendants until they themselves were buried. The SHPD has specific procedures and protocol that must be followed in the event that iwi and / or artifacts are uncovered.

~~HCDA will encourage potential developers in the Kakaako Mauka Area to consult with the SHPD before preparing any development plans to familiarize themselves with the archaeological and cultural issues relating to the Mauka Area.~~ HCDA has implemented a requirement that all developers and applicants consult with SHPD prior to submission of any plans for project eligibility. A written letter of concurrence from the SHPD will be required prior to acceptance of an application for project eligibility review. This policy has already been implemented for projects within the Mauka Area. In addition, HCDA proposes to formalize the SHPD review process in the Mauka Area Rules, pursuant to Chapter 91, HRS.

If any archaeological features are found during construction activities, all work must cease immediately and await SHPD's determination on how to proceed. Additional site-specific archaeological surveys may be required for any improvements that may be undertaken outside of the vicinity of a project area. The proper treatment of disinterred iwi and artifacts is vital to ensure research and studies related to the site are not inhibited by development activities. In all cases, treatments of any remains or artifacts would be in accordance with procedures required by the Oahu Island Burial Council (IBC) and the SHPD.

### Historic Resources

Historic sites listed in the Mauka Area Plan are already listed on the HRHP and in some cases, in the NHRP, and are protected by HCDA permit requirements. Provisions in the Draft Mauka Area Plan supplement, but do not replace other Federal and State programs, procedures, and requirements for historic preservation. Therefore, no adverse impacts are anticipated as a result of the revised plan; consequently, no mitigation measures are proposed.

## 3.6 Cultural Practices and Traditions

### 3.6.1 Affected Environment

According to a Cultural Impact Assessment performed by the CSH for the Draft Mauka Area Plan in 2008, portions of Kakaako and Kewalo, were a part of a 125-acre land awarded to Victoria Kamamalu in the Great *Mahele* ("divide") of 1848. Kakaako / Kewalo is situated between Kou, which is an area encompassing present-day downtown Honolulu to the Honolulu Harbor, and Waikiki, both of which were densely populated centers of activities. Waikiki and Kou rendered themselves as sustainable, thriving communities where taro *loi* (irrigated fields)

spanned across the plains, sustained with water flowing from Makiki, Manoa, and Palolo valleys and Nuuanu and Pauoa valleys, respectively. An “Archaeological Monitoring Plan for Kakaako Community Development District” performed for the ID Program 10 (Bush and Hammatt, 2002) states that the Waikiki *ahupuaa* gained even more prominence as the place of residence for King Kamehameha I after he wrested control over the islands by defeating Oahu’s chief, Kalanikupule (Bush and Hammatt, 2002).

Captain Jacobus Boelen, a visitor to Honolulu in the 1820s, described Kewalo during his visit:

“... on its southern side is the harbor or the basin of that name. The landlocked side in the northwest consists mostly of *tarro* fields. More to the north there are some sugar plantations and a sugar mill... from the north toward the east... the soil around the village is less fertile, or at least not greatly cultivated” (Boelen 1988).

In addition to being comparatively less fertile than the adjoining Kou and Waikiki, an 1817 map by Commander Otto von Kotzebue of the Russian ship *Rurick*, showed a cemetery as the only specifically identified feature in the entire Kakaako / Kewalo area. Kotzebue’s map suggests that perhaps Kakaako / Kewalo formed a “break” between the heavily populated and cultivated centers of Honolulu and Waikiki. Compared to the two centers, the subject area contained fishponds, trails connecting Honolulu (Kou) and Waikiki, and occasional taro *loi* and habitation sites. Furthermore, east of Punchbowl Street was described as a “barren and dusty plain” by Gorman D. Gilman, a settler during the early 1840s (Gilman, 1903).

During the Great Mahele of 1848, King Kamehameha III, who inherited from his brother control of all the lands of the kingdom, made it possible for his chiefs and people to own land. The Great Mahele provided for the people the ability to own and receive titles to the land (*kuleana*) they worked on. Some of the recorded testimonies related to individual *kuleana* awards reveal that many of the occupied lots were characterized as being on salt plains, *loko* (fish ponds), and *kalo* (taro) patches (O’Hare et al. 2006). These Land Commission Awards (LCA) help to clarify that during the pre-contact period, Kewalo region and its surroundings may have been used for salt making and fishpond farming activities, with minimal wetland agriculture. The same report concluded that, as a result of having conducted several archaeological monitoring reports in the Kakaako Area, “no major pre-contact habitation areas have been found” in the Kakaako area, suggesting, instead, that “all or most” of the permanent habitation sites were located farther inland. For its residents, Kakaako boasted sandy beaches along the shore where canoe rowing and catching surf breaks were common.

In the mid-1800s, Kakaako became a congested center of Hawaiian homes. The area began to be occupied by Japanese fishermen employed by the MacFarland Tuna Company who began to take residence in the area in 1907. Later, other ethnic groups moved into the area, usually in ethnic enclaves. In the 1880s, as commercial and residential uses started to replace the fishponds, salt production and other less intensive activities, the areas of mud flats and marshes were filled in and the shoreline extended. Most of the filling was done privately on a small scale and, for larger sections, the government assessed property owners for the cost. The first areas to be filled, were generally closer to downtown Honolulu, moving in the easterly direction into the Kakaako district. During the 1800s, Kakaako was deemed a suitable place for cemeteries and burial grounds, as well as for quarantining casualties of pestilential diseases. Those inflicted with Hansen’s disease were quarantined in Kakaako as well. When the Honolulu Iron Works

Company moved to Kakaako around 1900, more native Hawaiians moved to Kakaako, attracted to the area's low rent and convenient location.

The present day Kakaako Mauka Area is an urban center in Honolulu that is composed of mixed land uses. The previously mentioned practices of producing sustenance by means of cultivating salt plains, fish ponds, and taro *loi* appear to have diminished and then stopped altogether as the result of the area being urbanized beginning in the mid-1800s. The Mauka Area today is characterized largely as an urban core with healthy commercial and light industrial activities, as well as increasing growth of residential condominium constructions and affordable housing. The traditional recreation activities of canoe rowing, catching surf breaks, and playing along the sandy beaches continue in the parts of Kakaako, such as Ala Moana Beach Park and Kakaako Waterfront Park, where residents of Kakaako and non-residents alike, as well as visitors enjoy the shoreline.

### 3.6.2 Potential Impacts and Mitigation Measures

The existing Mauka Area is heavily urbanized and most, if not all, of the activities characteristic of the pre-contact Kakaako/Kewalo region have ceased to continue. The Draft Mauka Plan and Rules is a set of development guidelines, which, if adopted, would neither erode nor revive the activities that are no longer in use at the present time. As such, the Draft Mauka Area Plan is not expected to cause any negative impacts to the identified cultural resources within the region, therefore, no mitigation measures are proposed.

## 3.7 Traffic

### 3.7.1 Affected Environment

#### Intersection Operating Conditions

Intersection operations were analyzed using the Level of Service (LOS) methodology, a qualitative description of the performance of an intersection based on the average delay per vehicle. Intersection levels of service range from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. Most large cities consider LOS A through LOS E acceptable and LOS F unacceptable in urban areas or central business district (CBD) such as the Mauka Area. The LOS methodology is summarized in Table 3-4.

**Table 3-4 Intersection LOS Methodology**

LOS	Description	Delay (seconds/vehicle)	
		Signalized Intersections	Unsignalized Intersections
A	Little or no delay	< 10.0	< 10.0
B	Short traffic delay	> 10.0 and < 20.0	> 10.0 and < 15.0
C	Average traffic delay	> 20.0 and < 35.0	> 15.0 and < 25.0
D	Long traffic delay	> 35.0 and < 55.0	> 25.0 and < 35.0
		Signalized Intersections	Unsignalized Intersections
E	Very long traffic delay	> 55.0 and < 80.0	> 35.0 and < 50.0
F	Extreme traffic delay	> 80.0	> 50.0

Source: *Highway Capacity Manual, Transportation Research Board, 2000.*

AM and PM peak hour intersection LOS was analyzed for 33 key intersections within the plan area. These intersections are listed below and are shown in Figure 3-6, Figures 3.-7, and 3-8 illustrate AM and PM Peak Hour LOS, respectively.

1. Kapiolani Boulevard / South Street / King Street (signalized);
2. Kapiolani Boulevard / Ward Avenue (signalized);
3. Kapiolani Boulevard / Kamakee Street (signalized);
4. Kapiolani Boulevard / Pensacola Street (signalized);
5. Kapiolani Boulevard / Piikoi Street (signalized);
6. Ala Moana Boulevard / South Street (signalized);
7. Ala Moana Boulevard / Keawe Street (signalized);
8. Ala Moana Boulevard / Coral Street (signalized);
9. Ala Moana Boulevard / Cooke Street (signalized);
10. Ala Moana Boulevard / Ward Avenue (signalized);
11. Ala Moana Boulevard / Kewalo Basin (signalized);
12. Ala Moana Boulevard / Kamakee Street (signalized);
13. Ala Moana Boulevard / Queen Street (signalized);
14. Ala Moana Boulevard / Piikoi Street (signalized);
15. Ward Avenue / Auahi Street (signalized);
16. Ward Avenue / Halekauwila Street (signalized);
17. Ward Avenue / Queen Street (signalized);
18. Piikoi Street / Ala Moana Shopping Center / Hawaiki Tower (signalized);
19. Piikoi Street / Waimanu Street (signalized);
20. Piikoi Street / Kona Street (signalized);
21. Pensacola Street / Waimanu Street (signalized);
22. Kamakee Street / Queen Street (all-way stop-controlled);
23. Kamakee Street / Auahi Street (signalized);
24. Auahi Street / Pedestrian Crossing (Ward Entertainment Center) (signalized);
25. Auahi Street / Pedestrian Crossing (Ward Warehouse/Farmers Market) (signalized);
26. South Street / Pohukaina Street (signalized);
27. South Street / Halekauwila Street (signalized);
28. South Street / Queen Street (signalized);
29. Queen Street / Emily Street (signalized);



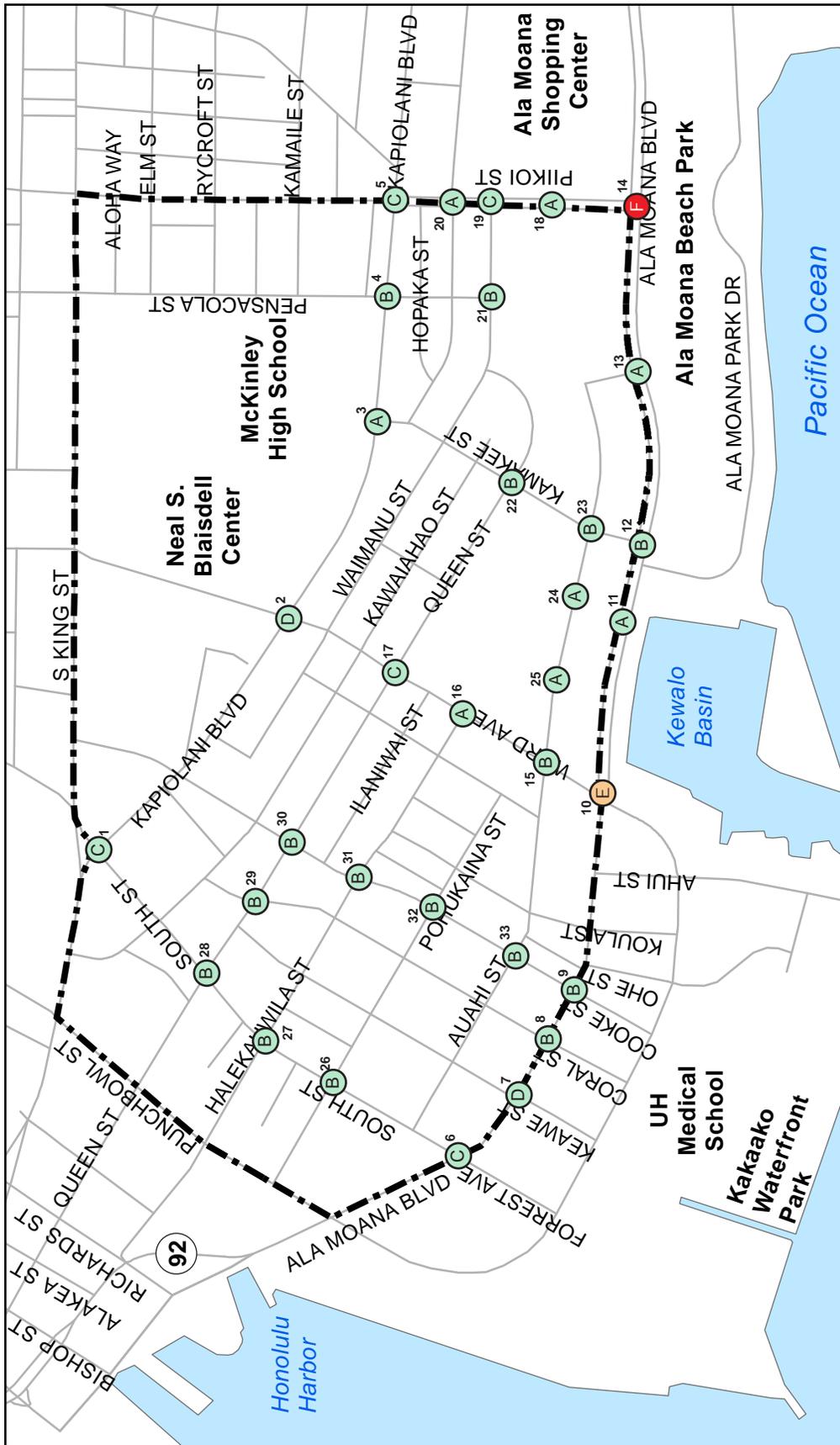
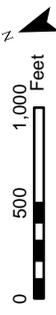


Figure 3-7 Existing Intersection Level of Service, AM Peak Hour

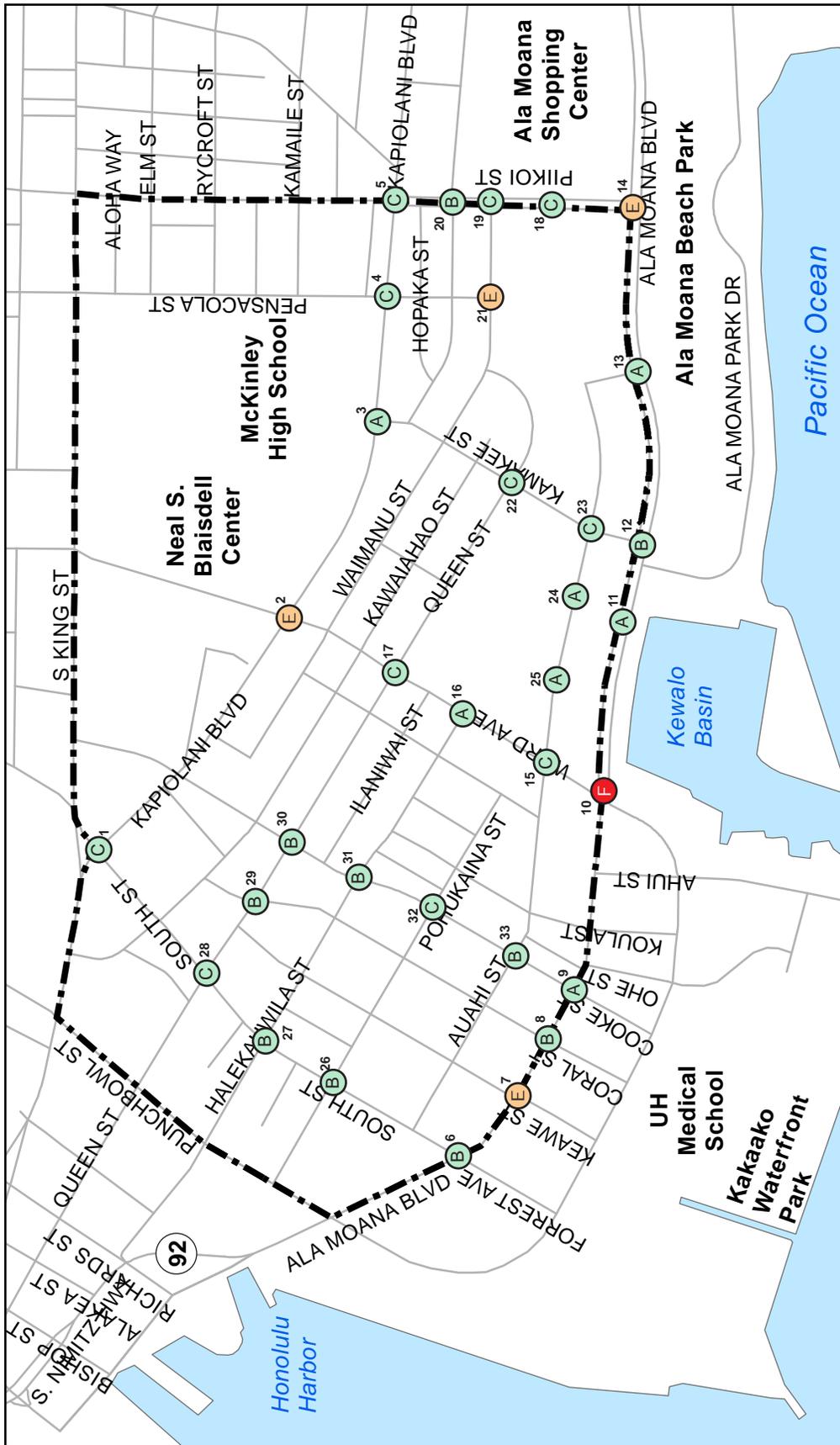
- Mauka Area (Study Boundary)
- Intersection LOS A
- LOS E Intersection
- LOS F Intersection



Source: DMJM/Harris, 2008

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**Figure 3-8 Existing Intersection Level of Service, PM Peak Hour**

- Mauka Area (Study Boundary)
- Intersection LOS A
- LOS E Intersection
- LOS F Intersection

Scale: 0, 500, 1,000 Feet

North Arrow

Source: DMJM/Harris, 2008

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30. Queen Street / Cooke Street (signalized);
31. Halekauwila Street / Cooke Street (all-way stop-controlled);
32. Pohukaina Street / Cooke Street (all-way stop-controlled); and
33. Auahi Street / Cooke Street (two-way stop-controlled).

Table 3-5 presents the results of the intersection LOS analysis for the existing weekday AM and PM peak hour conditions. Due to limitations in the Highway Capacity Manual (HCM) methodology, delay values over 80.0 seconds for signalized intersections are typically considered unreliable. In these cases, the delay is simply given as “greater than 80.0” (>80.0), with the understanding that the intersection is operating poorly. For unsignalized intersections, delay values over 50.0 seconds are considered unreliable and delay is given as “greater than 50.0” (>50.0).

**Table 3-5 Existing Intersection LOS**

Intersection		Traffic Control	Peak Hour	Existing Conditions	
				LOS	Delay
1	Kapiolani Blvd / South St / King St	Signalized	AM	C	30.6
			PM	C	32.0
2	Kapiolani Blvd / Ward Ave	Signalized	AM	D	39.6
			PM	E	57.1
3	Kapiolani Blvd / Kamakee St	Signalized	AM	A	8.7
			PM	A	6.9
4	Kapiolani Blvd / Pensacola St	Signalized	AM	B	19.6
			PM	C	21.5
5	Kapiolani Blvd / Piikoi St	Signalized	AM	C	22.9
			PM	C	24.2
6	Ala Moana Blvd / South St	Signalized	AM	C	26.0
			PM	B	18.6
7	Ala Moana Blvd / Keawe St	Signalized	AM	D	40.6
			PM	E	66.4
8	Ala Moana Blvd / Coral St	Signalized	AM	B	10.9
			PM	B	10.5
9	Ala Moana Blvd / Cooke St	Signalized	AM	B	10.2
			PM	A	4.9
10	Ala Moana Blvd / Ward Ave	Signalized	AM	E	79.8
			PM	F	>80.0
11	Ala Moana Blvd / Kewalo Basin	Signalized	AM	A	4.1
			PM	A	6.2
12	Ala Moana Blvd / Kamakee St	Signalized	AM	B	11.3
			PM	B	19.5
13	Ala Moana Blvd / Queen St	Signalized	AM	A	7.4
			PM	B	12.0
14	Ala Moana Blvd / Piikoi St	Signalized	AM	F	>80.0
			PM	E	64.3

15	Ward Ave / Auahi St	Signalized	AM	B	15.5
			PM	C	21.5
16	Ward Ave / Halekauwila St	Signalized	AM	A	7.3
			PM	C	21.4
17	Ward Ave / Queen St	Signalized	AM	C	25.4
			PM	D	50.3
18	Piikoi St / Ala Moana Ctr.	Signalized	AM	A	7.2
			PM	C	21.1
19	Piikoi St / Waimanu St	Signalized	AM	C	24.7
			PM	C	29.6
20	Piikoi St / Kona St	Signalized	AM	A	9.1
			PM	B	13.8
21	Pensacola St / Waimanu St	Signalized	AM	B	18.4
			PM	E	55.1
22	Kamakee St / Queen St	AWSC	AM	B	11.3
			PM	C	20.4
23	Kamakee St / Auahi St	Signalized	AM	B	17.1
			PM	C	24.9
24	Auahi St / Ward Entertainment Ctr.	Signalized	AM	A	1.8
			PM	A	6.4
25	Auahi St / Ward Warehouse	Signalized	AM	A	3.2
			PM	A	6.4
26	South St / Pohukaina St	Signalized	AM	B	16.2
			PM	B	17.6
27	South St / Halekauwila St	Signalized	AM	B	14.2
			PM	B	17.0
28	South St / Queen St	Signalized	AM	B	19.2
			PM	C	23.4
29	Queen St / Emily St	Signalized	AM	B	16.1
			PM	B	15.0
30	Queen St / Cooke St	Signalized	AM	B	17.7
			PM	B	17.4
31	Halekauwila St / Cooke St	AWSC	AM	B	11.6
			PM	B	13.6
32	Pohukaina St / Cooke St	AWSC	AM	B	11.0
			PM	C	16.8
33	Auahi St / Cooke St	TWSC	AM	B	12.9
			PM	B	13.4

Source: DMJM Harris, 2008

Notes: Delay in seconds per vehicle

BOLD denotes unacceptable conditions

### Transit Facilities

Because of the nature of Downtown Honolulu and the Mauka Area as a focal point of transit service on Oahu, a screenline analysis was used in the evaluation of transit operations. A screenline is a theoretical grouping of transit lines that serve an identifiable corridor or area, chosen such that it passes these lines either at or near their maximum load point (MLP). The MLP is defined as the point along a particular route at which passenger loading on the transit vehicle is the highest.

Once the relevant transit lines are grouped into screenlines, the ridership and capacity for each screenline are combined to obtain a capacity utilization ratio—the ratio of ridership to capacity. To obtain screenline ridership and capacity, the ridership and capacity for each individual line in the screenline are summed together.

Because it was determined during the trip generation process that the peak direction of travel is into the Mauka Area in the AM peak period and out of the Mauka Area in the PM peak period, these were the directions chosen for the screenline analysis.

The transit analysis assumes three screenlines for the Mauka Area—west, east, and north—with each line serving the area being assigned to one or more screenlines. The resulting existing transit capacity utilization is summarized in Table 3-6.

As shown in Table 3-6, all three screenlines operate under capacity, with more crowding on buses serving the north screenline. Lines grouped under the west screenline carry the bulk of trips into and out of the Mauka Area.

Generally speaking, capacity utilization standards generally vary from one transit operator to another and from one mode to another. A capacity utilization in the 80 to 90 percent range would be considered a typical threshold for bus lines serving urban areas such as the Mauka Area (Personal Communication, San Francisco Municipal Transportation Agency, 2008).

**Table 3-6 Existing Transit Capacity Utilization**

Screenline	Existing Conditions		
	Ridership (passengers)	Capacity (passengers)	Capacity Utilization
<b>AM Peak Hour – Inbound</b>			
West	4,635	10,500	44%
East	2,943	6,720	44%
North	351	480	73%
Total	7,929	17,700	45%
<b>PM Peak Hour – Outbound</b>			
West	4,645	10,590	44%
East	2,915	6,300	46%
North	440	660	67%
Total	8,000	17,550	46%

Source: Honolulu DTS, DMJM Harris, 2008

### Bicycle Facilities

There are existing Class I bicycle facilities (bicycle paths) along the waterfront area around Kakaako Waterfront Park and Kewalo Basin. Ala Moana Boulevard, Ward Avenue, South Street, Punchbowl Street, and South Hotel Street are designated as Class III bicycle facilities (bicycle routes).

### Pedestrian Facilities

Existing pedestrian facilities in the Mauka Area are primarily Pedestrian Tolerant or Pedestrian Intolerant Environments. In particular, many streets in Central Kakaako such as Queen Street and Waimanu Street lack curbs and sidewalks, forcing pedestrians to walk in the street. Cooke Street between Queen Street and Kapiolani Boulevard and Halekauwila Street between Punchbowl Street and South Street are Pedestrian-Supportive Environments. The Ward Centers adjacent to Auahi Street and Kamakee Street is the only Pedestrian Place in the Mauka Area, attracting pedestrians who come to shop. However, these Pedestrian Supportive Environments and Pedestrian Places are connected by only Pedestrian Tolerant and Pedestrian Intolerant Environments, making travel by foot an unattractive and sometimes unsafe alternative.

## 3.7.2 Potential Impacts and Mitigation Measures

This section assesses transportation conditions under the Draft Mauka Area Plan. The impact analysis considers the following transportation-related topics: traffic, transit, pedestrians, and bicycles.

### Significance Criteria

Significance criteria are a means of evaluating the significance of impacts generated by a proposed change. In the case of this analysis, the change being proposed is the change in Cumulative Conditions traffic operations as a result of adoption of the Draft Mauka Area Plan. In order to determine the change in Cumulative Conditions traffic operations under the Draft Mauka Area Plan, a “baseline” case, which assumes no changes to the existing Mauka Area Plan, was also evaluated.

Since the existing Mauka Area Plan is currently in effect, the No-Action Alternative represents the “baseline” case for evaluating the significance of impacts under the Preferred Alternative. The traffic operations under Preferred Alternative are then compared directly to those under No-Action Alternative using the significance criteria to identify significant impacts which would require mitigation.

A set of significance criteria was developed based on typical significance criteria used in urban areas such as the Mauka Area. In general, if operations under the Preferred Alternative are expected to perform worse than under the No-Action Alternative, the Draft Mauka Area Plan would result in a significant impact and any possible mitigation measures must be considered. The significance criteria developed for this analysis are summarized below.

#### *For Intersections*

The operational impacts on intersections are considered significant if plan-related traffic causes the level of service to deteriorate from LOS E or better under No-Action Alternative to LOS F under the Preferred Alternative.

The operational impacts on signalized intersections operating at LOS F under both the No-Action and Preferred Alternatives are considered significant if the volume-to-capacity (v/c) ratio under the Preferred Alternative exceeds that of the No-Action Alternative.

#### *For Transit Facilities*

The operational impacts on transit facilities are considered significant if the plan causes a substantial increase in transit demand that could not easily be accommodated by available transit capacity, resulting in unacceptable levels of transit service. A capacity utilization above 80 to 90 percent is generally considered unacceptable for urban transit services.

The operational impacts on transit facilities are considered significant if the plan causes a substantial increase in operational delay or costs that could result in adverse impacts to transit service.

#### *For Pedestrian Facilities*

The operational impacts on pedestrian facilities are considered significant if the plan would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

### For Bicycle Facilities

The operational impacts on ~~bicycle pedestrian~~ facilities are considered significant if the plan would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.

### Traffic Impacts

Future traffic volumes in Cumulative Conditions were forecasted using growth factors obtained from the Oahu Metropolitan Planning Organization (OMPO) travel demand forecast model. Future growth in traffic volumes under the Preferred Alternative were based on the expected increase in the amount and type of land uses in the Mauka Area. Future growth in traffic volumes due to the Makai Area Plan was obtained from the Final Environmental Assessment (FEA) for the Makai Area Plan Amendment, conducted by Wilson Okamoto Corporation in 2005. Cumulative east-west through volumes along Ala Moana Boulevard were also compared to volumes given in the same analysis to ensure consistency.

The resulting intersection level of service for the weekday AM and PM peak hour is summarized in Table 3-7. Cumulative Conditions under the Preferred Alternative most intersections are expected to operate worse than they do in Existing Conditions. Intersections along Kapiolani Boulevard, Ala Moana Boulevard, and Ward Avenue are expected to operate poorly (LOS E or LOS F) during both the weekday AM and PM peak hours. The same result would occur under the No-Action Alternative because of regional traffic growth.

**Table 3-7 Draft Mauka Area Plan Intersection Level of Service**

Intersection	Traffic Control	Peak Hour	Existing Conditions		Cumulative Conditions			
			LOS	Delay	No-Action Alternative		Preferred Alternative	
					LOS	Delay	LOS	Delay
1 Kapiolani Blvd / South St / King St	Sig.	AM	C	30.6	E	66.3	E	59.4
		PM	C	32.0	F	>80.0	F	>80.0
2 Kapiolani Blvd / Ward Ave	Sig.	AM	D	39.6	F	>80.0	F	>80.0
		PM	E	57.1	F	>80.0	F	>80.0
3 Kapiolani Blvd / Kamakee St	Sig.	AM	A	8.7	E	75.6	E	75.3
		PM	A	6.9	C	24.8	C	28.3
4 Kapiolani Blvd / Pensacola St	Sig.	AM	B	19.6	E	75.9	<b>F</b>	<b>&gt;80.0</b>
		PM	C	21.5	D	39.1	<b>F</b>	<b>&gt;80.0</b>
5 Kapiolani Blvd / Piikoi St	Sig.	AM	C	22.9	E	58.1	<b>F</b>	<b>&gt;80.0</b>
		PM	C	24.2	D	37.0	<b>F</b>	<b>&gt;80.0</b>
6 Ala Moana Blvd / South St	Sig.	AM	C	26.0	F	>80.0	F	>80.0
		PM	B	18.6	F	>80.0	F	>80.0
7 Ala Moana Blvd / Keawe St	Sig.	AM	D	40.6	F	>80.0	F	>80.0
		PM	E	66.4	F	>80.0	F	>80.0
8 Ala Moana Blvd / Coral St	Sig.	AM	B	10.9	F	>80.0	F	>80.0
		PM	B	10.5	F	>80.0	F	>80.0
9 Ala Moana Blvd / Cooke St	Sig.	AM	B	10.2	F	>80.0	F	>80.0
		PM	A	4.9	F	>80.0	F	>80.0

	Intersection	Traffic Control	Peak Hour	Existing Conditions		Cumulative Conditions			
						No-Action Alternative		Preferred Alternative	
				LOS	Delay	LOS	Delay	LOS	Delay
10	Ala Moana Blvd / Ward Ave	Sig.	AM	E	79.8	F	>80.0	F	>80.0
			PM	F	>80.0	F	>80.0	F	>80.0
11	Ala Moana Blvd / Kewalo Basin	Sig.	AM	A	4.1	D	37.4	D	35.6
			PM	A	6.2	E	71.6	E	74.1
12	Ala Moana Blvd / Kamakee St	Sig.	AM	B	11.3	F	>80.0	E	71.6
			PM	B	19.5	F	>80.0	F	>80.0
13	Ala Moana Blvd / Queen St	Sig.	AM	A	7.4	F	>80.0	F	>80.0
			PM	B	12.0	F	>80.0	F	>80.0
14	Ala Moana Blvd / Piikoi St	Sig.	AM	F	>80.0	F	>80.0	F	>80.0
			PM	E	64.3	F	>80.0	F	>80.0
15	Ward Ave / Auahi St	Sig.	AM	B	15.5	C	31.9	D	42.4
			PM	C	21.5	F	>80.0	D	53.2
16	Ward Ave / Halekauwila St	Sig.	AM	A	7.3	D	54.3	<b>F</b>	<b>&gt;80.0</b>
			PM	C	21.4	D	43.0	<b>F</b>	<b>&gt;80.0</b>
17	Ward Ave / Queen St	Sig.	AM	C	25.4	C	30.1	<b>F</b>	<b>&gt;80.0</b>
			PM	D	50.3	D	53.5	<b>F</b>	<b>&gt;80.0</b>
18	Piikoi St / Ala Moana Ctr.	Sig.	AM	A	7.2	A	9.0	A	9.7
			PM	C	21.1	B	18.8	B	19.4
19	Piikoi St / Waimanu St	Sig.	AM	C	24.7	B	13.2	B	15.7
			PM	C	29.6	C	26.4	B	14.1
20	Piikoi St / Kona St	Sig.	AM	A	9.1	B	10.0	A	7.7
			PM	B	13.8	B	11.2	A	9.2
21	Pensacola St / Waimanu St	Sig.	AM	B	18.4	A	9.2	B	11.4
			PM	E	55.1	B	14.2	C	34.8
22	Kamakee St / Queen St	AWSC	AM	B	11.3	A	7.1	C	17.4
			PM	C	20.4	A	8.4	E	50.0
23	Kamakee St / Auahi St	Sig.	AM	B	17.1	B	13.3	B	16.1
			PM	C	24.9	C	26.7	C	24.4
24	Auahi St / Ward Entrmt. Ctr.	Sig.	AM	A	1.8	A	1.9	A	2.0
			PM	A	6.4	A	9.1	A	8.1
25	Auahi St / Ward Warehouse	Sig.	AM	A	3.2	A	2.8	A	2.7
			PM	A	6.4	A	6.9	A	6.6
26	South St / Pohukaina St	Sig.	AM	B	16.2	C	24.1	B	19.4
			PM	B	17.6	E	55.6	C	25.1
27	South St / Halekauwila St	Sig.	AM	B	14.2	B	12.3	B	12.7
			PM	B	17.0	B	14.7	B	15.3
28	South St / Queen St	Sig.	AM	B	19.2	B	15.2	B	18.7
			PM	C	23.4	C	25.0	D	39.3
29	Queen St / Emily St	Sig.	AM	B	16.1	C	26.8	B	16.7
			PM	B	15.0	C	33.1	B	17.4

	Intersection	Traffic Control	Peak Hour	Existing Conditions		Cumulative Conditions			
						No-Action Alternative		Preferred Alternative	
				LOS	Delay	LOS	Delay	LOS	Delay
30	Queen St / Cooke St	Sig.	AM	B	17.7	B	14.7	C	22.3
			PM	B	17.4	B	15.1	C	30.1
31	Halekauwila St / Cooke St	AWSC	AM	B	11.6	B	11.9	E	48.8
			PM	B	13.6	B	11.0	<b>F</b>	<b>&gt;50.0</b>
32	Pohukaina St / Cooke St	AWSC	AM	B	11.0	D	30.2	<b>F</b>	<b>&gt;50.0</b>
			PM	C	16.8	F	>50.0	<b>F</b>	<b>&gt;50.0</b>
33	Auahi St / Cooke St	TWSC	AM	B	12.9	C	18.8	C	16.6
			PM	B	13.4	D	29.2	D	25.4

Source: DMJM Harris, 2008

Notes: Delay in seconds per vehicle

**BOLD** denotes a significant impact

### Transit Impacts

Because the fixed guideway system will operate along an east-west alignment through the Mauka Area, it was assigned to both the east and west screenlines for the Cumulative Conditions transit analysis. The expected capacity of the fixed guideway was based on a line-haul capacity standard of 3,000 to 5,000 people per hour per day (pphd) used in the technology screening analysis conducted by Parsons Brinckerhoff in 2006 (Parsons Brinckerhoff, 2006). The expected Cumulative Conditions ridership after implementation of the fixed guideway system is also based on the numbers presented in the technology screening analysis. The resulting Cumulative Conditions transit capacity utilization under the No Action Alternative for the weekday AM and PM peak hour is summarized in Table 3-8.

As shown in Table 3-8, the fixed guideway system is expected to substantially increase capacity in the west and east screenlines. The guideway system is also expected to draw new riders to transit because of its improvement over existing bus services in terms of speed, reliability, and frequency, thus causing an increase in ridership across the west screenline. There is no appreciable change in capacity utilization in Cumulative Conditions under the No Action and Preferred Alternatives. Capacity utilization is below the 80 to 90 percent threshold typically considered acceptable for urban areas.

**Table 3-8 Draft Mauka Area Plan Transit Capacity Utilization**

Screenline	Existing Conditions			Cumulative Conditions					
				No-Action Alternative			Preferred Alternative		
	Rid. (pax)	Cap. (pax)	Cap. Util.	Rid. (pax)	Cap. (pax)	Cap. Util.	Rid. (pax)	Cap. (pax)	Cap. Util.
<b>AM Peak Hour – Inbound</b>									
West	4,635	10,500	44%	9,732	15,680	62%	9,677	15,680	62%
East	2,943	6,720	44%	5,771	13,850	42%	5,713	13,850	42%
North	351	480	73%	1,198	2,280	53%	1,195	2,280	53%
Total	7,929	17,700	45%	16,701	31,810	53%	16,585	31,810	53%

Screenline	Existing Conditions			Cumulative Conditions					
	Rid. (pax)	Cap. (pax)	Cap. Util.	No-Action Alternative			Preferred Alternative		
				Rid. (pax)	Cap. (pax)	Cap. Util.	Rid. (pax)	Cap. (pax)	Cap. Util.
<b>PM Peak Hour – Outbound</b>									
West	4,645	10,590	44%	9,954	16,490	60%	9,873	16,490	60%
East	2,915	6,300	46%	6,194	15,440	40%	6,108	15,440	40%
North	440	660	67%	1,341	2,220	60%	1,338	2,220	60%
<b>Total</b>	<b>8,000</b>	<b>17,550</b>	<b>46%</b>	<b>17,489</b>	<b>34,150</b>	<b>51%</b>	<b>17,319</b>	<b>34,150</b>	<b>51%</b>

Source: DMJM Harris, 2008

Notes: pax = passengers, Rid. = Ridership, Cap. = Capacity, Cap. Util. = Capacity Utilization

### Pedestrian Impacts

The Draft Mauka Area Plan proposes an urban design that is pedestrian-friendly and encourages walking for both leisure and business. Development of a base network of Pedestrian Tolerant and Pedestrian Supportive Environments will make walking safer and more attractive for residents, workers, and visitors in the Mauka Area.

Under the Draft Mauka Area Plan, there are expected to be an additional 950 pedestrian trips in the AM peak hour and an additional 1,200 pedestrian trips in the PM peak hour. It should be noted, however, that the pedestrian mode split assumed for the Draft Mauka Area Plan is identical to the pedestrian mode split assumed for the No-Action Alternative. Given that the Draft Mauka Area Plan is designed with more Pedestrian Supportive elements, it seems likely that the number of pedestrian trips would increase substantially.

Observations indicated that existing pedestrian traffic was light, with pedestrian facilities such as sidewalks and crosswalks operating at free-flow conditions. Once the proposed improvement measures under the Draft Mauka Area Plan have been implemented, however, both the quality and capacity of the pedestrian network are expected to increase. In addition, mid-block signalization for streets such as Pensacola Street may be necessary to facilitate pedestrian crossing.

The exact impact of the Draft Mauka Area Plan on pedestrian operations is difficult to estimate given the wide range of uncertainties surrounding each development at this stage of the process. Each proposed development should be evaluated during the approval process to ensure that no significant impacts to pedestrian facilities are likely to occur due to location of driveways and curb cuts and design elements such as building frontage. In particular, any development that is proposed as TOD should be designed to maximize transit use, including the provision of a safe, pleasant walking environment between the development and the transit facility.

### Bicycle Impacts

The Draft Mauka Area Plan supports the 2003 State Bike Plan and the DOT Honolulu Bicycle Master Plan. The 2003 State Bike Plan proposes bike lanes to be created along Ala Moana Boulevard. Class II bicycle facilities (bicycle lanes) are planned for most major streets in the Mauka Area, including Ala Moana Boulevard, Kapiolani Boulevard, King Street, Beretania

Street, Ward Avenue, and Pensacola Street. The existing Ala Moana Boulevard consists of an 84 foot curb-to-curb width with seven vehicle lanes ranging from nine to 12 feet in width. A dedicated bike lane would require an additional five feet on each side of the street. Bicycle lanes along Ala Moana Boulevard and Kapiolani Boulevard would likely require removal of at least one lane of vehicular traffic due to roadway right-of-way constraints. Given the heavy traffic volumes on these streets, it is impractical to remove one lane of traffic for a bicycle lane which would likely not be heavily used. In addition, both Ala Moana Boulevard and Kapiolani Boulevard are wide arterials with relatively high speeds compared to local streets, which may reduce the utility of a dedicated bicycle lane if bicyclists choose not to use it due to safety concerns. Options being considered by HCDA with consultation with DTS and DOT include providing a multi-use path to accommodate a wide variety of non-motorized transportation. Development of a multi-use path would require acquiring additional private land or creating a public use easement. Another option is to create wider curb lanes to create a bicycle route for most major streets in the Mauka Area, including Ala Moana Boulevard, Kapiolani Boulevard, King Street, Beretania Street, Ward Avenue, and Pensacola Street. Creating a wider curb lane on streets with limited ROW width will require the acquisition of additional private property or a use easement.

It should also be noted that Class I bicycle facilities already exist along the Kakaako waterfront. Implementing an additional Class II facility on Ala Moana Boulevard would likely duplicate these existing facilities. Designating these two roadways as Class III facilities is likely sufficient.

Roadway width on Ward Avenue and Pensacola Street should be sufficient to accommodate bicycle lanes. These streets carry lower traffic volumes than either Ala Moana Boulevard or Kapiolani Boulevard and continue past the freeway into Punchbowl and Makiki Heights, offering a connection between the Mauka Area and the neighborhoods further east. Installing bicycle lanes on Ward Avenue and Pensacola Street should be considered a top priority after the extension of the recreational bicycle path from Ala Moana Park.

Although the Draft Mauka Area Plan is expected to generate 250 bicycle trips in the AM peak hour and 350 bicycle trips in the PM peak hour, many of these trips are expected to be short-distance trips either within or just outside the Mauka Area. These trips would likely make use of more local roadways such as Queen Street or Halekauwila Street, which have lower traffic volumes and slower traffic speeds, and can more safely accommodate bicyclists. Therefore, the Draft Mauka Area Plan is not expected to have a significant impact on bicycle conditions. However, each proposed development should be evaluated during the approval process to ensure that no significant impacts to bicycle facilities are likely to occur due to design elements which increase the potential for conflict between bicycles and other modes of travel such as automobiles and pedestrians.

#### On-Street Parking

The Draft Mauka Area Plan would retain on-street parking where appropriate, both to support local businesses and to serve as a buffer zone for pedestrians on the sidewalk.

#### Mitigation Measures

Table 3-9 summarizes the mitigation measures for the Draft Mauka Area Plan. Each owner, developer, and/or successor-in-interest of any proposed project in the Mauka Area shall be responsible for their proportionate share of the following mitigation measures.

**Table 3-9 Mitigation Measures**

#	Impact	Level of Significance	Mitigation Measure	Significance After Mitigation
<b>Traffic Impacts</b>				
1	In Cumulative Conditions under the Preferred Alternative, the signalized intersection of Kapiolani Boulevard / Pensacola Street operates at LOS F in both the AM and PM peak hours. In Cumulative Conditions under the Existing Mauka Area Plan, it operates at LOS E in the AM peak hour and at LOS D in the PM peak hour.	Significant	Retain the existing one-way couplet between Pensacola Street and Piikoi Street.	Less than Significant
2	In Cumulative Conditions under the Preferred Alternative, the signalized intersection of Kapiolani Boulevard / Piikoi Street operates at LOS F in both the AM and PM peak hours. In Cumulative Conditions under the Existing Mauka Area Plan, it operates at LOS E in the AM peak hour and at LOS D in the PM peak hour.	Significant	Retain the existing one-way couplet between Pensacola Street and Piikoi Street.	Less than Significant
3	In Cumulative Conditions under the Preferred Alternative, the signalized intersection of Ward Avenue / Halekauwila Street operates at LOS F in both the AM and PM peak hours. In Cumulative Conditions under the Existing Mauka Area Plan, it operates at LOS D in both the AM and PM peak hours.	Significant	No feasible mitigation measure available. Insufficient right-of-way to accommodate modifications to roadway and intersection geometry to mitigate this impact.	Significant and Unavoidable
4	In Cumulative Conditions under the Preferred Alternative, the signalized intersection of Ward Avenue / Queen Street operates at LOS F in both the AM and PM peak hours. In Cumulative Conditions under the Existing Mauka Area Plan, it operates at LOS C in the AM peak hour and at LOS D in the PM peak hour.	Significant	No feasible mitigation measure available. Insufficient right-of-way to accommodate modifications to roadway and intersection geometry to mitigate this impact.	Significant and Unavoidable

#	Impact	Level of Significance	Mitigation Measure	Significance After Mitigation
5	In Cumulative Conditions under the Preferred Alternative, the all-way stop-controlled intersection of Halekauwila Street / Cooke Street operates at LOS F in the PM peak hour. In Cumulative Conditions under the Existing Mauka Area Plan, it operates at LOS B in the PM peak hour.	Significant	Signalize the intersection.	Less than Significant
6	In Cumulative Conditions under the Preferred Alternative, the all-way stop-controlled intersection of Pohukaina Street / Cooke Street operates at LOS F in the AM peak hour. In Cumulative Conditions under the Existing Mauka Area Plan, it operates at LOS D in the AM peak hour.	Significant	Signalize the intersection.	Less than Significant

#### Transit Impacts

No significant transit impacts were identified.

#### Bicycle Impacts

No significant bicycle impacts were identified.

#### Pedestrian Impacts

~~No significant pedestrian impacts were identified.~~ Mid-block signalization for streets such as Pensacola Street may be necessary to facilitate pedestrian crossing.

Source: DMJM Harris, 2008

## 3.8 Noise

According to Title 11, Chapter 46, HAR, *Community Noise Control*, “noise” means any sound that may produce adverse physiological effects or interfere with individual or group activities, including, but not limited to, communication, work, rest, recreation, or sleep. “Noise pollution” means noise emitted from any excessive noise source in excess of the maximum permissible sound levels. The accepted unit of measure for noise levels is the decibel (dB) because it reflects the way humans perceive changes in sound amplitude. Sound levels are easily measured, but human response and perception of the wide variability in sound amplitude is subjective.

Various local and federal agencies have established guidelines and standards for assessing environmental noise impacts and set noise limits as a function of land use. Chapter 46, HAR defines three classes of zoning districts and specifies corresponding maximum permissible sound levels due to stationary noise sources such as air-conditioning units, exhaust systems, generators, compressors, pumps, etc., and equipment related to agricultural, construction, and industrial activities. In determining the maximum permissible sound level, the background noise level is

taken into account. These levels are enforced by Department of Health (DOH) for any location at or beyond the property line.

The DOH monitors noise issues in accordance with Chapter 19-342F, HRS. The Occupational Safety and Health Act (OSHA) of 1970 was established to “assure the safe and healthy working conditions for working men and women”. OSHA regulations established a maximum noise level of 90 A-weighted decibels (dBA) for a continuous 8-hour exposure (typical work day) with higher maximum noise levels for shorter duration periods. The A-weighted sound level is a unit of sound pressure that accounts for the difference in human sensitivity to higher and lower frequency sounds at the same decibel level. Thus, different sounds with the same A-weighted sound level are perceived as being equally loud. Table 3-10 summarizes the maximum possible sound levels for various noise durations.

**Table 3-10 Permissible Noise Exposure Levels**

<b>Duration (Hours / Day)</b>	<b>Permissible Sound Level (dBA)</b>
<b>8</b>	90
<b>6</b>	92
<b>4</b>	95
<b>3</b>	97
<b>2</b>	100
<b>1 to 1 1/2</b>	102
<b>1</b>	105
<b>1/2</b>	110
<b>1/4 or less</b>	115

Source: 29 CFR 1910.95

With respect to mixed-uses, Chapter 46, HAR specifies that the primary land use designation shall be used to determine the applicable zoning district class and the maximum permissible sound level. Because the prevalent land uses in the Mauka Area are mixed-uses between multi-family residential, commercial, and light industrial, Class B restriction is most relevant (see Table 3-11). The allowable noise level in the Mauka Area, as set forth in the existing Mauka Area Plan, also coincides with DOH’s Class B restriction; therefore, there is no conflict of rules. To deviate from these restrictions, permits must be obtained from DOH. The same rule applies when noise levels exceed more than 10 percent of the time during any 20-minute period. Enforcement of DOH noise regulations, through citations of defective equipment and limitation of excessively noisy operations, will further mitigate unnecessary noise impacts from construction activities.

**Table 3-11 Maximum Noise Level Allowed**

<b>Zoning District</b>	<b>Day Hours (7 AM to 10 PM)</b>	<b>Night Hours (10 P M to 7 AM)</b>
Class A residential, conservation, preservation, public space, open space	55 dBA (exterior)	45 dBA (exterior)
Class B multi-family dwellings, apartments, business, commercial, hotel, resort	60 dBA (exterior)	50 dBA (exterior)
Class C agriculture, country, industrial	70 dBA (exterior)	70 dBA (exterior)

Source, Title 11 Chapter 46, HAR

### 3.8.1 Affected Environment

Centrally located in Honolulu, the Mauka Area consists of a wide range of mixed-use developments. Ward Entertainment Center and the affiliated Ward Centers attract residents and visitors alike to its shops, eateries, and other commercial neighborhood establishments. Light industrial uses in Central Kakaako attract a sizable clientele drawn to automotive repairs, furniture showrooms, and neighborhood restaurants. The Mauka Area, with the advent of mixed-use residential towers, is beginning to feature high density developments, which is likely to continue with or without the implementation of the Mauka Area Plan.

The Mauka Area experiences ambient noise resulting from four principal sources: automobile-induced traffic; operation of industrial equipments; operation of construction equipments; and occasional distant aviation fly-bys. Noise from stationary equipment and business activities within Kakaako are generally masked by traffic noise during daytime periods. Generally speaking, traffic and construction activities are among the more audible and consistent sources of noise within the Mauka Area. During weekends, noise levels increase with the influx of visitors to the commercial areas as well as the adjoining Ala Moana Beach Park users.

### 3.8.2 Potential Impacts and Mitigation Measures

Intermittent elevated noise levels from certain types of construction activities are inevitable and considered short-term impacts. Continued use of construction equipment and activity involved in excavation, grading, and other typical construction activities may increase short-term noise levels. Pile drivers and rock drills, as well as earthmoving equipment such as bulldozers and diesel power trucks are anticipated to be the loudest equipment during construction. To alleviate potential construction noise impact, it is assumed that measures such as the use of properly muffled construction equipment and incorporation of the DOH construction noise limits pursuant to the provisions of Title 11, Chapter 46, HAR, *Community Noise Control*, would be adhered to during the duration of construction. If construction noise exceeds or is expected to exceed the State's maximum permissible property line noise levels, a construction noise permit would be obtained from DOH.

The United States Environment Protection Agency (EPA) has identified a range of day-night equivalent sound levels, abbreviated as  $L_{dn}$ , sufficient to protect public health and welfare from the effects of environmental noise. The EPA has established a goal to reduce exterior environmental noise to an  $L_{dn}$  not exceeding 65dBA and a future goal to further reduce exterior environmental noise to an  $L_{dn}$  not exceeding 55dBA. Additionally, the EPA states that these goals are not intended as regulations as it has no authority to regulate noise levels, but rather they are intended to be viewed as levels below which the general population will not be at risk from any of the identified effects of noise. A portion of the Mauka Area is outside of the 55  $L_{dn}$  noise contours for the Honolulu International Airport (HDOT-Airports, Noise Exposure Map, 2003). Although the occasional aircraft fly-by noise may be audible, the noise level is compatible with the Federal Aviation Agency and HDOT-Airports Division land use compatibility guidelines. Therefore, additional mitigation measures to mitigate flyby noise are not proposed.

## 3.9 Air Quality

Air pollution is caused by many human-induced and natural sources. There are industrial sources of pollution, such as power plants and refineries; mobile sources, such as cars, trucks, and buses; agricultural sources, such as cane burning; and natural sources, such as windblown dust and volcanic activity. Most commercial, industrial, and transportation activities and their associated air quality effects occur on Oahu.

To protect public health and welfare and to prevent the significant deterioration of air quality, EPA has established the National Ambient Air Quality Standards (NAAQS), last amended in 1990, for detection of certain harmful pollutants using two standards. The *Primary* standards set limits to protect public health, including the health of “sensitive” populations, such as, asthmatics, children, and the elderly. The *Secondary* standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. DOH has also established ambient air quality standards to regulate the air quality statewide.

There are two monitoring stations near the Mauka Area, one in downtown Honolulu, on the roof of the DOH building at Kinau Hale and the other at the University of Hawaii’s Anuenue Fisheries near the entrance to the Sand Island State Recreation Area, established in 1960 and 1980, respectively. Both sites contain National Air Monitoring Station (NAMS) as well as State and Local Air Monitoring Stations (SLAMS). The Kinau Hale SLAMS measures population exposure to carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and particulate matters (PM<sub>2.5</sub> and PM<sub>10</sub>); the Sand Island SLAMS measures population exposure to ozone (O<sub>3</sub>).

### 3.9.1 Affected Environment

Hawaii’s oceanic setting and tradewind-dominated climate account for exceptionally clean air. Generally speaking, air quality in the State of Hawaii is one of the best in the nation, and criteria pollutant levels remain well below state and federal ambient air quality standards. Favorable topography and relatively little heavy industry are other contributing factors. However, the large number of automobiles concentrated in the Honolulu urban core (Pearl Harbor to Diamond Head) is a recognized source of air pollution. During times of unfavorable meteorological conditions (such as low wind speed) and heavy traffic, carbon monoxide can reach relatively high levels in the immediate vicinity of major traffic corridors, but long-term persistence of air pollution is rare.

According to the DOH’s “Annual Summary of 2006 Hawaii Air Quality Data”, the pollutants measured between 2002 through 2006 at Kinau Hale and Sand Island SLAMS were well below state and federal standards (in parentheses):

- PM<sub>10</sub> – Kinau Hale: 14µg/m<sup>3</sup> (50µg/m<sup>3</sup>);
- PM<sub>2.5</sub> – Kinau Hale: 3.8µg/m<sup>3</sup>, Sand Island: 5.2µg/m<sup>3</sup> (15µg/m<sup>3</sup>);
- SO<sub>2</sub> – Kinau Hale: 1.4µg/m<sup>3</sup> (80µg/m<sup>3</sup>);
- CO – Kinau Hale: 1,000µg/m<sup>3</sup> (State standard: 10,000µg/m<sup>3</sup>, Federal standard: 40,000µg/m<sup>3</sup>).

### 3.9.2 Potential Impacts and Mitigation Measures

Any impacts on air quality associated with the proposed Mauka Area would likely be related to construction and automobile-induced traffic. Short term direct impacts on air quality could potentially occur due to construction activities. Impacts may include: fugitive dust from vehicle movement and soil excavation; and exhaust emissions from on-site construction equipment. Direct impacts could result from slow moving construction equipment traveling to and from construction areas and disruption of normal traffic flow due to lane closures affected by construction activities. The City and County of Honolulu Design and Construction Department recommends applying the following BMPs:

- Water active work areas and disturbed dust sources frequently;
- Plan different phases of construction so as to limit the area to be disturbed;
- Apply mulching, chemical soil stabilizers, or wind screens to minimize wind erosion;
- Cover open-bodied, dirt-hauling trucks;
- Adopt a road cleaning and/or tire washing program; and,
- Pave areas and/or establish landscaping early in the construction schedule.

The recommended BMPs listed above would reduce short-term direct impacts on air quality resulting from short-term construction activities. Emission from vehicle sources entering, leaving, and passing through the Mauka Area and its vicinity may increase as the result of the Mauka Area being built out with additional residential, commercial, and industrial uses. According to DOH statistics, air pollution generated by traffic is not a significant problem or issue on Oahu.

## 3.10 Parks, Open Space, and Visual Resources

### 3.10.1 Affected Environment

#### Parks and Open Space

As shown in Figure 2-3 (“Open Space Network”), the Mauka Area contains approximately nine acres of existing public park space as well as privately dedicated parks. Mother Waldron Neighborhood Park Playground is registered on both HRHP and NRHP because of its distinct Art Deco features. Queen Park is designated as a two acre passive park traversing Queen Street between Waimanu Street and Kamakee Street. There are also two privately owned public parks, located at the corner of Cooke Streets and Kawaiahao Street and along Ala Moana Boulevard as part of the Waterfront Plaza project. Additionally, since the inception of the original KCDD Plan in 1982, 17 acres of private recreational space have been developed in the Mauka Area. Nearby parks and open space include the Kakaako Waterfront Park and the Gateway Park, Kewalo Basin Park, and Ala Moana Beach Park.

#### Visual Resources

The Mauka Area is mixed with low density small lots, high density residential towers, new commercial/entertainment uses, cultural and education facilities, and light industrial warehouses. The urban fabric is eclectic indicating that different neighborhoods in the Mauka Area exhibit a variety of individual urban neighborhood character. These neighborhoods are: Sheridan, Central

Kakaako, Thomas Square, Civic Center, Kapiolani, Pauahi, and Auahi. Each neighborhood’s visual characteristics is described below and illustrated in the following pictures.

**Sheridan Neighborhood**

Sheridan consists of older small lot low density urban residential developments bounded by mixed-use low density development on King Street and new high density development along Kapiolani Boulevard (Pictures 3-1 and 3-2).

**Picture 3-1**



Sheridan at Piikoi Street

**Picture 3-2**



View towards Makai at Piikoi and King Streets

**Sheridan Neighborhood**

**Central Kakaako**

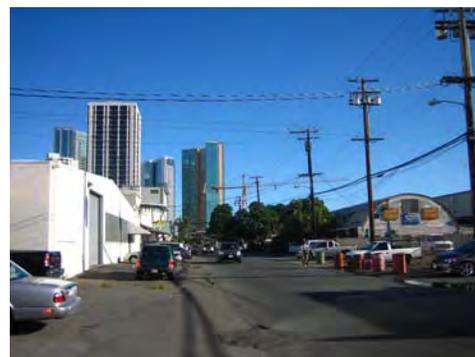
Central Kakaako is primarily composed of small lots that consist mainly of service and small light industrial businesses. This area consists of buildings, primarily garages and warehouses with little to no street parking, and unimproved streets (i.e., no curb cuts, sidewalks or storm drains) (Pictures 3-3 and 3-4).

**Picture 3-3**



Central Kakaako Unimproved Road

**Picture 3-4**



Central Kakaako Business District

**Central Kakaako**

*Thomas Square*

The Thomas Square neighborhood is mostly composed of institutional uses on large lots with open space surrounding these uses (Pictures 3-5 and 3-6).

**Picture 3-5**



Thomas Square

**Picture 3-6**



McKinley High School

**Thomas Square**

*Civic Center Neighborhood*

The Civic Center neighborhood has public buildings in a campus-like setting, with open spaces surrounding these uses. It also has some of Honolulu’s important historic buildings. (Pictures 3-7, and 3-8).

**Picture 3-7**



Honolulu Advertiser Building

**Picture 3-8**



Kawaiahao Church

**Civic Center Neighborhood**

*Kapiolani Corridor:*

The Kapiolani Corridor is primarily infill high density mixed-use development along this major transportation corridor on the edge of the Mauka Area (Pictures 3-9 and 3-10).

**Picture 3-9**



Lexus Dealership

**Picture 3-10**



Honolulu Design Center

**Kapiolani Corridor**

*Pauahi Neighborhood:*

The Pauahi neighborhood is transforming into new large scale high density mixed-use and residential development with 400-foot high tower-elements and a former large electronics store (Picture 3-11 and 3-12). These tower elements have much more visibility than the previous low height element in the neighborhood.

**Picture 3-11**



One Waterfront Tower Building

**Picture 3-12**



Former CompUSA

**Pauahi Neighborhood**

**Auahi Neighborhood:**

Much like the Pauahi neighborhood, the Auahi neighborhood is transforming into a new large scale high density mixed-use and residential development with 400-foot high tower-elements and the Ward Center, which includes a retail and entertainment uses (Picture 3-13 and 3-14).

**Picture 3-13**

Auahi Neighborhood.

**Picture 3-14**

Ward Center.

**Auahi Neighborhood**

As shown and described in the photographs above, each neighborhood has its own distinct character that is slowly transforming as new development occurs in the Mauka Area. The scale of new developments in the Mauka Area are different from existing neighboring development and create a visual disconnect at the pedestrian level. For example, in the Auahi neighborhood: Ward Theatres and Shops activate pedestrian activity along Queen Street and Kamakee Street with numerous pedestrian elements and appropriately scaled store street fronts. However, neighboring tower elements along Piikoi and Waimanu Streets do not have many features at the pedestrian level. Views of the Waikiki skyline are restricted, and shadows are created throughout the day along the perimeter of Waimanu Street and sidewalks.

A defining feature of Oahu's natural visual assets are views of the Koolau Range. The PUCDP identifies two vantage points that offer panoramic views of the Koolau Range. These two vantage points are located at Kakaako Waterfront Park and Kewalo Basin. Both vantage points cover a 360 degree panoramic view of the Waianae Range, downtown Honolulu skyline, Kakaako, the Koolau Range, Waikiki, and Diamond Head. There are also several other vantage points within the Mauka Area that offer Mauka views of the Koolau Range and other significant views and vistas. These sites also best represent the urban character of the various neighborhoods and demonstrate the views in, around, and out of the Mauka Area. These noted vantage points are Ala Moana Beach Park, Mother Waldron Neighborhood Park Playground, McKinley High School Looking Ewa, and McKinley High School Looking Makai (Figure 3-9).

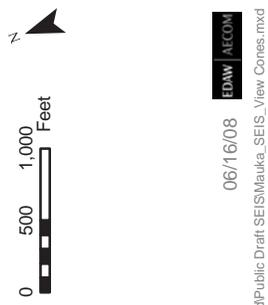
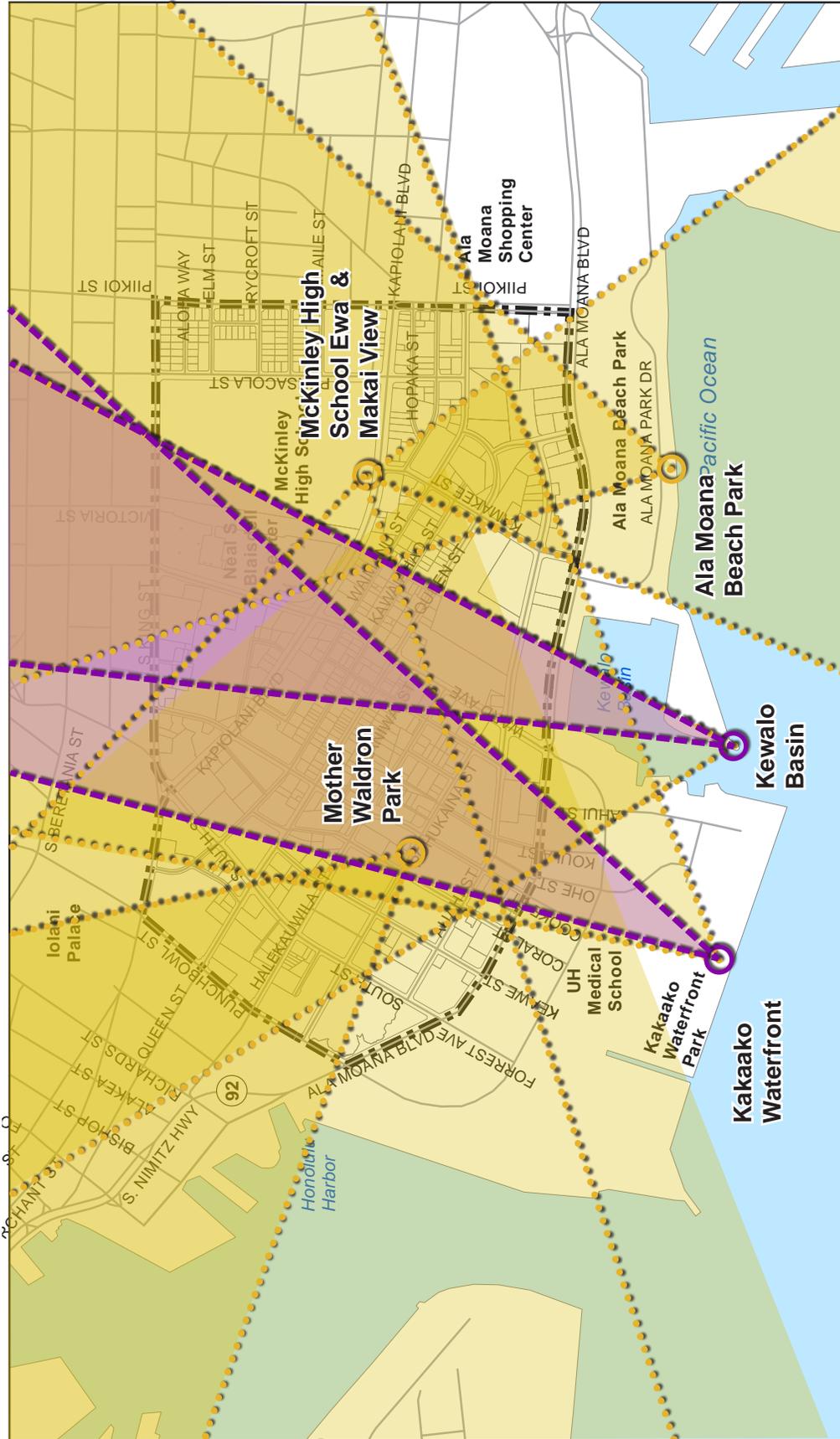


Figure 3-9 Mauka Area View Planes

-  Mauka Study Area
-  Mauka Parcels
-  View Planes
-  Vantage Points
-  City PUC Development Plan Identified View Planes
-  City PUC Development Plan Identified Vantage Points

SOURCE: PlanPacific, 2007; EDAW, 2008

06/16/08

EDAW ALCON

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Each of these vantage points is described and illustrated below, and the associated view planes are shown on Figure 2-4.

In the attached simulated panoramic view corridor exhibits, the human eye's natural 60 degree cone of vision is highlighted in true color. The 180 degree panorama is indicated as a screened back, lighter view outside the 60 degree cone of vision.

#### *Kakaako Waterfront Park*

The Kakaako Waterfront Park is one of the few open urban areas in Honolulu with a panoramic Mauka view of the Koolau mountain range, Punchbowl monument, and the urban skyline (Picture 3-15). This vantage point has two view corridors identified.

#### **Picture 3-15 Mauka View from Kakaako Waterfront Park**



The narrow view corridor seen in plan view is identified from the PUCDP. The wider view corridor extends to a 180 degree view plane (Figure 2-5). In addition, the panoramic view covers a 60 degree optical view cone simulating the eye's natural "cone of vision". The narrower corridor identified in the PUCDP, the 60 degree, and 180 degree panoramic views can be seen in Picture 3-16, Kakaako Waterfront Park - Existing Conditions. Approximately 70 percent of the existing panoramic view allows one to view the Koolau Range and Punchbowl Monument from Kakaako Waterfront Park. The tower elements are visible in the view of the Punchbowl Monument. There are a few high-rises spread out within the existing view plane.

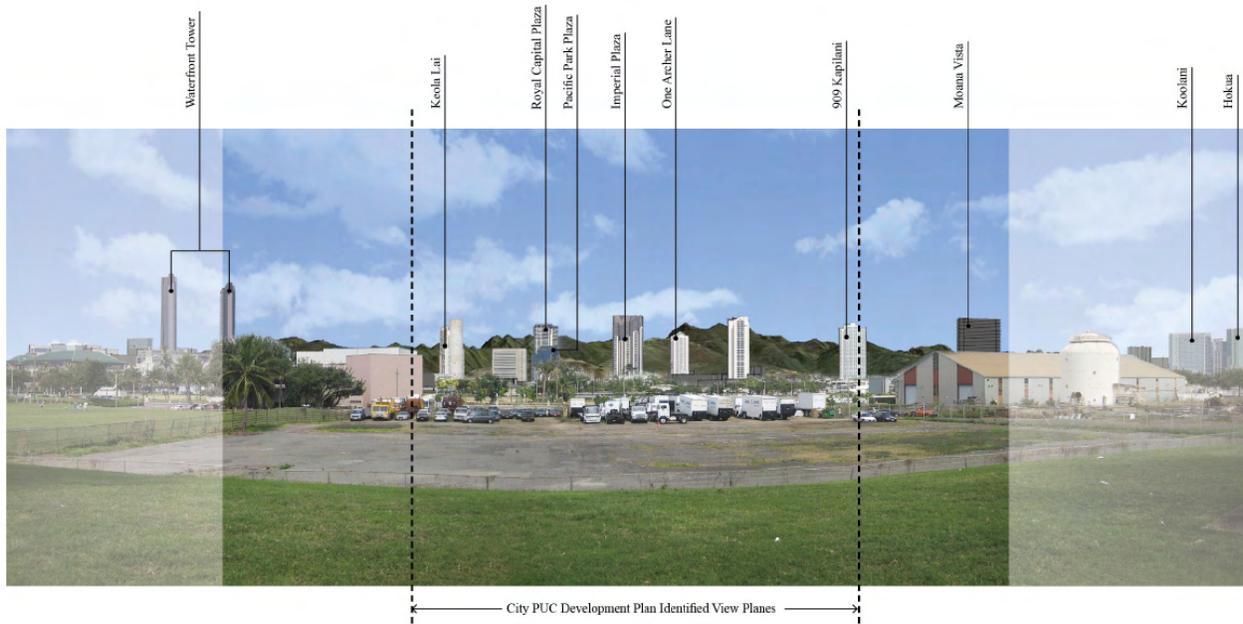
#### *Kewalo Basin*

This vantage point has two view corridors identified. The narrow view corridor seen in plan view is identified from the PUCDP. The wider view corridor extends to a 180 degree view plane (Figure 2-4). In addition, the panoramic view covers a 60 degree optical view cone simulating the eye's natural "cone of vision." The narrower corridor identified in the PUCDP, the 60 degree view, and the 180 degree panoramic views can be seen in Picture 3-17, Existing Conditions – Kewalo Basin. With Downtown, Ewa Beach, and the waterfront as the foreground, the Mauka view from Kewalo Basin is one of the most spectacular views in the Kakaako community. The majority of the Mauka views are still intact and the breadth of the view corridor encompasses several neighborhoods: the Civic Center, Central Kakaako, Pauahi, Kapiolani, and the Thomas Square.

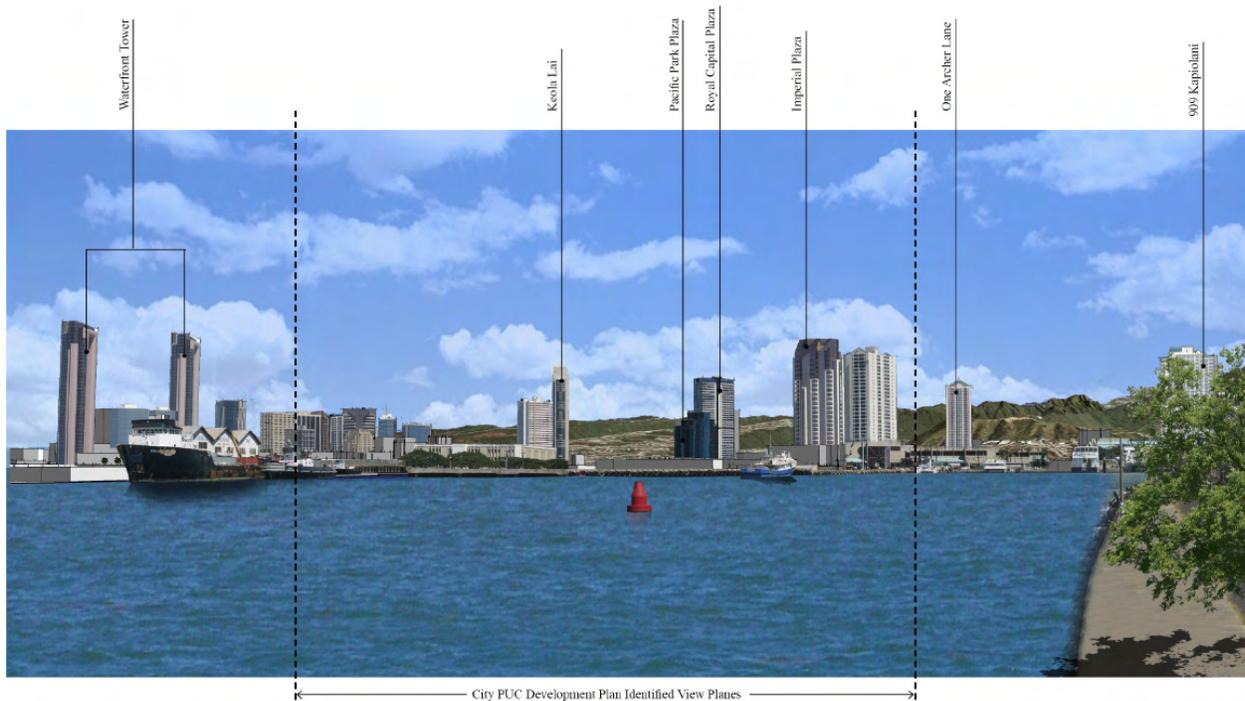
#### *Ala Moana Beach Park*

The Ala Moana Beach Park view corridor opens to the Auahi neighborhood. The view from Ala Moana Beach Park is characterized by the new high-rise development of Koolani, Hokua, and

Picture 3-16 Kakaako Waterfront Park Existing Condition

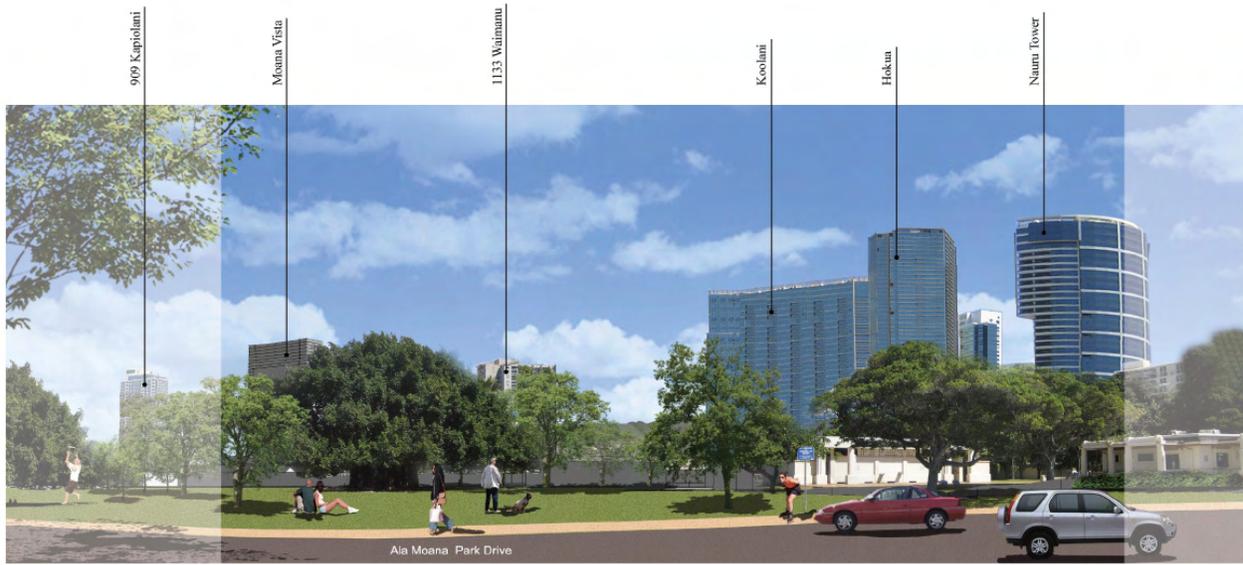


Picture 3-17 Kewalo Basin - Existing Condition



\*The view of the Kakaako District as seen from the Kewalo Basin is within standard 60 degree viewcone (human eye). Consequently, no portion of the image has been shaded.

Picture 3-18 Ala Moana Beach Park - Existing Condition



Picture 3-19 Mother Waldron Playground - Existing Condition



Picture 3-20 McKinley High School Looking Ewa - Existing Condition



Picture 3-21 McKinley High School Looking Makai - Existing Condition



Nauru Tower. The majority of the view of the Koolau Range is obstructed by these new high-rise developments (Picture 3-18).

#### *Mother Waldron Neighborhood Park Playground*

Mother Waldron Neighborhood Park Playground is in the Pauahi neighborhood. From the park, the Ewa view encompasses downtown and is defined by a prominent urban high density development skyline. Several adjacent parcels are high-rise developments, i.e., Waterfront Towers and Pohulani residential tower, and have re-shaped the skyline framing the view of the Downtown skyline. (Picture 3-19).

#### *McKinley High School Looking Ewa*

With Downtown at a far distance, the view from McKinley High School looking Ewa is dominated by the new high-rise developments in the Mauka Area, particularly the high-rise

developments along Kapiolani Boulevard. This view encompasses the Central Kakaako, Kapiolani, Pauahi, Thomas Square, and Civic Center neighborhoods (Picture 3-20).

#### *McKinley High School Looking Makai*

Similar to the view from Ala Moana Beach Park, the view from McKinley High School Makai is dominated by the new high-rise development on Kapiolani Boulevard, such as Koolani, Hokua, and Nauru Tower. These high-rises are in the Kapiolani, Central Kakaako, and Auahi neighborhoods (Picture 3-21).

### 3.10.2 Potential Impacts and Mitigations Measures

#### Parks and Open Space

The redevelopment and the gradual build-out of the Mauka Area projects a resident population of about 30,253 by 2030. Inasmuch as the Mauka Area is a built-out urban area facing certain redevelopment into even more intensive land use pattern of high density residential, commercial, and industrial uses, HCDA is likely unable to acquire additional land to meet the demand for additional park space. Therefore, combinations of strategies have been proposed under the draft Mauka Area Plan. To that end the draft Mauka Area Plan sets forth the following strategies:

- Optimize the use of vacant public land. A portion of the former Pohukaina School site has been designated to support a community room at the ground floor. As mentioned in Section 3.14 (Public Services and Facilities) Schools section, the remainder of this site can be used to meet the demands of an additional facility. In the event the site is not used for the development of a new school, the site then would be used for the expansion of the existing Mother Waldron Neighborhood Park Playground.
- Shared use of existing public recreation facilities. McKinley High School's campus contains the most significant publicly owned outdoor recreation facilities in Mauka Area, including softball courts, and baseball field, tennis courts, basketball and volleyball courts, and a football/soccer field surrounded by a track. While these facilities are used for the school's physical education and athletic programs, they are sometimes available

during evenings, weekends and summer months for general community use, with the prior permission of the schools' administration. A more formal joint school/community use arrangement, combined with improvement of the adjoining three and a half acre site, is the only practical option for making a wide range of active outdoor recreation facilities available to the public in the Mauka Area.

- Preserve existing parks and open spaces. As a centrally located urban district, the Mauka Area offers a wide array of places within walking or bicycling distance where residents can go for recreation, including expansive shoreline parks and inland public squares and campuses. Kakaako Waterfront Park, Ala Moana Regional Park and Kewalo Basin Park are located on the Makai end of the Districts. In addition, Thomas Square and Civic Center are the Mauka edge of the District and the adjoining campuses of McKinley High School and NBC are within the district itself.
- Encourage pedestrian connections to nearby public parks. The following streets are proposed to be improved to accommodate pedestrian and bicycle routes through Mauka Area. These tree lined streets would connect major parks within and outside of the District:
  - **Cooke Street** – a “green” street – borders Mother Waldron Neighborhood Park Playground and provides a connection from the Pauahi neighborhood to the entry to Kakaako Waterfront Park on the other side of Ala Moana Boulevard.
  - **Pohukaina Street** – a “green” street – runs adjacent to Mother Waldron Neighborhood Park Playground and links the Pauahi neighborhood to the Civic Center.
  - **Kamakee Street** – a “green” street – linked Auahi neighborhood to Ala Moana Regional Park, and to Thomas Square and the Young Street bikeway, via a proposed pedestrian / bicycle recreational path at the boundary between the campuses of McKinley High School and NBC.
  - **Piikoi Street**, which is designated for marked bicycle lanes, connects the Diamond Head end of the Mauka Area to Ala Moana Regional Park and Sheridan Community Park, just beyond the district boundary.
- Leverage private investments in parks and recreation facilities. Redevelopment of private properties presents opportunities to increase the availability of public open space and both indoor and outdoor recreation facilities for the use of neighborhood residents. Developers would be required to provide on-site recreational facilities for project residents. In addition to the recreational requirement, under the existing Mauka Area Rules, developers are required to dedicate public facilities in the amount of three percent of the total commercial and community service floor area of the development, exclusive of nursing facilities and assisted living facilities. Additionally, developers are required to dedicate four percent of the total residential floor area, exclusive of floor area devoted to reserved housing unit. If it is determined that dedicating land is not in the best interest of the public, the developer shall pay instead a fee in the sum equal to the fair market value

of the land area required. HCDA may expend the moneys for the purchase, creation, expansion, or improvement of public facilities, including parks and recreational facilities. To date, approximately \$3.38 million has been expended (or approved to be expended) from public facilities dedication fees for parks within the Mauka Area. Furthermore, HCDA has acquired approximately 98,000 square feet of land through public facilities dedication for the expansion of the Mother Waldron Neighborhood Park and Makai Gateway Park. Affordable and reserve housing projects by themselves often cannot accumulate extensive recreational amenities due to the initial construction cost, the reduction of marketable floor area, and the maintenance costs to the resident. Providing some recreational facilities on site would reduce the demand for facilities on public land.

Generally speaking, the quality and location of open space in urban settings is more important than the quantity and size. Hence, successful urban plazas and pocket parks would optimize the use of space by drawing people in, in an urban environment. Figure 2-4 suggests several locations for new plazas, near the intersections of Cooke Street and Ala Moana Boulevard, Ward Avenue and Auahi Street, and on Cooke Street across from Mother Waldron Neighborhood Park Playground.

The aforementioned strategies proposed by the Draft Mauka Area Plan would positively impact the Mauka Area. These strategies would earmark space as park and open space, create co-uses that will increase park and open space, preserve existing parks and open spaces, create tree lined streets that connect to major parks, and would require future redevelopments to create urban plazas and pocket parks.

In addition, the HCDA will consider increasing the recreational requirement for development projects. Under the existing Mauka Area Plan and Rules, all private residential projects with a development site of 20,000 square feet or more are required to provide 55 square feet of recreational space per dwelling unit. As a result of this requirement, 17 acres of private recreational space has been developed in the Mauka Area.

#### Visual Resources

The overall impact that the existing Mauka Area Plan, ~~and~~ Draft Mauka Area Plan, ~~and~~ a variation to the Draft Mauka Area Plan (third alternative analysis) would have on the visual resources in the Mauka Area are particularly related to urban form and its effect on the preservation of the Mauka Area's skyline view. The urban skyline, defined by the high rises and denser clustering of building in the Downtown area, is a visually prominent element from the Mauka Area. Integrating new development in a harmonious manner would serve to preserve the existing urban skyline view and visual assets. The goal of creating these controls is to preserve visual assets that are unique to Honolulu and Kakaako. Discussed below are the potential impacts of the existing Mauka Area Plan, ~~and the~~ Draft Mauka Area Plan, ~~and the~~ third alternative analysis assessed on the six selected vantage points.

The six vantage points selected for the Mauka Area would be impacted by both the existing Mauka Area Plan, ~~and the~~ Draft Mauka Area Plan, ~~and the~~ third alternative analysis assessed. However, the overall visual impact of the Draft Mauka Area Plan on building massing, height skyline, Koolau views, and the visual resources in the Mauka Area would likely be considerably lower than full build out under the existing Mauka Area Plan.

### *Kakaako Waterfront Park*

Under the existing Mauka Area Plan development, future maximum density development coupled with the allowed large tower footprint and building orientation would possibly result in the Mauka view becoming completely blocked within and outside of the PUCDP's view corridor. One or two visual pockets would be spared where a small portion of the Koolau Range would still be visible (Picture 3-22). From an urban skyline perspective, there would be no variation in height limits, resulting in a static "straight line" type of skyline.

On the other hand, the Draft Mauka Area Plan promotes smaller tower footprints and orients the longer side of towers in the Makai-Mauka direction resulting in more slender towers (Picture 3-23). The Draft Mauka Area Plan at maximum development would greatly increase the number of potential towers in comparison to the existing conditions. However, there would be substantially more views of the Koolau Range in comparison to the existing Mauka Area Plan. Also, the introduction of mid-rise elements in the Draft Mauka Area Plan would help to diversify the skyline and provide an urban image with multiple layers.

The third alternative analysis introduces a sliding scale of tower footprint, which encourages a variety of building profiles and skylines. The building height of the mid-height element is determined by the distance from the waterfront, so that more view corridors and windows to the Koolau Ranges can be preserved.

### *Kewalo Basin*

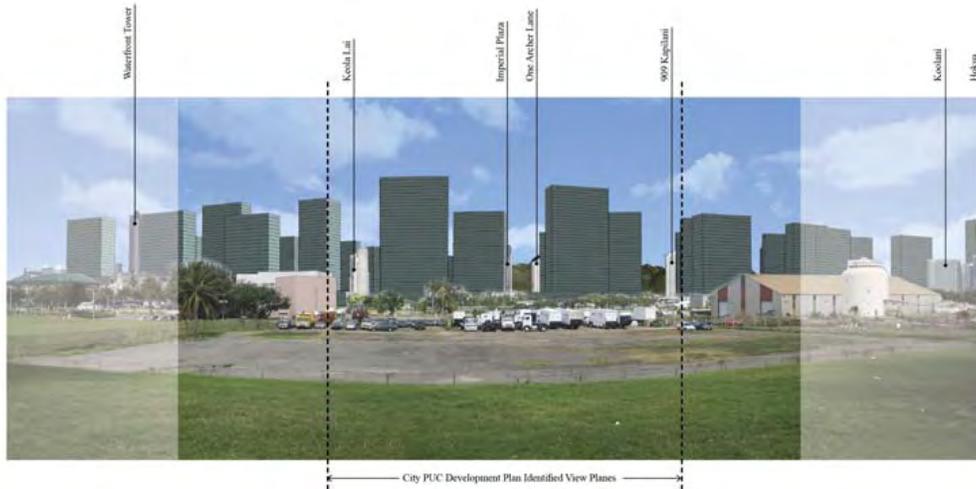
Under the existing Mauka Area Plan's development provisions, the maximum height of future development along Ala Moana Boulevard is 400 feet. If built out to full capacity, this would potentially create "a wall of towers" blocking most views of Downtown and the Koolau Range within and outside of the PUCDP's view corridor (Picture 3-24). Unlike the other simulated panoramic view corridor exhibits, Pictures 3-24 and 3-25 show only the eye's natural 60 degree cone of vision. This simulated panoramic view does not include a view cone larger than 60 degree as it does not provide any context to the view corridor. The left side of scene would include more ocean, and right-side views are blocked by tree canopy.

Under the Draft Mauka Area Plan, future development towers would be less prominent in the skyline because of the Makai-Mauka orientation of the towers and skinny tower footprint (Picture 3-25). Although most views of Downtown would still be impacted, the Draft Mauka Area Plan preserves a greater portion of the Koolau Range views. The third alternative balances waterfront development with the preservation of Mauka-Makai views.

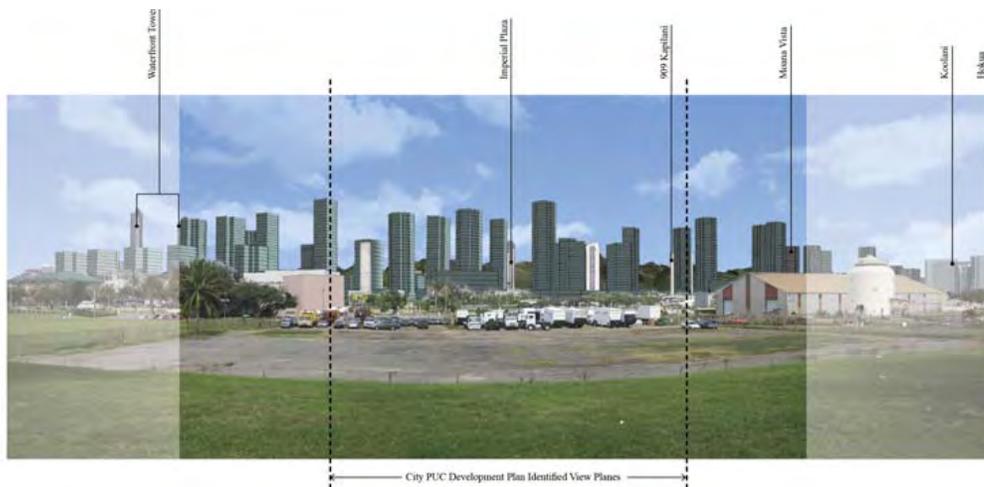
### *Ala Moana Beach Park*

Under the existing Mauka Area Plan, continued construction of high-rise tower-elements will very likely completely block the views of the Koolau Range from the Ala Moana Beach Park (Picture 3-26).

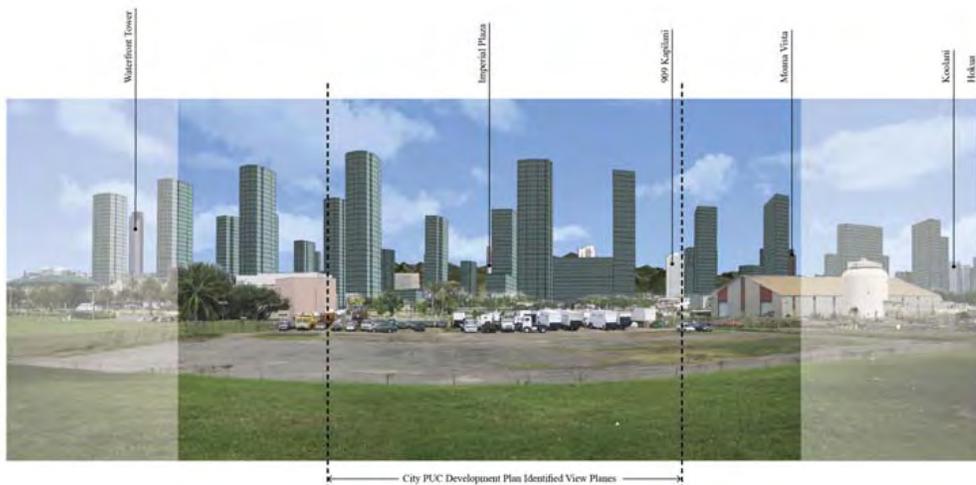
Picture 3-22 Kakaako Waterfront Park - “No Action” Scenario



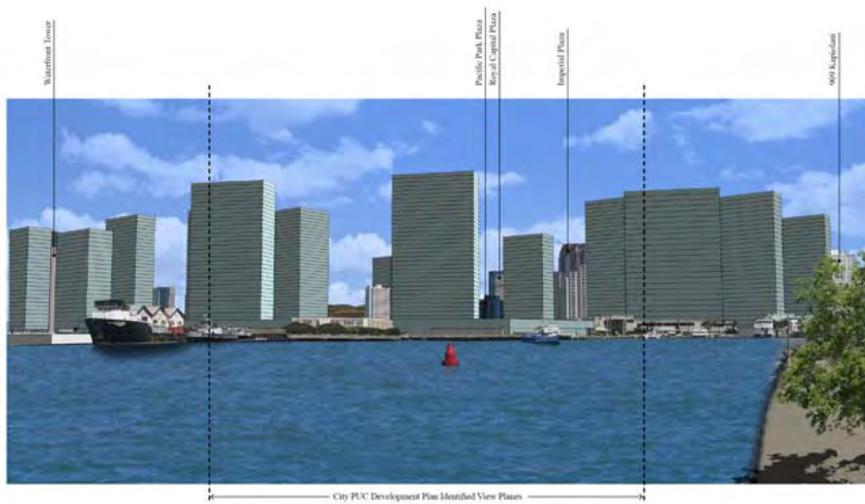
Picture 3-23 Kakaako Waterfront Park - “Draft Mauka Area Plan” Scenario



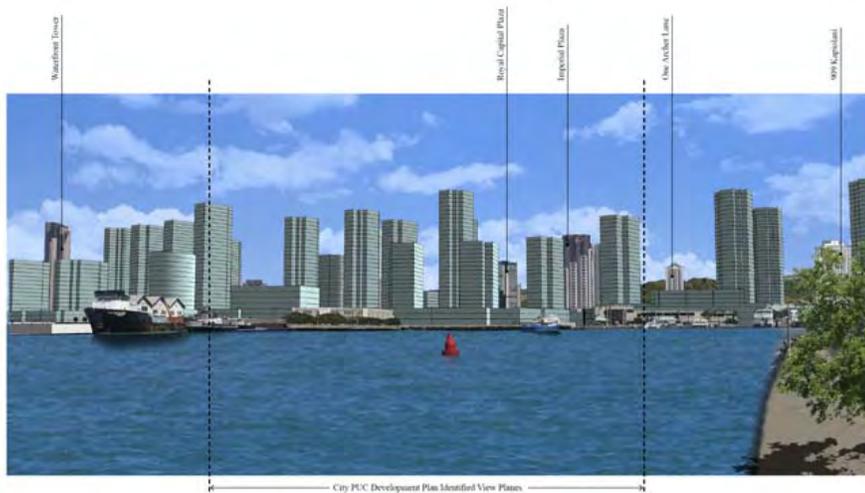
Kakaako Waterfront Park - “Third Alternative Analysis” Scenario



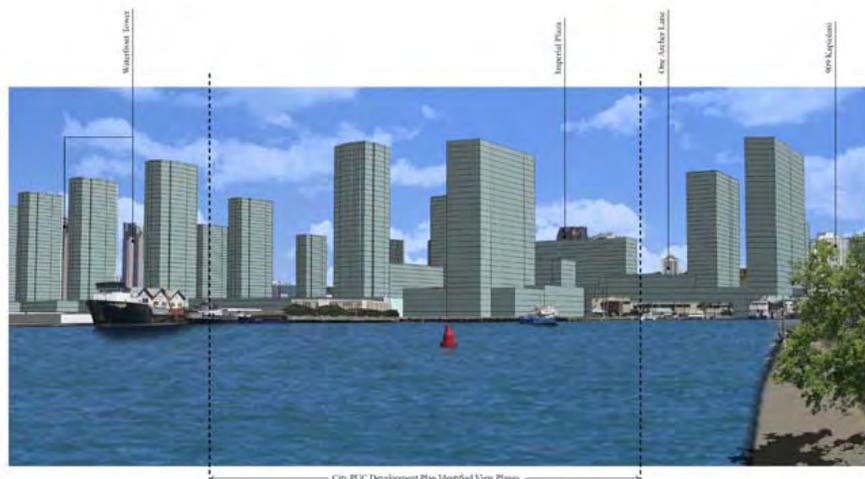
Picture 3-24 Kewalo Basin - “No Action” Scenario



Picture 3-25 Kewalo Basin - “Draft Mauka Area Plan” Scenario



Kewalo Basin - “Third Alternative Analysis” Scenario



Under the Draft Mauka Area Plan, the massing of future development would be minimized to create more opportunities for the preservation of the view corridor (Picture 3-27). The mid-rise buildings along Ala Moana Boulevard would provide a smooth transition--from the urban edge to the open space Makai of Ala Moana Boulevard, thereby preserving more of the view corridor. The adoption of the Special Design Review Zone proposed in the third alternative analysis would continue to reinforce the features of the Draft Mauka Area Plan by subjecting the properties bordering the Mauka and Makai Areas (i.e., Ala Moana Boulevard) to discretionary design reviews.

#### *Mother Waldron Neighborhood Park Playground*

Future development under the existing Mauka Area Plan's guidance would potentially further clutter the towers until they completely block the views of the downtown skyline (Picture 3-28). Also, the orientation of the proposed 400-foot tower-elements will create a "wall" around the playground as the face of the tower-elements would front the views from Mother Waldron Neighborhood Park Playground.

Under the Draft Mauka Area Plan, smaller building footprints and mid-rise option will decrease the overall perceived mass of buildings, thus create more views of the downtown skyline between buildings (Picture 3-29). The third alternative analysis introduces mid-height element that provides an alternative development scale with consideration of view preservation.

#### *McKinley High School Ewa View*

Future development under the existing Mauka Area Plan will result in all towers with a large footprint oriented Ewa-Diamond Head. An example of such tower is the Moana Vista Tower (Picture 3-30). This continued style of development will result in an increase of 400-foot tall tower-elements that will create a visual "wall" effect that blocks most of views on Ewa side of the development.

The Draft Mauka Area Plan would be an improvement over the existing Mauka Area Plan by providing a mix of mid-rise and high-rise buildings that enriches the skyline by adding vertical and horizontal layers that leads to more articulated architectural images (Picture 3-31). Similar to the Draft Mauka Area Plan, the third alternative analysis proposed difference in tower orientation and visual quality of the towers to create a more varied skyline.

#### *McKinley High School Makai View*

The existing Mauka Area Plan would add more towers creating the vertical "picket fence" and "wall" affect, resulting in an abrupt transition from high-rise to open space (Picture 3-32).

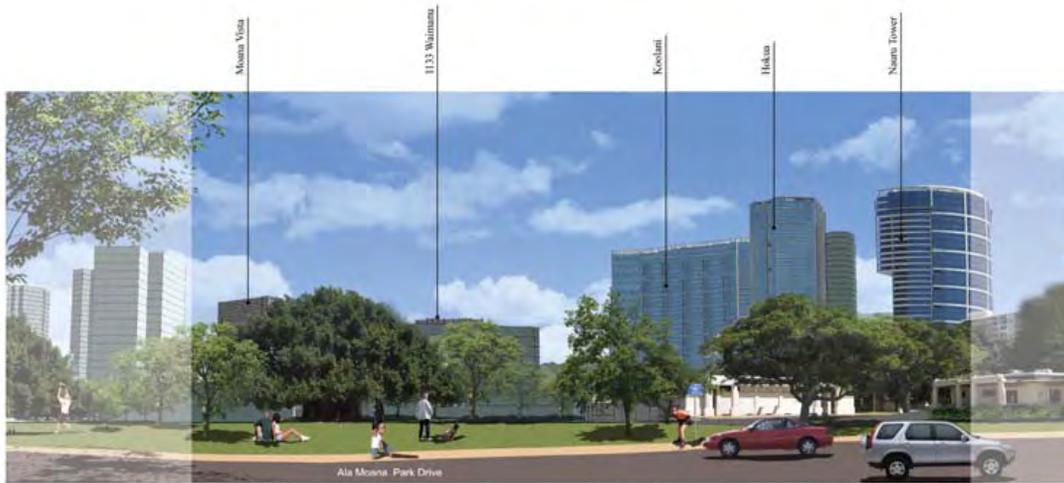
The Draft Mauka Area Plan introduces the mid-rise element and establishes an emphasis on the street elements thus, providing a more dynamic skyline and a more smooth scaled transition between the tower elements and the pedestrian street- level elements (Picture 3-33).

The strategies proposed by the Draft Mauka Area Plan will positively impact the visual resources in the Mauka Area. As previously stated, the recommended urban design modifications promote smaller tower footprints minimizing the "wall" effect seen in the Auahi neighborhood,

Picture 3-26 Ala Moana Beach Park - “No Action” Scenario



Picture 3-27 Ala Moana Beach Park - “Draft Mauka Area Plan” Scenario



Ala Moana Beach Park - “Third Alternative Analysis” Scenario



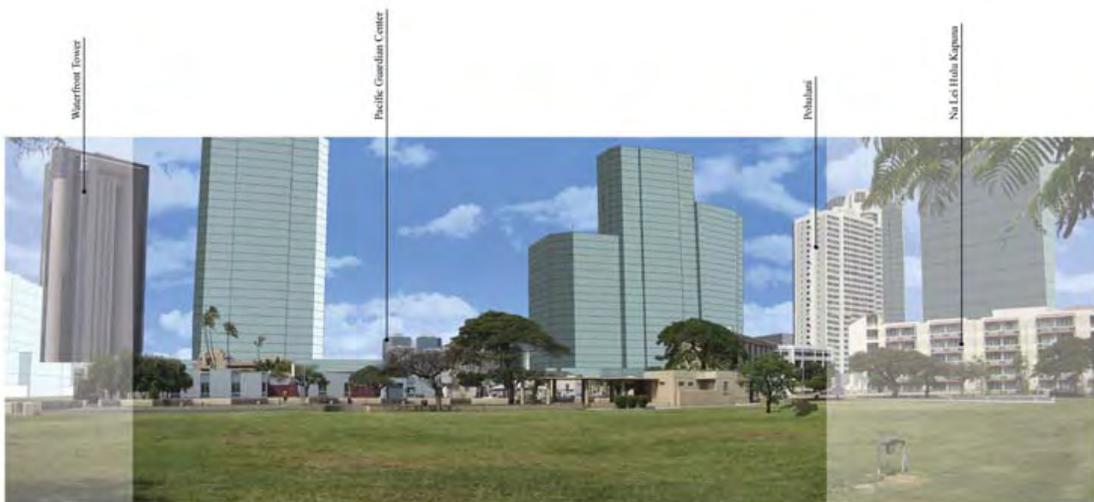
Picture 3-28 Mother Waldron Playground - “No Action” Scenario



Picture 3-29 Mother Waldron Playground - “Draft Mauka Area Plan” Scenario



Mother Waldron Playground - “Third Alternative Analysis” Scenario



Picture 3-30 McKinley High School Looking Ewa - “No Action” Scenario



Picture 3-31 McKinley High School Looking Ewa - “Draft Mauka Area Plan” Scenario



McKinley High School Looking Ewa - “Third Alternative Analysis” Scenario



Picture 3-32 McKinley High School Looking Makai - “No Action” Scenario



Picture 3-33 McKinley High School Looking Makai - “Draft Mauka Area Plan” Scenario



McKinley High School Looking Makai - “Third Alternative Analysis” Scenario



minimizes the skylines view obstruction of the Koolau Range, diversifies the skyline with a mix of low-rise and high-rise tower elements, and minimizes abrupt transitions from the skyline to urban open spaces. Both the Draft Mauka Area Plan and the third alternative analysis introduce the mid-height element and establishes an emphasis on the street-front elements, thus providing a more dynamic skyline and a much more subtle scale transition between tower elements and pedestrian street level elements.

#### Analysis of Height Reduction along Ala Moana Boulevard

The Draft Mauka Area Plan proposes to reduce the maximum allowable tower heights along Ala Moana (between Punchbowl Street and Kewalo Basin) from 400 feet under the existing Mauka Area Plan to 100 and 200 feet under the Draft Mauka Area Plan. The impact of the proposed height reduction by 50 to 70 percent is analyzed using the following urban design criteria: view impact, urban form, legibility and urban identity, and pedestrian experience. A summary of the major findings are:

##### *View Impact*

Under the existing Mauka Area Plan, future development along Ala Moana would affect the views from Kakaako Waterfront Park and Kewalo Basin. Both views are identified as important view corridors to the Mauka Area by PUCDP. With building height restrictions of 100 feet and 200 feet, the views would be improved by implementing the Draft Mauka Area Plan in several ways:

- Preservation of view corridors: View “windows” would be created through the employment of 100-foot and 200-foot buildings, thus increasing the visibility of the Koolau Range.
- Create a diverse multiple layer skyline: The 100-foot and 200-foot building heights enable a different building typology; the architectural design under such height restrictions would bring variety to the skyline. From an aesthetic standpoint, the variations in typology provide a mechanism for creating visual texture and a dramatic frame around preserved views.
- Provide a smooth scale transition from high density urban development to open space: Two major regional open spaces are located adjacent to the Mauka Area, Kewalo Basin and Ala Moana Beach Park. Mid-rises would provide a scaled transition from tower elements that serve as landmarks to these open spaces, and to a more intimate pedestrian scale that provides a comfortable walking experience along the waterfront and park.

Recognizing that Ala Moana Boulevard serves as a transportation corridor and a major scenic drive that showcases Kakaako’s unique urban waterfront skyline, Special Design Review Process Zone is proposed to ensure any tower elements planned would enhance the urban design framework in the Mauka Area. Project review criteria include: visual access to the ocean, encouraging and preserving pedestrian access to the Makai Area, and creating nodes of activities and gateways at street corners would be considered.

### *Urban Form*

The blocks along Ala Moana average 250 to 275 feet deep. This relatively shallow lot size is more conducive to medium-scale development. The solution provided in the Draft Mauka Area Plan preserves the neighborhood scale and creates a more appealing pedestrian environment. By employing a lower tower-element height restriction and encouraging mid-rise development, the Draft Mauka Area Plan allows the future development to achieve maximum FAR without the presence of 400-foot towers. If implemented, the mid-rise-oriented development not only captures the premier of those blocks' strategic location, but also would help to preserve Mauka-Makai view corridors, enhance existing neighborhood form, and create a more walkable neighborhood.

Construction of 400 foot towers, as allowed in the existing Mauka Area Plan, could be feasible with parcel consolidation and block reconfiguration. In that scenario, the suggested development strategy would be to break up the "superblocks" into smaller linear lengths at a pedestrian level to allow visual and physical connections penetrating the required massing. Another design strategy would be to orient the building in a Mauka-Makai configuration to allow some views to be maintained.

The third alternative analyzed continues to preserve the urban form with small-scale development patterns introduced from the Draft Mauka Area Plan. Moreover, the third alternative proposes a more mixed development pattern, where small and large blocks can be integrated with subtle transition, and provide a more pedestrian-friendly environment.

### *Legibility and Urban Identity*

Ala Moana Boulevard has a high volume of traffic; because of this, development is highly visible along the corridor by those driving through the Mauka Area. The widespread 400-foot towers allowed throughout the Mauka Area under the existing Mauka Area Plan, would make it difficult to create a distinct and unique urban image of the Mauka Area. The Draft Mauka Area Plan decreases the maximum allowable tower-element height from 400 feet to the proposed 100 feet and 200 feet, which would create a visible contrast in scale, distinct urban character, and a sense of arrival to the Mauka Area. In addition the strategic and judicious clustering of the 400' tower elements could allow some of the major view corridors to be maintained, such as the one from the Kewalo Basin and the Kakaako Waterfront Park

To further enhance the urban identity of the area, detailed and strategic urban design can be added. Features include identifying community gateways that create a sense of arrival—the creation of gathering places and community cores with local features and celebrating key landmark buildings through architectural, landscape, and spatial treatments. Visual access to the ocean, preserving and encouraging pedestrian access to the Makai Area, and activity nodes and gateways at street corners would be used as guidance to review process. The third alternative analysis introduces Special Design Review Zone along Ala Moana Boulevard, subjecting parcels and blocks to discretionary review process to ensure that development along Ala Moana Boulevards would enhance the Mauka Area's urban design framework. Blocks and parcels at critical nodes would be subject to discretionary design review and be allowed flexibility in floor plate or building height to achieve the goal of creating meaningful and legible urban nodes.

### *Pedestrian Experience*

Existing conditions on Ala Moana Boulevard are generally not conducive to pedestrian activity; as such, the pedestrian experience is limited. Sidewalks on long segments of the Mauka side of Ala Moana Boulevard have little to no shade trees or other forms of relief from the sun. In the context of urban design form, some new developments have taken the form of “white boxes” and car dealerships separating the pedestrian from store fronts by way of parking lots aiding in the deactivation of the pedestrian experience. Hence, there are a vast number of opportunities to improve the pedestrian experience along Ala Moana Boulevard particularly by creating pedestrian scaled development, activating the sidewalk experience, and regulating urban design form to maximize visual interest at the street level.

The shadow analysis on the two scenarios also shows that the Draft Mauka Area Plan will have less day-time shadow impact (Picture 3-35) than would by the existing Mauka Area Plan (Picture 3-34). Contrary to the existing Mauka Area Plan that focuses the pedestrian activities on the 45-foot deck level, the Draft Mauka Area Plan proposes mixed use street-front elements that can enrich the pedestrian experience at street level. The 100 foot and 200 foot buildings would create shorter shadows and have less impact on Ala Moana Beach Park and Kewalo Basin waterfront. Active pedestrian streets will provide the opportunity to link open space to the urban fabric. The third alternative analyzed further expands the application of street-front element and encourages the linkage between the height of street-front element with street classification and character where it is located so that a comfortable pedestrian-scale could be achieved. For example, on a small street, measuring approximately 50 feet wide, with primarily residential uses, the street-front element can be as low as 40 feet—a typical three-story townhouse—to create a quiet and comfortable residential neighborhood character. On a wider street (approximately 100 feet wide) with mixed-use development, the street-front element can be as high as 65 feet.

**Picture 3-34 Shadow Impact - the Existing Mauka Area Plan**

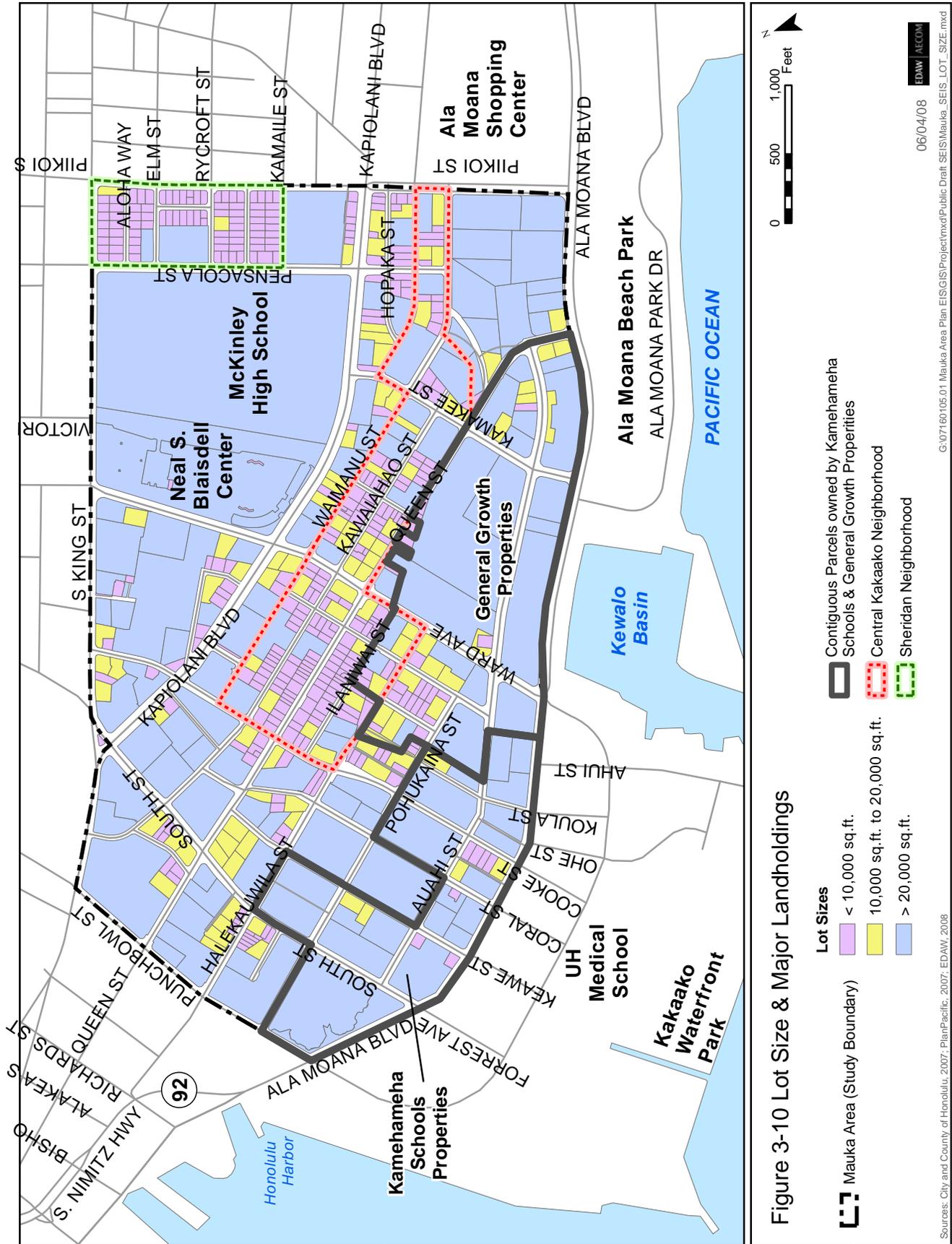


**Picture 3-35 Shadow Impact - the Draft Mauka Area Plan**



**Shadow Impact - the Third Alternative Analysis**





## 3.11 Landholdings and Land Use

### 3.11.1 Affected Environment

#### Landholdings

As shown in Figure 3-10, the Mauka Area encompasses a total of approximately 450 acres, of which approximately 90 acres are owned by the State and the City and County of Honolulu are comprised of government buildings, schools, cultural facilities, and parks. Utility companies own approximately 14 acres of land, with the remainder, and majority of lands in private ownership. KS and GGP own approximately 51 acres and 60 acres, respectively. In 2004, KS prepared a strategic plan for its Kakaako lands. The strategic plan calls for two key initiatives: developing life science facilities in the Makai Area; and developing a mixed-use “urban village” in the Mauka Area that would be primarily residential, augmented by retail stores, live-work spaces, and offices. Acquired in 2004, GGP manages lands formerly owned by Victoria Ward Ltd. In April 2008, GGP submitted a master plan for its land holdings in Kakaako for approval by HCDA. Similar to KS, the GGP plan proposes a gradual transition to a primarily mixed-use, urban village setting.

In addition to these two major landowners, the Mauka Area is also made up of numerous small lots, defined to be lots up to 20,000 square feet in size. There are nearly 200 small lots in the Central Kakaako alone, which are predominantly occupied by service and light industrial businesses. Landowners within the Central Kakaako area encounter various issues including: limited redevelopment potential, property tax increases, homeless population in Central Kakaako, lack of infrastructure (flooding and drainage), lack of on-street or regional parking for employees and customers, traffic congestion, multi-jurisdictional conflicts, and impacts relating to Improvement Districts.

The Sheridan Tract bordered by Pensacola, King, and Piikoi Streets contains approximately 90 small lots, most of which are single and multi-family residential units. There is also a ceded property, or former “Crown Lands”, under the care of the Office of Hawaiian Affairs (OHA) in the Makai Area of the KCDD.

#### Land Use – Existing – Existing Mauka Area Plan

Existing land use designations under the current Plan are shown in Figure 3-11. Notable components of the existing Mauka Area Plan are described below.

The existing Mauka Area Plan allows for a mixture of industrial, commercial, and residential uses in the same area, with the intent that people may live close to places of employment, shopping, and services. A typical building within the Mauka Area would be designed so the ground floor would be light and service industrial, some commercial, and parking. Commercial uses and parking would occupy the next two to four floors and a residential and commercial uses would utilize the upper floors. An elevated pedestrianway system would connect the decks of private developments and public parking garages at the 45-foot height level. General development provisions include a 45-foot building height limit and a maximum FAR of 1.5. Greater heights and FAR may be granted with the approval of a PD permit, which seeks to achieve public objectives (such as reserved housing) with additional floor area and height

incentives. To maximize development potential, the existing Mauka Area Plan encourages lot consolidation of small lots into superblock parcels. To facilitate lot consolidation, streets that are not necessary to provide access may be closed.

Most PD projects are encouraged to have common structural features consisting of platforms, decks, and towers. Platforms are buildings limited to a 45-foot height; decks are platform roofs; and towers are tall and relatively slender buildings on top of or abutting decks. Street setbacks are established to preserve view corridors along major streets. Decks are intended to be landscaped and provide space for leisure and passive recreation. Convenience and retail stores with daycare and other public facilities may be located on the decks.

#### *Land Use –Draft Mauka Area Plan*

Similar to the existing Mauka Area Plan, the land use component of the Draft Mauka Area Plan continues to uphold HCDA’s goal of fostering a pedestrian-oriented community where people can live, work, and play in close proximity. Notable changes to the land use designations include: the absence of MUZ-RA and MUZ-C designations. Additionally, standalone uses are permitted. Figure 2-1 shows the proposed land use designations under the Draft Mauka Area Plan.

Under the Draft Mauka Area Plan, the existing platform-deck-tower configuration has been modified as Street-Front, Mid-Height, and Tower Elements, favoring staggered structures that allow the maximum heights of 65 feet, 80 to 215 feet, and up to 400 feet, respectively. Absent from this revision is the Park-at-Grade (PG) use, which was eliminated in an earlier Mauka Area Plan amendment, and the associated elevated pedestrianway features. The maximum tower floor plate allowed is reduced to 9,000 square feet, and must fit within a rectangular envelope. The Mauka-Makai dimension must be greater at least as long, but no greater than three times the length of the Ewa-Diamond Head dimension. The orientation of the towers must conform to the Mauka-Makai orientation to minimize the obstruction of view. In addition to streets that provide view corridors, view cones such as those designated by the PUCDP would be used as tools for view assessments.

Properties are allowed to develop to a maximum FAR of 3.5, with the following exceptions: in Sheridan Neighborhood, all lots other than those that front King Street will have a maximum FAR of 2.0 to reflect the residential use pattern and building scale of the neighborhood; and, in areas where infrastructure has not been upgraded pursuant to an improvement district and/or where streets do not meet the proposed standards in the Mauka Area Plan, the maximum FAR will remain 1.5. With the infrastructure upgrade, the FAR may be increased to 3.5.

To promote active uses at street level and human-scaled building forms, building form guidelines are organized into three elements: the Street-Front Element, the Mid-Height Element, and the Tower Element. The maximum heights allowed for the street-front, mid-height, and the tower elements are 65 feet, 80 to 215 feet, and 400 feet (100 foot sections along Ala Moana Boulevard fronting Kewalo Basin and 200 feet along Ala Moana Boulevard between Punchbowl and Quinn Lane).

### Land Use – Third Alternative Analysis

The land use designation under the third alternative analysis continues to remain the same as the Draft Mauka Area Plan. The distinguishing features from the Draft Mauka Area Plan include: density transfer toward larger parcels, increasing the mid-height element to 250 feet, the application of the Special Design Review Process Zone for developments proposed on Ala Moana Boulevard, and floor plates corresponding to lot sizes—ranging from 8,000 square feet floor plate on a lot measuring less than 40,000 square feet to 16,000 square feet floor plate on a lot measuring greater than 160,000 square feet.

#### 3.11.2 Potential Impacts and Mitigation Measures

For large landowners, the implementation of the Draft Mauka Area Plan would restrict the ability to construct massive tower elements due to the floor plate reduction and the changed floor plate to accommodate Mauka-Makai views. However, the new Mid-Height Element, ranging from 80 to 215 feet in height atop the Street-Front Element (allowed up to 65 feet), accommodates even greater amount of floor area than the existing deck element. The orientation of the longer façade of building to be Mauka-Makai is proposed to preserve the natural view resource to be enjoyed by the greatest number of residents and visitors within and outside of the Mauka Area.

For small lot landowners (excluding Sheridan Neighborhood residential lots), the implementation of the Draft Mauka Area Plan would mean the ability to upgrade the existing infrastructure to facilitate better functioning of their uses. This opportunity has a pronounced effect on many small lot owners in the Central Kakaako neighborhood where essential public improvements are absent. An example would be Central Kakaako streets lacking drainage, resulting in ponding and flooding. The infrastructure upgrade would allow for the landowners to realize the 3.5 FAR to expand their existing uses. HCDA plans to include proposals to assist small businesses and landowners to successfully take advantage of expanding their existing uses and State-funded infrastructure upgrades. The overall strategy for Central Kakaako is to support viability of small businesses while allowing for potential future reuse of small properties through selective improvements to streets and parking. The intent is to minimize disruption and displacement of existing businesses. Through various community meetings with Central Kakaako businesses and landowners, various future development scenarios were explored. Scenarios include: (1) no change; (2) single use – industrial only; (3) industrial mixed-use – no residential use; and (4) commercial mixed use. Other alternatives include non-standard street improvements that may not conform to the City and County of Honolulu would be conducive to the existing use of the area.

Implementation of the Draft Mauka Area Plan would enable existing uses, such as commercial and industrial uses present in the Central Kakaako neighborhood, to be improved and enhanced to maintain their viability in the Mauka Area. It is also likely to facilitate new development on or around these existing uses. Since most lots are currently in use, developments, especially large projects are likely to result in tear down-rebuild scenarios, which would result in the displacement of current users and activities. Displaced activities would be relocating to appropriate, more compatible areas adjacent to similar uses. Because displacement would be necessary for redevelopment in the Mauka Area, the timing and phasing of the transition will be critical in terms of mitigation.

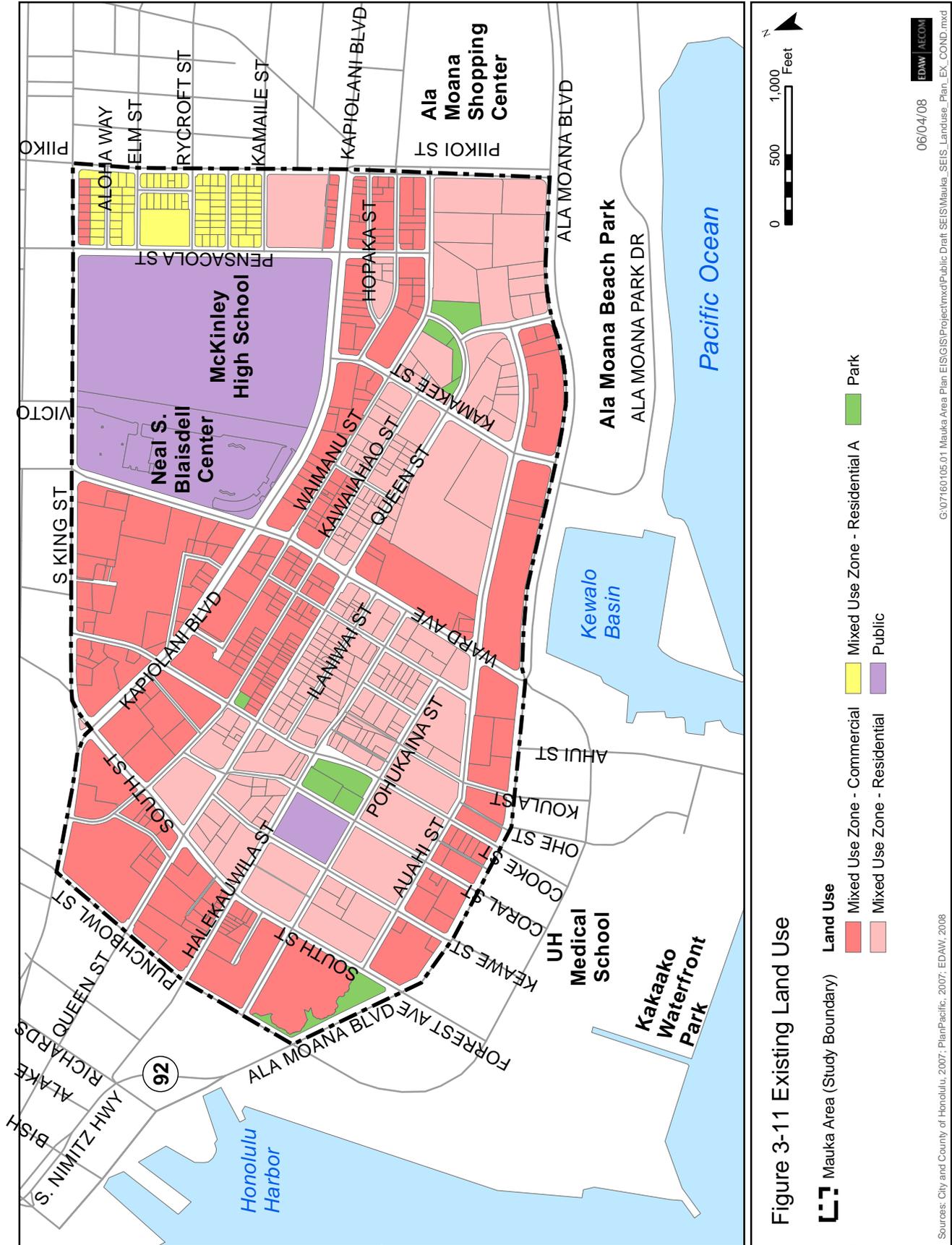


Figure 3-11 Existing Land Use

- Mauka Area (Study Boundary)
- Mixed Use Zone - Commercial
- Mixed Use Zone - Residential A
- Mixed Use Zone - Residential
- Public
- Park

Sources: City and County of Honolulu, 2007; PlanPacific, 2007; ED&AW, 2008  
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Implementation of the land use components of the Draft Mauka Area Plan in the long-term would result in the increase of residential and commercial uses, and the preservation of industrial uses. The mix of different uses in close proximity continues to uphold HCDA's longstanding goal of creating and sustaining a pedestrian-oriented community. Large landowners are able to take advantage of the new structure configuration while assisting HCDA's goal to preserve the Mauka-Makai view to be enjoyed by greater number of population. Small landowners can take advantage of expanding their existing uses and State-funded infrastructure upgrades, thereby improving the quality of their uses. While displacement may be necessary, the inconvenience caused to the affected persons and the uses are anticipated to be short-term. Therefore, the proposed land use does not pose potential impacts to the affected environment, and as such, no mitigation measures are proposed.

## 3.12 Social and Economic Characteristics

This section describes the existing social and economic conditions specific to the Mauka Area. Population information in this section is based on Traffic Analysis Zone (TAZ) data, produced by DPP for 2000 and 2030. DPP is the agency responsible for developing the regional growth forecasts for the City and County of Honolulu. The TAZ projections are used as the basis of analysis for population, housing, and employment within the City and County of Honolulu.

### 3.12.1 Affected Environment

#### Population, Housing, and Employment

The Mauka Area is located in the City and County of Honolulu, and is part of one of eight planning regions areas that comprise the island of Oahu. As of 2000, Oahu population was estimated at 846,156 residents (Table 3-12). The population projection for the year 2030 for the island is an estimated 1.11 million residents, representing a 32 percent increase between 2000 and 2030. In 2000, the Mauka Area population was estimated to be 6,180 residents. It is anticipated that 30,253 residents will be living in the Mauka Area by 2030, representing a growth rate of approximately 390 percent (Table 3-12). Figure 3-12, illustrates the projected population increases within the Mauka Area from 2000 and 2030.

**Table 3-12 Population, Housing, and Employment – 2000 and 2030**

	2000	2030	Amount Increase	Percent Change
<b>Population</b>				
Oahu	846,156	1,117,322	271,166	24
Mauka Area	6,180	30,253	24,073	390
<b>Housing</b>				
Oahu	315,988	429,045	113,057	36
Mauka Area	4,253	20,667	16,414	386
<b>Employment</b>				
Oahu	501,131	632,711	131,580	26
Mauka Area	25,604	35,338	9,734	38

Source: DPP, 2007

Island-wide housing in 2000 was estimated at 315,988 housing units. Island-wide housing growth projections for 2030 are an estimated 429,045 housing units representing a 36 percent

increase between 2000 and 2030. In 2000, the Mauka Area housing units was estimated to be 4,253 housing units. It is anticipated that the Mauka Area housing stock would increase to 20,667 housing units between 2000 and 2030, representing a growth rate of approximately 386 percent (Table 3-12). Figure 3-13, displays where the projected housing would likely occur in the Mauka Area from 2000 and 2030.

The Oahu civilian labor force in 2000 totaled approximately 501,131 persons, including 37 percent in the service industry and 19 percent in the retail sector, respectively. Employment projections for 2030 estimate a total of 632,711 jobs on Oahu, representing an overall increase in employment by approximately 21 percent between 2000 and 2030 (Table 3-12). In 2000, the Mauka Area civilian labor force, including 26 percent in the service industry and 24 percent in the retail sector, respectively. Mauka Area employment projections for 2030 are estimated at 35,338 jobs, representing a 38 percent increase (Table 3-12). Figure 3-14 shows where the employment is likely to occur in the Mauka Area between 2000 and 2030.

### Economic Conditions

The size of the land parcels and concentrations of land ownership has had a strong influence on the redevelopment of the Mauka Area. Land ownership consists of both private and public-owned lands: State of Hawaii and City and County of Honolulu own approximately 90 acres of land in the government buildings, schools, cultural facilities and parks. Private land ownership is comprised of 346 acres of land.

The Mauka Area's central location between downtown Honolulu and Waikiki is likely to continue to see an increase in area property values, which in turn is likely to cause redevelopment within the area. This is forecast to increase the amount of mixed use residential and commercial floor space over the next several decades. Current businesses vary considerably, ranging from smaller service-based businesses (e.g., automobile shops, warehousing, small goods manufacturing) to larger retail commercial businesses. The commercial retail establishments tend to be concentrated along the major roads, while the smaller service establishments are concentrated in the Central Kakaako neighborhood.

Equally important to the future of the Mauka Area are the small parcel neighborhoods, defined as groups of small parcels of land less than 20,000 square feet in size and owned by individual landowners. Small parcel neighborhoods are concentrated in two areas:

- The Central Kakaako area contains approximately 200 small lots predominantly occupied by smaller service-based businesses. Streets within the Central Kakaako area are generally unimproved and lack storm drains and other utilities. Nevertheless, regardless of the physical limitations, Central Kakaako property owners and business owners would generally prefer to stay where they are.
- The Sheridan Neighborhood is bordered by Pensacola, King and Piikoi Streets and is comprised of approximately 90 small lots, which are generally single family and multi-family residential units.

### 3.12.2 Potential Impacts and Mitigation Measures

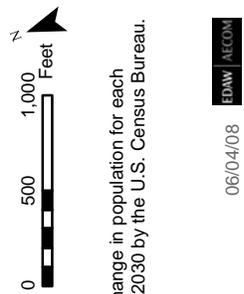
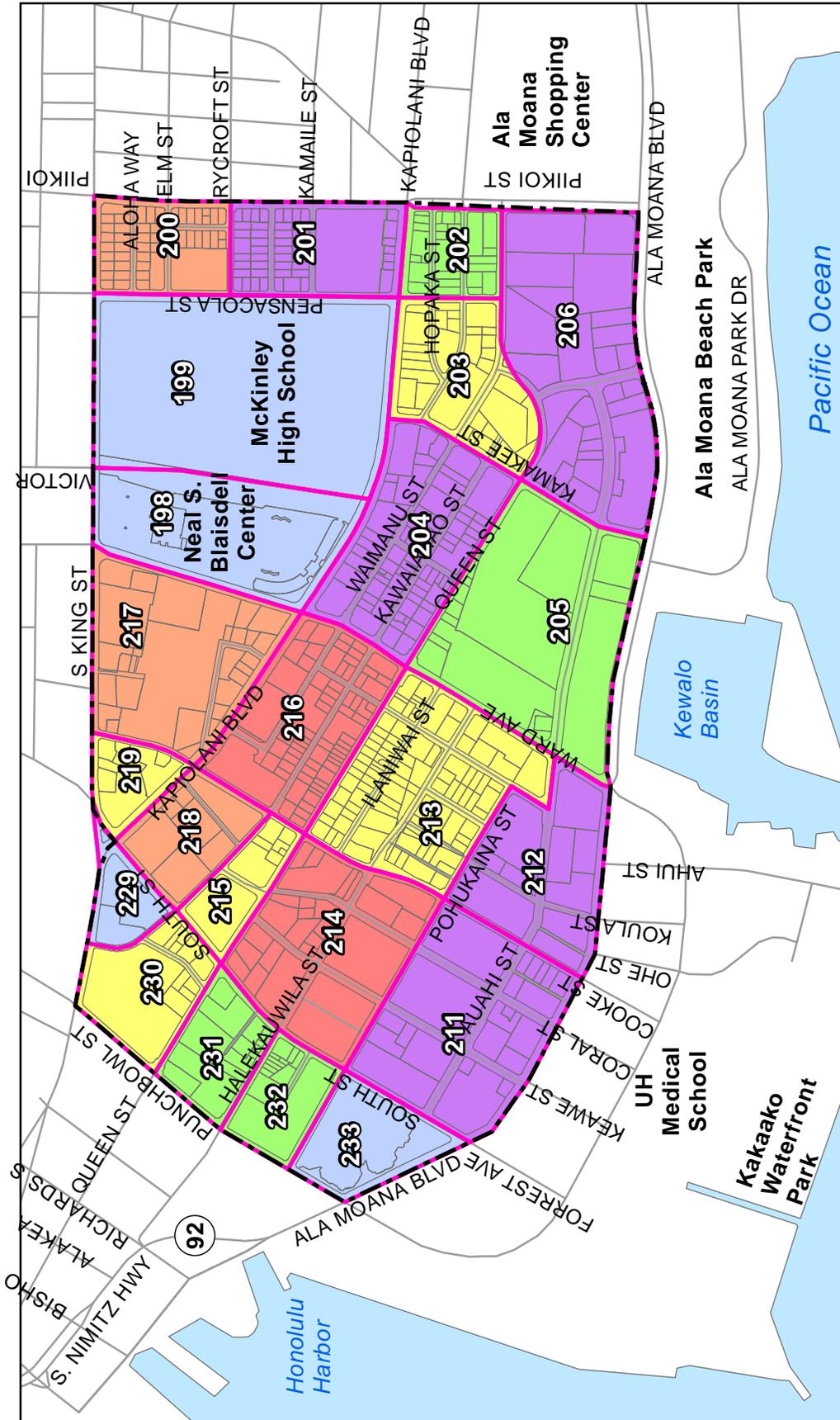
#### Population Conditions, Housing, and Employment

Implementation of the Draft Mauka Area Plan would not be expected to significantly change island-wide population and or the number of housing units. However, if developed to 2030 estimates the Mauka Area would add an additional 24,073 residents and 16,414 housing units to the area, thus leading to a substantial increase in the population and number of housing units in the Mauka Area. Assuming that all measures included in the Draft Mauka Area Plan are implemented and that this growth would occur over the next two decades, the resulting population increase and number of housing units would be expected to have less than significant impacts on population and housing.

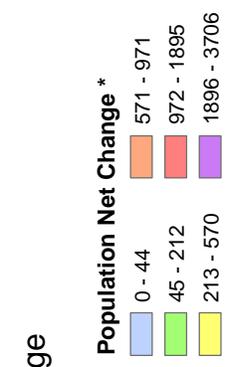
Redevelopment efforts in the Mauka Area would not be expected to significantly change the amount of total economic growth on Oahu. Ongoing and future redevelopment of the Mauka Area would represent approximately six percent of the island-wide 2030 projections. The Draft Mauka Area Plan, if developed to 2030 estimates would add an additional 9,734 jobs to the employment pool of the area. According to the TAZ data, between 2005 and 2030, employment in service and retail sectors would be increased from 8,172 to 11,043 persons and 5,848 to 8,180 persons, respectively. Employment in the light industrial sector is likely to remain stable; both 2005 and 2030 TAZ data report 1,808 persons within the industry. Over time, the absence of growth in the light industrial sector may result in a gradual decline in light industrial uses. Consequently, these industries, such as manufacturing and warehousing may be shifted towards parts of Honolulu with lower rents and more space to accommodate their functions – for example, Kalihi-Palama, Mapunapuna Airport Industrial Area, Sand Island, and Waipahu. While the overall growth in employment would be seen as a positive impact to the area, negative impacts would also result from the potential loss of jobs in the light industrial sector. Because these jobs are likely to shift to other areas of the island and disappear altogether, these negative impacts are anticipated to be less than significant; therefore, no mitigation measures are proposed.

#### Economic Conditions

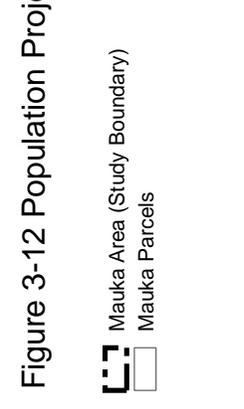
Due to its central location, ongoing and future redevelopment of the Mauka Area would likely continue to command increased rents and sale prices comparable to other parts of downtown Honolulu and Waikiki. Although somewhat less than under the existing Mauka Area Plan, implementation of Draft Mauka Area Plan would continue to increase new multi-family dwelling units in much of the Mauka Area. It is anticipated that most of the Central Kakaako neighborhood would remain in light industrial uses. Continuing the existing trend, with the exception of the 20 percent requirement for reserved housing units, most of the housing stock would likely be priced for the upper-middle and upper income market. Landowners in most cases would benefit from redevelopment increasing property values. This shift in property valuation would also result in increased property taxes. This would likely cause a negative impact by displacing those property owners and/or tenants that found the increased property taxation too burdensome. Conversely, increased property taxes generated from redevelopment activities in the Mauka Area would result in a positive impact by increasing a larger area tax base.



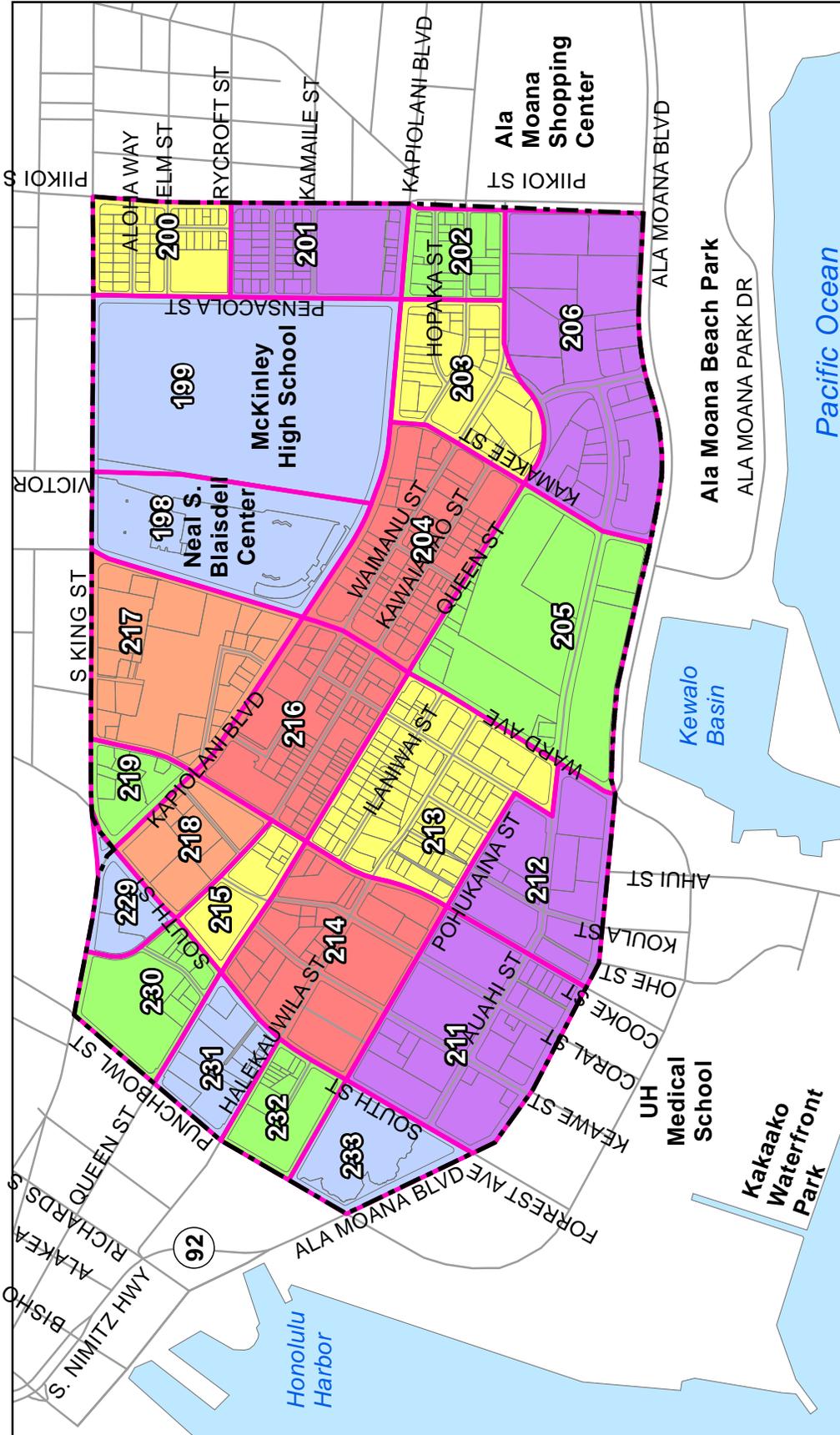
\* The numbers represent the projected change in population for each TAZ zone between the years 2000 and 2030 by the U.S. Census Bureau.



**Figure 3-12 Population Projections - Net Change**



Sources: U.S. Census Bureau, 2007; EDAW, 2008  
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 EDAW | AECOM



**Figure 3-13 Housing Projections - Net Change**

- Mauka Area (Study Boundary)
- Mauka Parcels
- TAZ Zones

**Housing Projections Net Change \***

- 0 - 84
- 85 - 240
- 241 - 443
- 444 - 664
- 665 - 1636
- 1637 - 2241

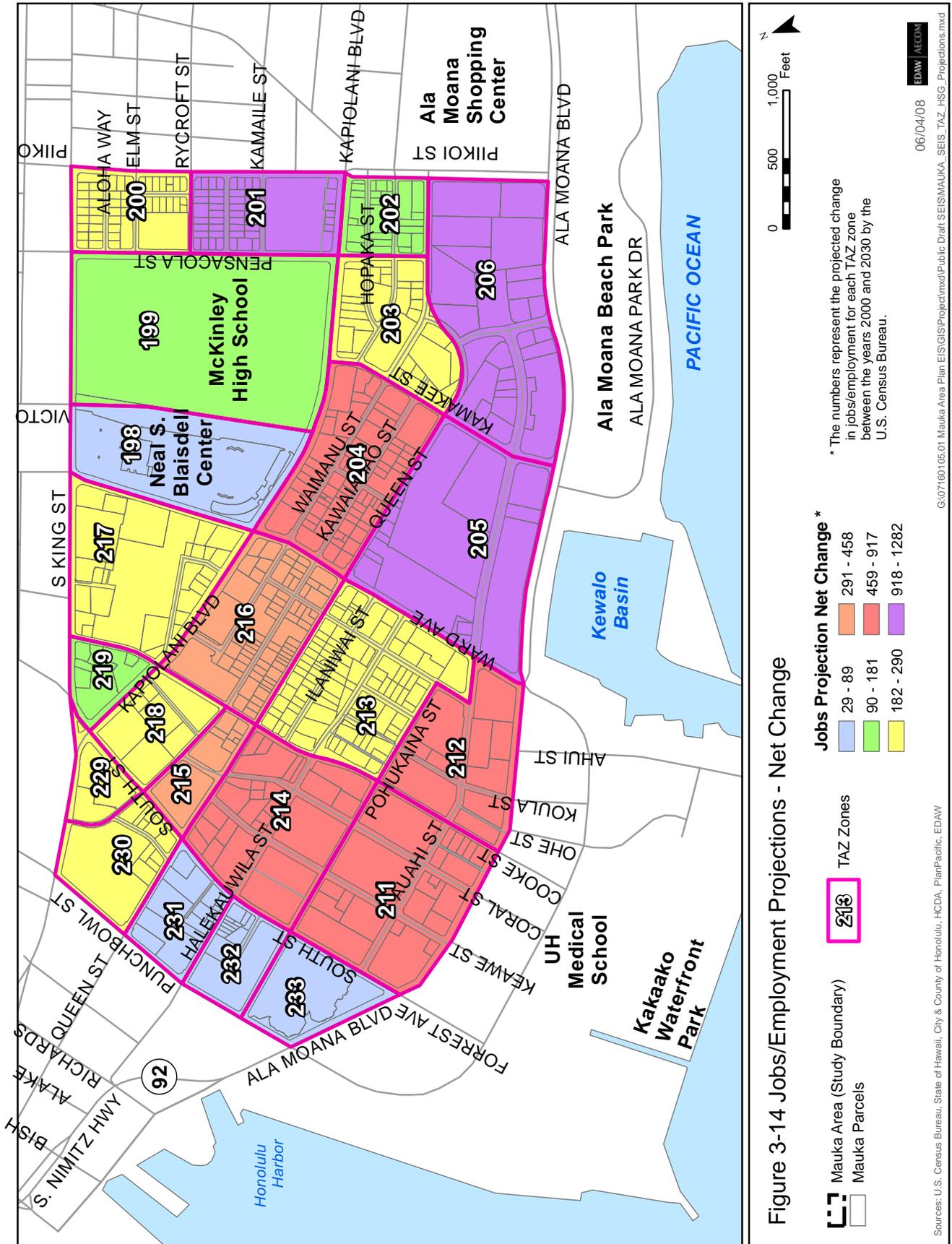
\* The numbers represent the projected change in housing population for each TAZ zone between the years 2000 and 2030 by the U.S. Census Bureau.

Scale: 0, 500, 1,000 Feet

06/04/08 EDAW / AECOM

Sources: U.S. Census Bureau, 2007; EDAW, 2008

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Businesses displaced by public land acquisition and development would receive advisory services including assistance in finding new locations. Relocation payments would also be provided to those displaced by public actions. Businesses displaced by private action may receive public assistance, short of financial payment (see section 2.10 Relocation Plan). Regardless of the level of positive or negative impact, it is anticipated that the Draft Mauka Plan would have a lesser effect than under the existing Mauka Area Plan.

### 3.13 Infrastructure and Utilities

This section addresses the affected environment, potential impacts and mitigative measures relating to infrastructure systems and services as they apply to the Mauka Area. The infrastructure systems and services discussed include storm drain systems, sanitary sewer systems, solid waste disposal program, water systems, synthetic natural gas systems, electrical power systems, telephone and communications systems, cable television systems, ~~communication systems~~, traffic signal systems, roadways ~~and~~ street light systems, and roadways.

#### 3.13.1 Affected Environment

##### Hydrology and Storm Drain Systems

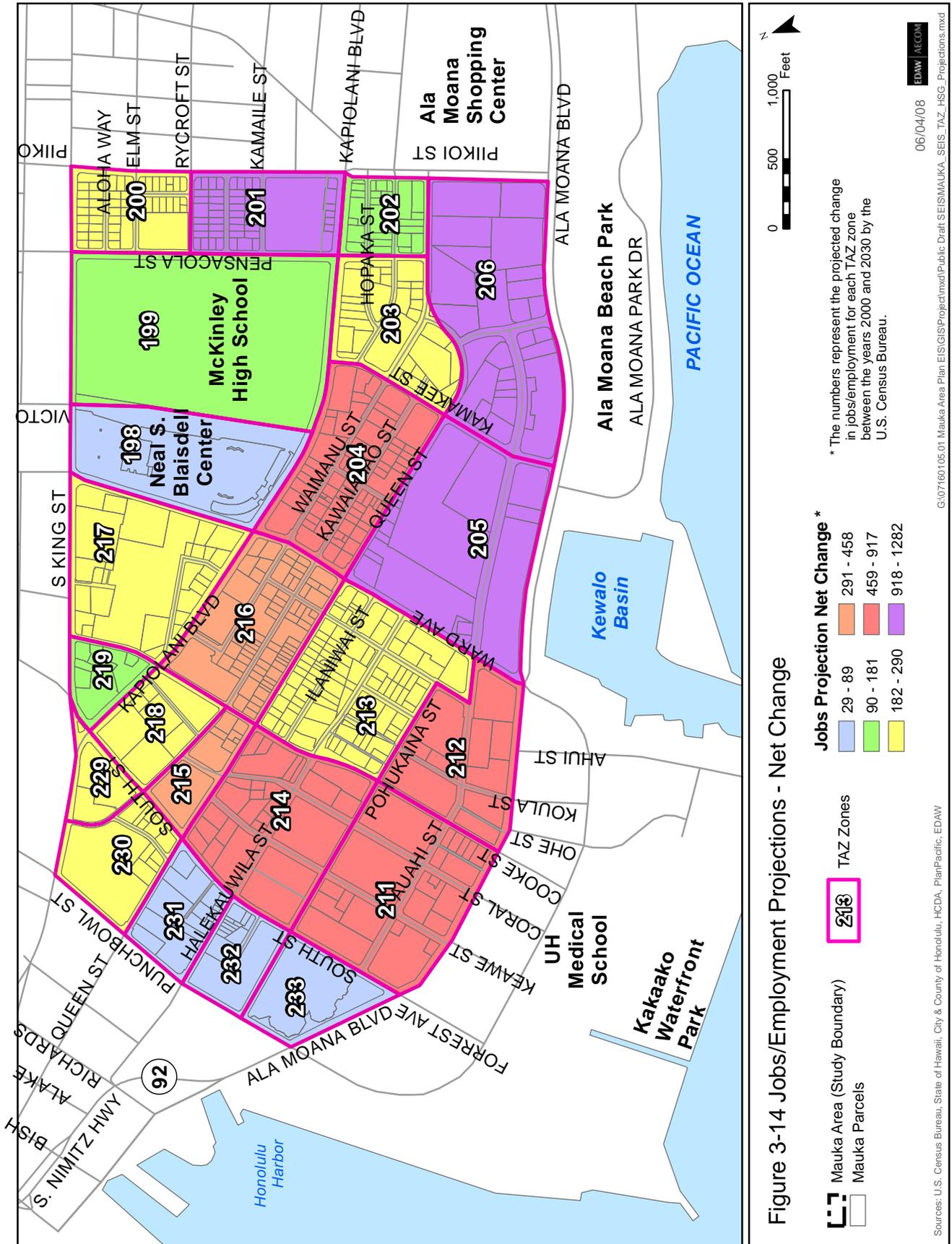
The rainfall-catchment drainage basin of the watershed contributing storm runoff into and through the ~~study area~~ Mauka Area and its neighboring areas is approximately 2,000 acres. The drainage basin stretches from the slopes of Punchbowl Crater to Ala Moana Boulevard (north to south) and roughly from Punchbowl Street to Sheridan Street to Kalakaua Avenue (west to east). ~~Drainage runoff generally flows downgrade from the mountains toward the ocean by gravity.~~

Nine major drainage trunk lines are located within the rights-of-way of each major Mauka to Makai street with general slopes downgrade from the mountains toward the ocean:

- Eight-foot-wide by four-foot-high box drain along Piikoi Street.
- Double 14-foot-wide by eight-foot-high box drain along Pensacola Street.
- 12-foot-wide by four-foot-high box drain along Kamakee Street.
- 10-foot-wide by nine-foot-high box drain transitioning to an 11-foot-wide by eight-foot-high box drain along Ward Avenue.
- Seven-foot-wide by four-foot-wide box drain transitioning to an eight-foot-wide by five-foot-high box drain along Cooke Street.
- 16-foot-wide by nine-foot-high box drain along Coral Street.
- Eight-foot-wide by four-foot-high box drain along Keawe Street.
- 10-foot-wide by nine-foot-high box drain branching off of South Street toward Ala Moana Boulevard.
- Three-and-a-half-foot-wide by two-foot-high box drain along Punchbowl Street.

An additional tenth 99-inch drainage trunk line lies between Ward Avenue and Cummins Street.

The nearest surface stream in the vicinity of the Mauka Area is Nuuanu Stream, which is located about ¼-mile northeast of the Mauka Area. This stream is upgrade from the Mauka Area and anticipated to not be affected by development and redevelopment within the Mauka Area. Flat



**Table 3-13 Design Flows for the ~~Kakaako Watershed and Mauka Area and Kakaako Watershed~~**

<b>Rainfall Catchment Area</b>	<b>Approximate Acreage</b>	<b>Recurrent Storm Frequency</b>	<b>Rainfall Duration</b>	<b>Approximate Design Flow</b>
Mauka Area and Neighboring Areas	2,000	100 Years	24 Hours	6,900 cfs
Mauka Area and Neighboring Areas	2,000	50 Years	24 Hours	5,750 cfs
Mauka Area and Neighboring Areas	2,000	4½ Years	24 Hours	2,400 cfs
Mauka Area Only	450	100 Years	24 Hours	2,300 cfs
Mauka Area Only	450	50 Years	24 Hours	1,920 cfs
Mauka Area Only	450	4½ Years	24 Hours	770 cfs
Entire Mauka Area	450	100 Years	24 Hours	2,300 cfs
Development or Redevelopment (Large) within the Mauka Area	50	50 Years	1 Hour	330 cfs
Development or Redevelopment (Small) within the Mauka Area	0.25 (about 11,000 square feet)	50 Years	1 Hour	1.6 cfs
Kakaako Watershed (Mauka Area and Neighboring Areas)	2,000	100 Years	24 Hours	6,900 cfs

Source: M&E Pacific, 2008

The existing drainage system is able to accommodate and dispose of the more frequent, day-to-day rainfall occurrences and intensities.

Collectively the overall capacity of the existing major drainage trunk lines is estimated to be approximately 2,400 cfs of storm runoff flow, which is discharged to the ocean via outfalls south of the Mauka Area along the coast. Under the City Storm Drainage design standards, this would adequately service a 500-acre drainage area rather than 2,000 acres for their 100-year, 24-hour rainfall design requirement. This 500-acre size is close and comparable to the size of the Mauka Area, which is 450 acres. Thus, the existing drainage system can accommodate the City-required 100-year, 24-hour rainfall runoff contribution from the Mauka Area only, and not any additional flow from neighboring areas outside of the Mauka Area that are serviced by the same drain lines. The existing drainage system can manage, at most, runoff flow from both the Mauka Area and its neighboring areas for the smaller and more frequent 4½-year, 24-hour rainfall event. Thus, under the City Storm Drainage design standards, the existing drainage system would adequately service rainfall runoff contribution from the Mauka Area, and any developments or redevelopments within it. The existing drainage system is inadequate to manage runoff flow from both the Mauka Area and its neighboring areas within the Kakaako watershed according to City design standards.

### Sanitary Sewer Systems

The wastewater collection system servicing the Mauka Area collects sewage generated from within the Mauka Area, combines it with wastewater from adjacent areas, and conveys flow to the Ala Moana Sewage Pump Station (AMSPP) Wastewater Pump Station (Ala Moana WWPS) located on the Makai side of Ala Moana Boulevard and the historic Ala Moana Pump Station

defunct Kakaako Ala Moana Pump Station (AMPS), where wastewater is pumped to the Sand Island Wastewater Treatment Plant (SIWTP Sand Island WWTP) for processing and disposal to the Pacific Ocean. The entire collection and conveyance system is a gravity pipe (sewer) system that consists of smaller pipes that transition to larger diameter sewer branches to accommodate wastewater flows in accordance with City requirements for hydraulic flow. The City Department of Environmental Services (ENV) maintains the existing collection and conveyance sewer system and operates both the AMSPS Ala Moana WWPS and SIWTP Sand Island WWTP. A considerable portion of the original sewer system that was installed in the 1930s has been replaced during the mid-1980s under HCDA's ID Program.

The City ENV collects, treats and disposes of the majority of Oahu's wastewater, approximately 120 mgd. The City ENV operates over 65 wastewater pump stations and nine treatment plants island-wide. As part of the City's sustainability efforts, the ENV has developed reuse and recycling programs for some of its wastewater and sludge processes to conserve potable water, material and energy resources while enhancing the quality of life for residents.

The City has a public/private partnership with Synagro Technologies to produce biosolids pellets at the SIWTP Sand Island WWTP. Construction and testing was recently completed, and Synagro is currently working with the DOH to obtain approval for pellet distribution. This project would divert over 5,650 dry tons of dewatered sludge that normally was disposed of at the municipal landfill. In addition, methane gas produced by the anaerobic digester is used as fuel for the pellet dryer. The City plans to sell and distribute the biosolids from the SIWTP Sand Island WWTP to the public by mid-2008, expand the beneficial reuse of bio-solids from other treatment plants to minimize the amount of sludge disposed of at the municipal landfill, and develop an island-wide biosolids management and reuse plan by the year 2012. The City also plans to expand the production of recycled water from its Honouliuli, Laie and Sand Island facilities to more of its other treatment plants.

The current capacity of the Ala Moana WWPS is about 61.9 million gallons per day (MGD) with a force main capacity of approximately 107.5 MGD. The Sand Island WWTP daily average capacity is approximately 82.0 MGD with a wet-weather capacity of about 200 MGD. The Sand Island WWTP is currently undergoing construction modifications, which will increase its average daily capacity to approximately 90.0 MGD with wet-weather capacity of approximately 270.0 MGD.

The Mauka Area is serviced by the following nine existing sewer mains:

- A 32-inch sewer that runs along Ala Moana Boulevard from the Ewa side of the Mauka Area and intercepts trunk sewers from Punchbowl and South Streets. This 32-inch sewerline increases to a 36-inch pipeline as it reaches the Ala Moana WWPS. This sewerline was constructed in circa 1902 and was rehabilitated in 2004 with a cast-in-place pipe method. This collective sewer main services the downtown area east of Nuuanu Stream and Makai of School Street.
- A second sewer main that runs along South Street from South King Street to Ala Moana Boulevard. Between South King Street and Kapiolani Boulevard the sewer is an 18-inch line (installed in the late 1890s). At Kapiolani Boulevard and Kawaiahao Street, the

sewer increases to a 24-inch line (installed in 1985) that runs from Kawaiahao Street to Queen Street. From Queen Street to Auahi Street, the sewer is a 30-inch line (installed in 1985) that transitions up to a 36-inch line (installed in 2001) that runs to Ala Moana Boulevard. This collective sewer main services approximately 148 acres.

- A third sewer main that follows South King and Cooke Streets. The South King Street segment from Punchbowl Street to South Street is an 8-inch sewer (installed in the late 1890s) that transitions up to 12-inch line and eventually up to 18-inch at the South Street intersection. This 18-inch sewerline runs along South King Street from South Street to Piikoi Street. The Cooke Street Relief Sewer (installed in 1966) diverts all the sewage from the South King Street sewer east of Cooke Street. The Cooke Street Relief Sewer begins as an 18-inch line that runs from South King Street to Kapiolani Boulevard, transitions up to a 21-inch line from Kapiolani Boulevard to Kawaiahao Street, and increases up to a 24-inch line from Kawaiahao Street to Auahi Street. At Auahi Street it connects to the 78-inch Auahi Trunk Sewer (installed in early 1990s). This collective sewer main services an area generally along South King Street and Makai of the freeway.
- A fourth sewer main that begins as an 8-inch line (installed in the late 1890s) on Ward Avenue Makai of South King Street and transitions up to a 10-inch line (installed in 1919) before Kapiolani Boulevard that continues on until Queen Street. The sewer transitions up to a 12-inch line (installed in 1919) at Queen Street that runs until Auahi Street, where it enlarges up to a 14 inch line just before joining the 78-inch Auahi Trunk Sewer (installed in 1991) that runs along Auahi Street and down Keawe Street. This collective sewer main serves areas within the Mauka Area and terminates at the Ala Moana WWPS.
- A fifth sewer main that runs parallel to the aforementioned fourth sewer main along Ward Avenue. The 60-inch Ward Avenue Relief Sewer (installed in 1975) collects sewage flows from Kalihi and Manoa-Kaimuki interceptor sewers through the Kakaako District and does not collect sewage flows along Ward Avenue. At Auahi Street, the sewerline joins the 78-inch Auahi Trunk Sewer (installed in 1991, parallel to the East End Relief Sewer segment) that runs along Auahi Street.
- A sixth sewer main known as the East End Relief Sewer, is comprised of a 78-inch segment along Auahi Street (installed in the late 1980s) and a 48-inch line (installed in 1959) along Rycroft Street that runs along Pensacola Street, Kapiolani Boulevard, Cummins Street, Queen Street, and Auahi Street. This collective sewer main relieves the South King Street sewer at Piikoi Street, 36-inch sewer on Kapiolani Boulevard, and other areas outside and adjacent to the Mauka Area.
- A seventh sewer main is a 36-inch line (installed in 1925) located along Kapiolani Boulevard between Piikoi Street and Kamakee Street. This sewer continues along Kamakee Street to Auahi Street. Makai of Auahi Street, the sewer transitions up to a 48-inch (installed in 1996) that runs to Ala Moana Boulevard. This sewer joins a 69-inch line (installed in 1963) on Ala Moana Boulevard that runs to Keawe Street, where it enlarges to a 78-inch line (installed in 1991) that runs to the Ala Moana WWPS. This

collective sewer main conveys sewage originating from the Fort DeRussy Sewage Pump Station in Waikiki.

- An eighth sewer main is a 69-inch line (installed in 1964) that traverses Ala Moana Beach Park and connects the Beachwalk (Waikiki) and Moana Sewage Pump Station (SPS) at Ala Moana Beach Park to the Ala Moana WWPS.
- A ninth sewer main is a 78-inch line (installed in early 1990s) located along Auahi Street from Ward Avenue to Keawe Street that runs down Keawe Street to the Ala Moana WWPS. This collective sewer main conveys sewage flow from Keawe Street, Cooke Street, and the Ward Avenue Relief Sewer, which connects to it at Ward Avenue.

### Solid Waste Disposal Program

Trash and rubbish generated by residences and businesses are referred to as “solid waste”. The ENV Refuse Division manages the collection, disposal and recycling operations for the bulk of the solid waste. The City does not collect industrial or hazardous waste (such as, auto parts, batteries, oil filters, etc.). Industrial or hazardous waste must be disposed of by other privately-contracted services.

The ENV collects solid waste twice a week (Tuesday and Friday) primarily from residences in the Mauka Area while private contractors to the City collect solid waste from businesses. Private contractors that currently collect solid waste from the Mauka Area for disposal include Rolloffs Hawaii, Waste Management, and Honolulu Disposal Service. Refer to Figure 3-15 for a visual summary of the existing collection areas for the ENV and private contractors for the solid waste disposal program.

No existing or proposed solid waste disposal facilities are located within the Mauka Area. All solid waste is collected then disposed of outside of the Mauka Area to recycling/composting facilities, landfills or the H-Power facility in James A. Campbell Industrial Park (Kapolei), where combustible waste is incinerated to produce electricity. Approximately 1.76 million tons of solid waste is generated in the City and County of Honolulu annually, and the ENV diverts away approximately 1 million tons of this solid waste stream from the landfill to various material and energy recovery and recycling programs. The ENV is currently working on a revised version of the City’s *Integrated Solid Waste Management Plan (ISWMP)* for the next five years. The goal of the ISWMP is to divert as much waste from the current landfill as possible. The diversion of waste from the landfill allows the City to continue to utilize the existing landfill without the need to acquire additional land for landfill purposes. The City plans to expand and enhance its current H-Power solid-waste-to-energy facility for 300,000 annual ton increased capacity by the year 2011 to reduce public dependency on imported oil; generate electricity from methane gas retrieval by early 2009; and, expand and improve their green and food waste and recycling programs by July 2009.

### Water Systems

The Kakaako water system that encompasses the Mauka Area is part of the City Board of Water Supply’s (BWS’s) Honolulu Low Service Area, which stretches from Red Hill to Makapuu Point. The water supply to the Mauka Area originates from wells and tunnels or shafts. The



**Figure 3-15 Solid Waste Disposal Program - Existing Service**

- Area of Solid Waste Collection Service by the City and County of Honolulu (Tuesday & Friday)
- Area of Solid Waste Collection Service by Private Companies
- Mauka Area (Project Boundary)



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Sources: City & County of Honolulu, 2008, HCDA, 2008, M&E Pacific, Inc., 2008.

Mauka Area is served by the Bella Vista and Punchbowl Reservoirs, which provide water storage for a portion of peak hourly demands, as well as, emergencies. Major water pump stations that also service the Mauka Area during peak hours include the Kalihi and Beretania BWS Stations. The water is conveyed through pump stations and storage reservoirs through transmission lines, and distributed through a network of pipes (water mains and service laterals).

The existing water distribution system servicing the study area Mauka Area consists of a looped system of underground water mains varying in diameter sizes from six, eight, 12, 16, and 20 inches. The larger mains (12 inches and larger) lie below the perimeter roadways (Ala Moana Boulevard, Punchbowl Street, South King Street, Piikoi Street, and Kapiolani Boulevard).

The larger mains also lie along primary roadways (Cooke Street Ward Avenue, Kamakee Street, and Pensacola Street). The smaller mains lie along the remaining interior roadways. Fire hydrants are spaced at a maximum distance of 350 feet. All water lines (mains and service laterals) and appurtenances (water meters) are maintained by the BWS.

No wells are located within the Mauka Area except for an artesian well located on parcel TMK: (1)2 1 048:018. The major sources of water for the Mauka Area are the Punanani Wells, Kalauao Wells, Halawa Shaft, and Kaamilo Wells, all located in the Pearl Harbor District. Other sources of water that serve the Mauka Area are the Wilder Wells, Kalihi Shaft, Kalihi Station and Beretania Station, all located in the Honolulu District. The water pumped from these sources are stored in reservoirs and then distributed by gravity transmission and distribution lines to users

Transmission and distribution lines within the Mauka Area consist of the following waterlines:

- 20-inch pipeline along Kapiolani Boulevard from South King Street and South Street to Cooke Street.
- 20-inch pipeline along Cooke Street from Kapiolani Boulevard to Pohukaina Street.
- 12-inch pipeline along Cooke Street from Pohukaina Street to Ala Moana Boulevard.
- 16-inch pipeline along Piikoi Street between South King Street and Kapiolani Boulevard.
- 12-inch pipeline along Ala Moana Boulevard, Kapiolani Boulevard, Ward Avenue, Pensacola Street, and Piikoi Street.
- Eight-inch or smaller-size pipelines on all other streets

The water system has been improved and upsized by the BWS as required to generally meet the current water demand in accordance with the prevailing water system design standards. Some areas within the Mauka Area contain segments of existing six inch water mains, which will get upgraded to the BWS-minimum standard size of eight inches, as necessary, by the BWS.

During the planning phase, each proposed development has an estimated water demand that is reviewed and evaluated by the BWS using their computer modeling. Based on their analysis, the BWS will approve the new water service or recommend necessary improvements to the water distribution system as required.

### Synthetic Natural Gas Systems

The primary source of synthetic natural gas for the Honolulu area is The Gas Company (GASCO). GASCO's SNG Plant, which is located at Barbers Point on southwestern Oahu (Ewa), supplies and conveys gas by 16 inch transmission lines to GASCO's staging plant at Pier 38 in Honolulu Harbor. From Pier 38, the gas is transmitted throughout the Honolulu service area by 6 inch, 8 inch and 10 inch supply lines to their respective distribution systems, including the system servicing the Mauka Area. The SNG distribution system within the Mauka Area consists of a network of two-inch, three-inch and four-inch main lines connected to smaller-size service laterals to users. Synthetic natural gas is provided to individual parcels through service lines that terminate at meters inside property lines. ~~Gas is transmitted through a network of distribution lines throughout the Mauka Area via service laterals.~~ Refer to Figure 3-16 for a visual summary of the existing service area and distribution network.

### Electrical Power, Telephone, Cable Television and Communication Systems

Existing roads along Waimanu, Kona, Hopaka Streets, and unimproved portions of Pohukaina, Queen, Halekauwila, Kawaihahao and Keawe Streets are paved but lack curbs, gutters and sidewalks. The predominant land use along these roads consists of small businesses whose electric service is extended from existing overhead lines. Along Auahi, Piikoi, Rycroft, Hoolai and Kamaile Streets and Alohi Way, the existing road improvements consist of City standard curb, gutter, sidewalk and asphalt concrete (AC) pavement. The predominant land use along Rycroft, Hoolai and Kamaile Streets and Alohi Way, are single family homes whose electric service is extended from existing overhead lines. Most of the land along Auahi Street has been consolidated into larger parcels whose electric service is extended either from the existing overhead lines on Auahi Street or Ala Moana Boulevard.

Unless determined by HECO, HTCO, and Oceanic to be inadequate, applicable duct systems along South, Cooke, Coral and Kamakee Streets and portions of Pohukaina, Queen, Halekauwila, Kawaihahao and Keawe Streets that were placed underground under previous projects would remain and would not be impacted by future developments. HECO, HTCO, and Oceanic would evaluate the adequacy of the duct system on a project-by-project basis. Further, under a State DOT/Federal Aid project, existing overhead lines along Ala Moana Boulevard between Cooke and Queen Streets would be undergrounded. Any impacts and mitigation measures necessary for this proposed utility work would be addressed by the State DOT.

### Traffic Signal Systems

Within the Mauka Area, the City DTS, Traffic Signal and Technology Division, owns and maintains existing traffic signals at the following intersections:

- Punchbowl/Halekauwila Streets;
- Punchbowl/Queen Streets;
- Punchbowl/South King Streets;
- Kapiolani Boulevard and King Street;
- Queen/South Streets;
- South/Halekauwila Streets;
- South/Pohukaina Streets;

- Cooke Street and Kapiolani Boulevard;
- Cooke/Queen Streets;
- King Street and Ward Avenue;
- Kapiolani Boulevard and Ward Avenue;
- Ward Avenue and Queen Street;
- Ward Avenue and Halekauwila Street;
- Ward Avenue and Auahi Street;
- Kamakee Street and Kapiolani Boulevard;
- Pensacola/King Streets;
- Kamakee/Auahi Streets;
- Pensacola Street and Kapiolani Boulevard;
- Pensacola/Waimanu Streets;
- Piikoi/King Streets;
- Piikoi Street and Kapiolani Boulevard;
- Piikoi/Kona Streets; and,
- Piikoi/Waimanu Streets.

In addition the City owns and maintains three mid-block signals, two located along Auahi Street at entrances to Ward Warehouse and Ward Center, and one located at the Piikoi Street entrance to Ala Moana Shopping Center.

The traffic signals at the following Ala Moana Boulevard intersections are owned by the State DOT and maintained by the City:

- Punchbowl Street;
- South Street;
- Keawe Street;
- Coral Street;
- Cooke Street;
- Koula Street;
- Ward Avenue;
- Kakaako Waterfront Park Access Road;
- Kamakee Street;
- Queen Street; and,
- Piikoi Street.

Additionally, the City also owns and maintains a closed-circuit television (CCTV) system which terminates at the City Traffic Management Center located on Kinalau Street near Ward Avenue. The CCTV cameras are used in conjunction with other monitoring devices as part of an intelligent transportation system (ITS) to regulate traffic flow through metropolitan Honolulu. At present, the City controls the timing of both City-owned and State-owned traffic signals.

#### Roadway Street Light Systems

Street lights are located throughout the Mauka Area along public roadways. The street lighting system is owned and maintained by the City with existing lines routed in underground raceways and overhead on wood poles.

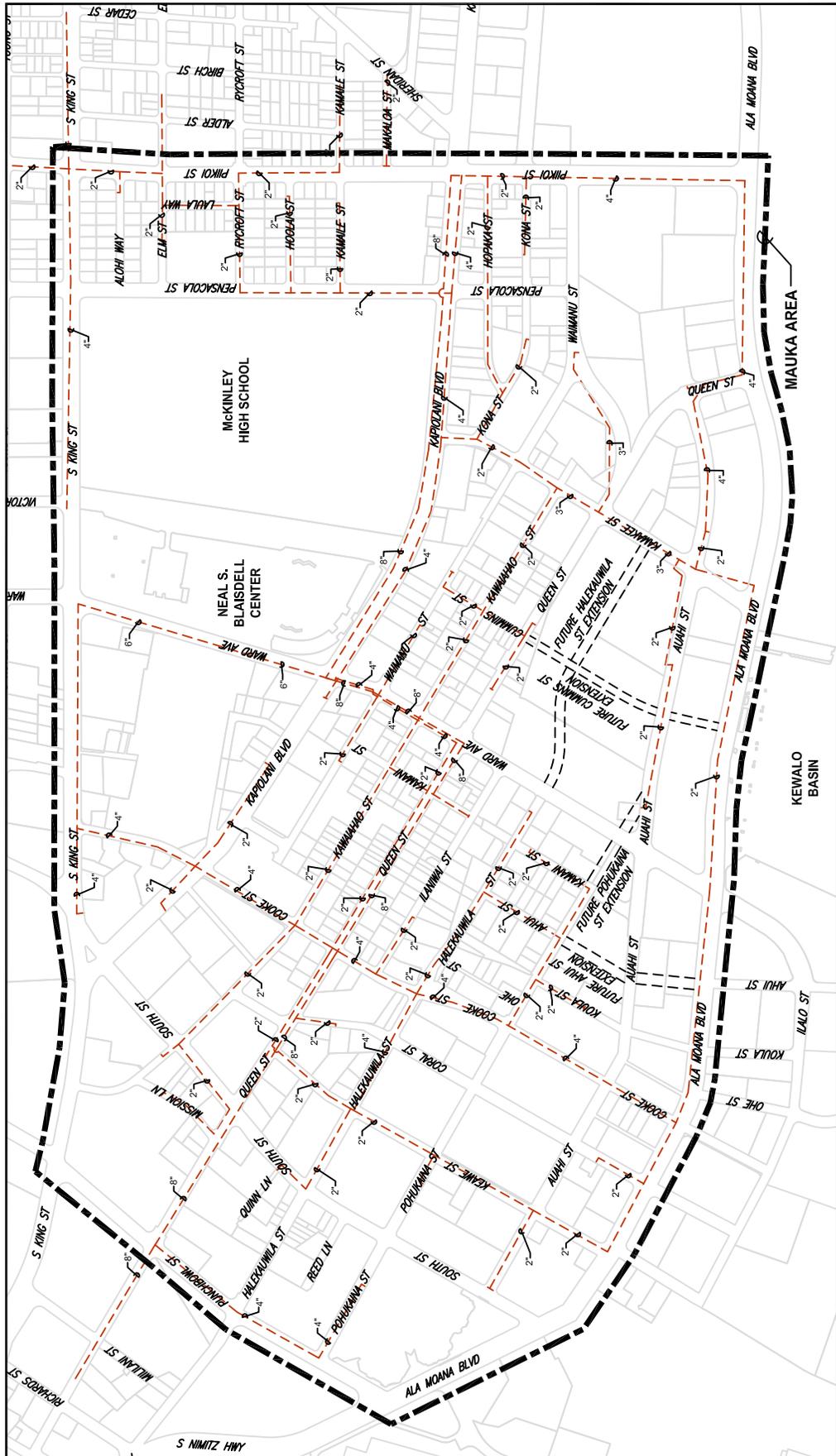


Figure 3-16 Synthetic Natural Gas Systems - Existing Service Distribution

- - - Existing Gas Line
- - - Mauka Area (Project Boundary)
- 4" Pipeline Size and Callout Tag Leader



Sources: State of Hawaii, 1985, City & County of Honolulu, 2008, HCDA, 2008, GASCO, 2007, M&E Pacific, Inc., 2008.

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With the increase of residential units and commercial and industrial properties within the Mauka Area, the illumination criteria on which the present street lighting system is based may need to be evaluated and, if necessary, the street lighting system may need to be upgraded to account for the higher pedestrian and automobile interaction. Should the City standardize lighting technology differing from the current high-pressure sodium lamp and ballast, consideration should be given to upgrading the street lights to the newer technology since the City's rationale for switching technologies would probably result in lower energy usage.

### Roadways

Although most of the main roadways within the Mauka Area have been improved by the HCDA under their ID Program, several existing roadways (mostly smaller, minor streets) are aged, flat and subject to localized ponding occurrences that present concerns to motorists, pedestrians and bicyclists. Pedestrian walkways and bicyclist access are limited along these streets, and motorists do not have pavement striping, marking or reflective markers to guide their driving on some of these streets. Signage is also limited and vehicular parking along some of these streets hinders traffic circulation and causes concern for travel safety. ~~ROW widths of some of these streets are narrower than City standards.~~

Improvements to roadways are designed to meet or exceed City standards. All roadways would comply with the *Subdivision Rules and Regulations* of the City Department of Land Utilization and *Traffic Standards Manual* of the City Department of Transportation Services. Roadways are classified into three distinct categories—major, secondary and minor. The minimum roadway ROW widths for major, secondary and minor streets are 70 feet, 56 feet and 40 feet, respectively. Table 3.14 summarizes existing and proposed roadway ROW widths for streets recommended to be improved within the Mauka Area.

As part of the Draft Mauka Area Plan, existing streets are proposed to be brought up to City standards wherever possible and not limited by space. New streets, space permitting, are proposed to be designed to City codes and criteria governing pavement section, lane widths, sidewalks, bike lanes (in accordance with the State's *Bike Plan Hawaii*), curbs, gutters, planter areas, sight distance requirements, stopping distance requirements, radii, ADA curb ramps, accessible routes, signage, crosswalks, and pavement marking and striping. The width of sidewalks is proposed to be a minimum of four feet and comply with the provisions of Chapter 20 Revised Ordinances, 1969, as amended. The terrain or topography of the Mauka Area is relatively flat and special consideration needs to be made to ensure that the minimum slope of new roadways shall not be less than 0.4 percent with minimum cross slopes of two percent to allow for proper stormwater runoff drainage from the sidewalks.

## 3.13.2 Potential Impacts and Mitigation Measures

The KCDD, Mauka Area Infrastructure Plan supports the Draft Mauka Area Plan, and proposes to establish an infrastructure system that adequately supports future redevelopment, development growth, and diversification and densification of land use and population. The proposed infrastructure system would support a population projection out to the year 2030. The KCDD,

Mauka Area Infrastructure Plan, serves as the reference and basis of design for the following infrastructure evaluation and recommendations.

**Table 3-14 Existing and Proposed Roadway Right-Of-Way Widths**

Roadway	Roadway Classification	Existing Roadway Right-Of-Way Width	City Standard Width (Minimum)	Proposed Roadway Right-Of-Way Width	Infrastructure Improvements
Ala Moana Boulevard	Major	100 Feet	76 Feet	100 Feet	Yes
Piikoi Street	Major	80 Feet	76 Feet	80 Feet	No
Pensacola Street	Major	76 Feet	76 Feet	76 feet	Yes
Queen Street	Secondary	60 Feet	56 Feet	60 Feet	Yes
Halekauwila Street	Secondary	60 Feet	56 feet	60 feet	Yes
Waimanu Street	Minor	50 Feet	40 Feet	50 feet	Yes
Kawaihāo Street	Minor	50 Feet	40 Feet	50 Feet	Yes
Ilaniwai Street	Minor	40 Feet	40 Feet	40 Feet	Yes
Cummins Street	Minor	40 Feet	40 Feet	40 Feet	Yes
Kona Street	Minor	40 Feet	40 Feet	40 Feet	Yes
Hopaka Street	Minor	40 Feet	40 Feet	40 Feet	Yes
Alohi Way	Minor	40 Feet	40 Feet	40 Feet	No
Elm Street	Minor	40 Feet	40 Feet	40 Feet	No
Laula Way	Minor	40 Feet	40 Feet	40 Feet	No
Rycroft Street	Minor	40 Feet	40 Feet	40 Feet	No
Hoolai Street	Minor	40 Feet	40 Feet	40 Feet	No
Kamaile Street	Minor	40 Feet	40 Feet	40 Feet	No

Source: M&E Pacific, 2008

#### General Construction-Related Potential Impacts and Mitigation Measures for All Infrastructure and Roadway Improvements—Noise

The construction of the infrastructure improvements—upsizing and expansions of utility lines and facilities—would primarily impact the social and economic well-being of Mauka Area business people and residents. Construction activities would also generate impact on the physical environment with respect to air and water quality. These impacts, however, would be temporary and generally occur only during construction.

To prevent overloading of existing infrastructure, the HDCA would not issue an “approval of project eligibility” to a proposed development unless adequate off-site infrastructure would be available prior to project completion. A proposed development must also demonstrate that it would not subsequently be disrupted by planned infrastructure improvements.

To the extent possible, all infrastructure would be located underground within public street rights-of-way so that adverse visual impacts would be mitigated. In order to minimize construction-related impacts for infrastructure, underground improvements would be coordinated with street improvements; the timing of infrastructure improvements would be made concurrent with roadway improvements as much as practicable to minimize impacts.

Short-term noise impacts associated with the installation of the infrastructure improvements would occur as a result of the proposed construction. These impacts are unavoidable due to the short distances between existing residential/commercial structures and the proposed underground facilities, and the necessity to break existing pavement, trench, and drive piles. Exterior

construction noise levels at certain buildings would, at times, exceed 80 dB when work is performed within 50 feet of these structures. The interior noise levels at these buildings would probably exceed 60 dB. Noise exposure from construction activities at any one location would be in the order of 2 to 4 weeks as the improvements progress past that location.

Noise levels of diesel-powered construction equipment typically range from 75 to 95 dB at a 50-foot distance. Primary noise sources during construction are expected to be backhoes, front-end loaders, pumps, cranes, miscellaneous trucks, jackhammers and pile drivers. Table 3-15 presents average noise levels of various construction equipment used on Oahu. Noise levels of 70 to 80 dB would occur nearly continuously from 8:00 am to 11:00 am, with short (about 1 minute) periods of idle and equipment repositioning. During the lunch break, noise levels at the construction site would decrease to the local background ambient level of 50 dB.

**Table 3-15 A-Weighted Sound Levels (dB) for Construction Equipment (at 50-Foot Distance)**

<b>Equipment</b>	<b>A-Weighted Sound Level at 50-Foot Distance</b>
Bulldozers	85 dB
Compactors	85 dB
Graders	83 dB
Front-End Loaders	83 dB
Scrapers	85 dB
Hand Tampers	85 dB
Backhoes	80 dB
Rollers	85 dB
Trenchers	83 dB
Compressors	80 dB
Forklifts	80 dB
Cement Trucks	85 dB
Mobile Cranes	85 dB
Jackhammers	98 dB

*Source: A Final Supplemental Environmental Impact Statement, Kakaako Community Development District Plan, State of Hawaii, Hawaii Community Development Authority and US Department of Housing and Urban Development, 1985*

Construction noise levels are expected to be highest where pile driving would be required. Piles would be used to support underground piping, and driven plates would be used to shore-up the sides of trenches and provide barriers for dewatered work areas as required. Noise from these activities are characterized as intense (greater than 95 dB) impulses of short individual duration (less than one second), but are repetitive as the piles are driven. Pile driving is not anticipated to occur within 1,000 feet of most residential structures. The major portion of the infrastructure work is anticipated to affect commercial/industrial businesses. However, school grounds within the Mauka Area would be considered to be noise sensitive if classes are in session during construction activities.

Mitigation of noise from construction activities on Oahu is generally accomplished by enforcement of the DOH noise regulations. The noise regulations of the existing Mauka Area Plan are modeled after the DOH regulations, and therefore similar enforcement procedures would be used within the Mauka Area. The mitigation of construction noise on Oahu has been accomplished by citing equipment with defective mufflers, and by limiting the hours of operation of excessively noisy operations, such as, pile driving.

Under DOH permit procedures, construction activities that exceed 95 dB at adjoining properties are restricted to the hours between 9:00 am and 5:30 pm, from Monday through Friday, and excluding certain holidays. These curfews on excessively noisy activities are intended to minimize noise impacts on residences since home occupancy rates are lower during the allowable construction periods. As a general rule, pile driving activities would fall within this excessively noisy category, and the existing permit procedures would be adhered to.

Because a major portion of the infrastructure work would generate noise impacts on daytime business/commercial operations rather than residences, consideration would be given to nighttime and early morning waivers of existing property line noise limits within the area whenever construction noise levels at residences do not exceed 50 dB. Waivers to continue construction activities past 6:00 pm, from Monday through Saturday, have been granted when the best interests of the public are served by reducing the period of construction or by reducing traffic congestion. This may occur along Ala Moana Boulevard. Use of waivers to allow for nighttime construction activities when residences would not be affected, would minimize construction noise impacts on daytime business and school activities.

The use of heavy equipment, such as, pile drivers, during construction activities may also generate occasional high levels of vibration in and around the construction sites. Vibrations are felt when heavy equipment are used and during certain types of excavation activities. The operations involving the use of heavy equipment can generate vibration perceptible to receptors located in nearby structures. Those buildings that are in close proximity to heavy excavation activities may be impacted by construction-generated vibrations. Mitigative measures to ameliorate the effects of vibration include the use of vibratory hammers and eliminating changes in water levels in excavated trenches. Water is an excellent conductor of sound waves and high water levels can be conducive to vibration effects.

#### General Construction-Related - Water Quality

The construction of infrastructure improvements is not anticipated to generate any adverse impacts on existing groundwater resources in the Mauka Area or to the caprock located at the coast. However, a potential impact may be realized on the nearshore coastal waters and Honolulu Harbor since the existing Mauka Area drainage system ultimately discharges to Honolulu Harbor via ocean outfalls. There are two potential sources of water quality pollutants that may enter the coastal waters and Honolulu Harbor from the Mauka Area drainage system:

- Construction activities (sediments, oil and debris); and,
- Dewatering activities.

Pollutants from construction activities would include sediment from the disturbance of ground cover (vegetation, paving and structures); clearing and grubbing; and, excavation and embankment. Sediments and other materials generated during construction can enter the existing drainage system via runoff during rainy periods or sprinkling activities.

As a mitigation measure to the aforementioned potentially adverse water quality impacts, a temporary cofferdam and debris-sediment trap, or alternate method, could be installed at the outlets of the drainage system during construction. This would keep seawater from entering the

excavation during construction and would trap all of the sediment and debris that may wash into the ocean should a storm occur while construction is in progress. The contractor would be responsible to maintain the debris-sediment trap in good working order so that it keeps the quality of water at the shoreline minimally affected by the sediment, debris, or other contaminants from construction.

In some locations, trenches for new utility lines and drainage structures would extend below the groundwater table. Where necessary, the excavated trench would be dewatered or an alternate method would be used so that construction is accomplished in a dry trench. Excavation below the water level would cause sediment to mix with water within the trench. A dewatering system taking water directly from the trench would contain a high concentration of sediment. Therefore, where necessary, the contractor would be required to treat this water before disposing it into any existing drainage system. A potential dewatering method is to install well casings, screened at the bottom and set at least five feet below the bottom of the excavation. Electric dewatering pumps can be used to pump the water from the well casings and discharge it into the existing drainage system. The granular material at the bottom of the excavation would serve as a filter and only heavy sediment-free water would be pumped from the trench. Where necessary, the contractor would be required to install sediment and oil traps during construction to prevent the contamination of the shore waters. In all cases, the water must be tested for contaminants and the discharge must meet all applicable Federal, State and City rules concerning water pollution prior to release to the drainage system. Discharge permits must be obtained from the City, DOH and US Corps of Engineers.

For construction projects, permanent erosion control measures and Best Management Practices need to be in-place and established before the temporary measures and practices are removed and ceased.

#### General Construction-Related - Air Quality

Construction of infrastructure and roadway improvements within the Mauka Area would generate temporary adverse impacts on the ambient air quality. The principal pollutants anticipated are fugitive dust from construction activities and hydrocarbon emissions or exhaust fumes from construction equipment and vehicles. The generation of fugitive dust is a matter of particular concern because of the ease with which dust can be generated. Emission sources of this pollutant include excavation and embankment activities; hauling of construction materials and debris; use of construction vehicles and equipment; the addition of vehicles belonging to construction workers; traffic congestion; and, general construction activities.

Although the generation of fugitive dust is a matter of concern, it is not anticipated to be a major impact. The majority of construction activities would be performed within existing roadways. Therefore, it is not anticipated that there would be any major earthmoving operations that is normally associated with new roadways. Thus, the emission rate of fugitive dust should be lower than levels associated with new roadway construction.

A potential adverse impact could result from the transporting of the excavation material from the Mauka Area to the disposal or dump site. The addition of heavy-duty trucks could adversely impact local traffic conditions.

Other excavation activities during construction would include cutting through existing pavement, trenching, backfilling and restoration/repairing of pavement. These activities would also affect the air quality of the Mauka Area.

The generation of hydrocarbon emissions or exhaust fumes would also adversely impact the ambient air quality of the Mauka Area. Sources of exhaust fumes include diesel-powered vehicles, equipment, and generators. The construction equipment would be in constant use during the period of construction and therefore would be continually emitting exhaust fumes. Hydrocarbon emissions would also be generated by the additional presence of vehicles belonging to construction workers and as a result of traffic congestion generated during construction. It is not expected that the vehicles belonging to the construction personnel would adversely affect the air quality. However, the disruption of normal traffic patterns and anticipated traffic congestion would cause an increase in hydrocarbon levels.

Under normal tradewind conditions, dust and fumes would be dispersed away from the Mauka Area toward the ocean. However, during periods of Kona winds when the wind changes direction, the ambient air movement in the Mauka Area would decrease thereby lowering the ambient air quality. Due to the constant changing of meteorological conditions, the exact extent of the air quality impacts from the project's construction activities cannot be accurately projected.

To mitigate the effects of construction on air quality, all of the equipment would need to meet the requirements of State emission control laws. The DOH would monitor equipment for compliance.

#### Hydrology and Storm Drain Systems

The existing drainage system within the Mauka Area is adequate to accommodate both existing and future flows through the year 2030 within the Mauka Area based on City design requirements. Additionally, the conditions of the main drain lines and structures appear to be sufficient to last through the year 2030. Thus, there are no recommendations for improvements to the drainage system.

~~As noted, the existing drainage system within the Kakaako District is inadequate to accommodate flows of the existing and future conditions of both the Mauka Area and its surrounding areas.~~ System improvements and upgrades are not practicable due to budgetary and space constraints. The estimated discharge capacity required to adequately drain the 2,000-acre watershed, which encompasses both the Mauka Area and its neighboring contributory areas that are serviced by the same drainage system, is approximately 6,900 cfs. Theoretically, the existing drainage trunk lines need to be enlarged by a factor of 1.8 in order to accommodate this design flow. Three new, additional 24-foot wide by 12-foot high double cell box culverts sloping at 0.0005 feet per foot (0.05 percent) with appurtenant drainage structures to collect and channelize the additional stormwater runoff into these three box culverts, would be able to convey the flow difference of 4,400 cfs between 6,900 and 2,500 cfs. However, the existing thoroughly-developed, built-up condition of the Mauka Area renders such a large drainage way infeasible and impractical due to lack of space to accommodate such a structure.

Due to the existing thorough extent of development within the Mauka Area, future redevelopment and improvements would not significantly alter the hydrological runoff character of the land; the relative percentage of hardscape and impermeable surface to more permeable areas would not change substantially from the existing to the year 2030 since development and redevelopment would be primarily vertical, which does not affect design runoff flow. As such, the size quantity of year 2030 drainage flows would be similar to existing drainage flows. Thus, redevelopment and densification within the Mauka Area would not worsen or increase runoff flows from the existing condition in the downstream drainage system. This is generally the primary criteria by which the City allows and approves construction projects to occur. The City generally evaluates projects on individual, case-by-case bases to confirm that downstream flow conditions are not increased and worsened. Additionally, the City requires any additional storm water discharge generated by developments and redevelopments above the existing condition to be retained on site for individual, site-specific projects.

Practical roadway improvements compliant with City requirements are proposed as part of the Draft Mauka Area Plan to mitigate localized stormwater ponding within uncurbed roads. Water capture and reuse by buildings and developments, and increased plantings of groundcover and vegetation within roadway ROWs, lots, building decks and rooftops would reduce surface runoff and improve stormwater quality by allowing water to percolate more readily into the ground (natural filtration) and undergoing evapotranspiration.

To alleviate localized ponding areas on the more frequent, day-to-day rainfalls, drain inlets, catch basins and associated connecting drainlines are recommended to be installed. Additionally, rooftop gardens and building catchment systems to retain stormwater on-site are recommended as part of sustainability effort. Figure 3-16 illustrates the recommended improvements. The above measures and recommendations set forth in the Draft Mauka Area Plan would combine to minimize any increase in storm water runoff and pollutants due to future development. Minimal adverse impacts would be anticipated, therefore, no mitigations are proposed.

Individual development and redevelopment projects in the Mauka Area will adhere to the requirements of both the City Storm Drainage design standards (“Rules Relating to Storm Drainage Standards,” January 2000) and Erosion Control design standards (“Rules Relating to Soil Erosion Standards and Guidelines,” April 1999).

Federal, State and City regulations require a minimum level of stormwater quality treatment for the stormwater collected and conveyed by a private drainage system (from new development or redevelopment disturbing more than one acre of land) before discharging into the City’s drainage system within the public roadways. For the Mauka Area, the drainage system ultimately discharges to receiving coastal waters. The purpose of the water quality criteria is to reduce the discharge of pollutants carried by storm water to receiving waters to the “maximum extent practicable.” The methods of reducing surface runoff quantities above would improve the quality of drainage water they accommodate. Each individual applicant for a City Building Permit shall need to address storm water quality requirements for their specific project in accordance with Section II of the City’s “Rules Relating to Storm Drainage Standards.” Existing catch basins within the public roadways have no designed capability to remove sediments and pollutants carried by storm water runoff. Commercially available filters are recommended for

insertion directly into existing catch basins or extensive retrofit modifications are recommended to the structures that are capable of removing oil and grease, trash, debris and sediment. These filter inserts would need to be regularly inspected and replaced to maintain their effectiveness.

Each individual applicant for a City Building Permit shall be required to submit for approval a “Site Development Master Application for Drainage Connection License,” for their project specific drain connection. Other City permits may be applicable—trenching permit for work within the City’s rights-of-way for their specific project, as applicable; and a dewatering permit to discharge dewatering effluent into the City’s municipal separate storm sewer system (MS4) for their specific project, as applicable.

All wastewater plans submitted for projects in the Mauka Area shall meet the State Department of Health Rules, Hawaii Administrative Rules Chapter 11-62, “Wastewater Systems.” Detailed wastewater plans shall be submitted on a project-by-project basis to the DOH for review and conformance with applicable rules. Standard comments for the different DOH regulatory branches—Wastewater Branch, Clean Water Branch, etc.—are available on the DOH website (<http://hawaii.gov/health/environmental/env-planning/landuse/landuse.html>). Any project in the Mauka Area and its potential impacts to State waters must meet the Antidegradation policy outlined in HAR, Section 11-54-1.1; designated uses outlined in HAR, Section 11-54-3; and water quality criteria outlined in HAR, Sections 11-54-4 through 11-54-8. National Pollutant Discharge Elimination System permits shall be obtained on a case-by-case basis for applicable projects that involve discharge(s), including storm water runoff, in or to State waters. Notice of Intent forms for different types of discharge shall be submitted to the DOH on a case-by-case basis for projects that would discharge in or to Class A or Class 2 State waters. Examples of applicable discharge include:

- Storm water associated with construction activities that result in the disturbance of equal to or greater than one acre of total land area;
- Treated effluent from leaking underground storage tank remedial activities;
- Once-through cooling water less than one million gallons per day;
- Construction activity dewatering;
- Hydrotesting water; and,
- Circulation water from decorative ponds or tanks.

A separate NOI shall be submitted for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when a project is applying for coverage for discharges of storm water associated with construction activity. For any wastewater discharge type not mentioned herewith, an NPDES individual permit shall be obtained and its application submitted for processing no less than 180 days prior to the start of the discharge activity. All individual project applicants shall submit a copy of their NOI or NPDES individual permit application to the DLNR, SHPD for review, and subsequently demonstrate to the satisfaction of the CWB that the DLNR, SHPD issues a no-adverse effect determination for the subject project undertaking.

Individual projects in the Mauka Area shall be required to coordinate with the DOH and submit applicable NOI or NPDES individual permit application(s) for their proposed undertaking. Part of this process is to address potential project impacts to any affected impaired water bodies

(Clean Water Act Section 303[d]). Identified pollutants of concern are nutrients, suspended solids, pathogens and metals.

Aforementioned Federal, State and City programs on storm water quality treatment required for individual projects within the Mauka Area will collectively help to protect the long-term water quality of receiving waters. All discharges related to project construction or operation activities of individual projects, whether NPDES permit(s) and/or Section 401 Water Quality Certification are required, must comply with applicable water quality standards.

During the short-term construction period, storm runoff may carry increased amounts of sediment into the storm drain system due to erosion from exposed soils, which could subsequently impact the water quality of nearshore waters in the area. Adherence to the regulatory requirements, including the preparation of Drainage and Erosion Control Plans and supporting Reports with calculations, would mitigate discharge of sediment runoff and pollutants resulting from construction activities. Additionally, regular monitoring and maintenance of the erosion control measures at construction sites would further mitigate runoff sediment. During construction, localized stormwater runoff flow amounts may increase until stabilizing groundcover can be established. To protect coastal water quality, a drainage and erosion control plan and an NPDES Permit for construction stormwater discharges which specifies Best Management Practices to minimize water quality impacts would be procured from the DOH. Dewatering activities may be required to accommodate building foundations, as well as, installation of underground utility systems. Effluent from dewatering activities would be treated prior to discharge into any drainage system or surface waters. Construction dewatering permits would be required by the City Department of ~~Public Works~~ Environmental Services (ENV) and DOH pursuant to City Ordinance and Section 11-5-34.08(b) HAR, respectively. Best Management Practices plans, which specify mitigative methods, such as, containment berms and detention ponds, would be prepared to control discharge of effluent resulting from dewatering activities.

During construction, runoff may enter the existing municipal drainage system particularly during rainy periods and sprinkling activities needed for dust control. Temporary cofferdams, debris-sediment traps or alternative methods may be employed at drainage outlets to mitigate potential water quality impacts. These measures would trap a majority of the sediment and debris which may otherwise flow to coastal areas. In addition, erosion control measures and site-specific BMPs would be designed in conjunction with each redevelopment and infrastructure improvement project within the Mauka Area. NPDES Permits would be required by the DOH for discharges to State waters as a result of construction clearing, grubbing and grading, or construction dewatering activities, pursuant to Section 11-5-34.08(b) HAR. Drainage and Erosion Control Plans which specify appropriate mitigative measures would be prepared to control discharges of effluent resulting from both construction and dewatering activities. Where possible, Best Management Practices would be incorporated in open spaces and recreational areas to minimize the discharge of pollutants into the drainage system and ultimately coastal waters from storm water runoff.



**Figure 3-17 Storm Drain Systems - Master Plan for Year 2030**

- Existing Drain Line
- Mauka Area (Project Boundary)
- New Drain Line (18")
- New Drain Inlet/Catch Basin
- 42" Existing Pipeline Size and Callout Tag
- Leader

0 800 1,600 Feet

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Sources: State of Hawaii, 1985, City & County of Honolulu, 2008, HCDA, 2008, M&E Pacific, Inc., 2008.

## Sanitary Sewer Systems

The existing gravity sewer system is undersized to accommodate land use and population projections out to the year 2030. Wastewater would tend to backup into residential units and businesses if improvements and pipe upsizing are not made to the sewer system. A total of approximately 18,000 feet of sewer trunk lines within the Mauka Area are recommended to be replaced with larger trunk lines under the Draft Mauka Area Plan. Figure 3-17 shows the recommended improvements. Construction limits/extents and locations would depend on the sequence or phasing of actual development and associated infrastructure improvements. The proposed improvements would minimize the possibility of wastewater backup. Proposed sewer system improvements would be sized to accommodate wastewater from Leeward Oahu areas neighboring the Mauka Area that passes through the Mauka Area en route to the SIWTP Sand Island WWTP via the AMSPS Ala Moana WWPS. In general, the Mauka Area sewer branch lines would be upgraded to 8 inches or larger in compliance with City standards, and necessary manholes and other supporting appurtenances.

The City Department of Planning and Permitting (DPP) Design and Construction (DDC), Wastewater Branch (WWB) Division (WWD) has recently adopted the INFIX 3.0 program to determine design sewer flow estimates based on anticipated individual lot usage and density. This program was utilized to evaluate the hydraulic capacities of the existing sewer system for existing and projected populations within the Mauka Area based on the proposed development standards stated in the Draft Mauka Area Plan. Based on the City's *Sewer Rehabilitation and Infiltration & Inflow Minimization Study* (December 1999), adjusted design parameters were determined for the average per capita wastewater flow, flow factor, dry-weather infiltration rate, and wet-weather infiltration rates. These adjusted design parameters were incorporated in the INFIX program. The table below summarizes the results for the AMSPS Ala Moana WWPS.

**Table 3-16 Projected Population and Sewage Flow—Ala Moana Sewage Wastewater Pump Station**

Description	Year 2000	Year 2030 INFIX Model	Year 2030 TAZ Estimate (Design Scenario)
Population (Thousands)	535	814	755 (65+690)
Average Per Capita Flow (GPD)	54	44	44
Average Sewage Flow (MGD)	28.7	35.8	33.2
Dry Weather Infiltration (MGD)	22.4	25.0	23.2
Design Average Flow (MGD)	51.1	60.8	56.4
Design Max Hourly Flow (MGD)	65	79	73
Wet Weather Infiltration (MGD)	107	110	110
Design Peak Flow (MGD)	172	189	183

Note: INFIX 3.0 population projection for Ala Moana SPS WWPS is 739,832 for year 2020. A 10% population increase was applied to project the population to year 2030 based on Table 1-1, Resident and De facto Population by Status, 1980–2030 (as of July 1) of the DBEDT, "Population and Economic Projections for the State of Hawaii to 2030," August 2004.

The tributary area for the AMSPS Ala Moana WWPS is 12,024 acres of which the Mauka Area encompasses approximately 450 acres (approximately 4 percent of tributary area). The INFIX 3.0 program projects an overall AMSPS Ala Moana WWPS tributary population of about 814,000 in the year 2030 for the Mauka Area and its surrounding areas. Based on City DPP traffic analysis zone (TAZ) geography, the year 2000 population within the Mauka Area was approximately 32,000 (6,000 residents and 26,000 nonresident visitors—workers or others). The

estimated year 2030 population within the Mauka Area based on TAZ geography is 65,000 (30,000 residents and 35,000 nonresident visitors—workers or others).

The DBEDT's "Population and Economic Projections for the State of Hawaii to 2030," August 2004, estimates a 37-percent increase in the State's population from 2000 to 2030. The year 2000 population of 535,000 consisted of about 32,000 within the Mauka Area, and 503,000 within the outside, remaining areas. Assuming the largest growth rate would occur in the Mauka Area, a normal growth rate is expected for the outside, remaining area that amounts to approximately 690,000 (37-percent increase) by the year 2030.

The year 2030 tributary population based on TAZ geography is about 8 percent smaller than the 814,000 from the INFIX 3.0 model and the corresponding Design Peak Flow is less by only 3 percent. This small difference is not significant in affecting the sizing of the sewer pipes for planning purposes. A reason for the small effect on the Design Peak Flow is that population does not affect the wet-weather infiltration, which is approximately 60 percent of the Design Peak Flow. Therefore, the design wastewater flows as determined by the INFIX 3.0 model is in line with population projections based on TAZ geography for the year 2030, and is established as the design basis to evaluate the sewer system.

City wastewater projections and planned improvements for the SIWTP Sand Island WWTP take in to account a region extending from Red Hill to Niu Valley and incorporating most of the nonresidential floor area on Oahu. This is generally the region within which Kakaako would capture a significant share of future growth. Hence, concentration of development in Kakaako would not significantly change the load on SIWTP Sand Island WWTP. The enormous peak capacity of planned City improvements to AMSPS Ala Moana WWPS and the force main between the AMSPS Ala Moana WWPS and SIWTP Sand Island WWTP would ensure sufficient capacity for the future needs of their total service area, which includes Kakaako.

Several segments of the existing gravity sewer lines need to be replaced with larger sewer lines. Approximately two miles of pipe ranging in diameter from 42 to 90 inches and approximately one mile of pipe ranging in diameter from 21 to 36 inches need to be installed. No adverse, negative impacts to the wastewater system are anticipated from the proposed improvements to the branch sewer lines since downstream facilities are adequate to accommodate the proposed increases in both pipe sizes and flows.

The conditions of the main sewer lines appear to be sufficient to last through the year 2030. However, the build-up and coagulation of fats, oils and grease (FOG) in the lines appears to be reducing the capacity of the line, especially near lateral connections to the mains. Restrictions on the FOG contribution to the sewer should be enforced. Oil/grease separators (grease traps) should be installed for high-FOG generating facilities, such as, restaurants and cafeterias. Existing FOG build up should be reduced in approximately 50% of existing sewer lines, primarily those not VCP, through the application of hot steam or water, chemical treatment, etc. to maintain proper operation and capacity of sewer lines. Coordination with the City is recommended to mitigate FOG buildup in Mauka Area sewer lines.

The City ~~Department of Public Works (DPW)~~ ENV regulates industrial wastewater discharges by permits and surcharges pursuant to Chapter 11 of the Revised Ordinances of Honolulu

(ROH). All future industrial and commercial activities within Kakaako would be subject to the provisions of ROH Chapter 11. Depending on the type of wastewater constituents, businesses may be required to provide pretreatment devices (such as, grease interceptors) to prevent the discharge of certain types of effluent into the municipal sewer system. All pretreatment devices must be approved by the City DPW ENV in order to meet industrial effluent limitations. Therefore, existing City regulations would ensure all industrial discharges are within acceptable limits.

Each individual development and redevelopment project within the Mauka Area will revise the wastewater master plan (including the HCDA as their Improvement Districts are determined, identified, and proposed for construction) on a project-by-project basis. Coordination will be made with the City Department of Planning and Permitting (DPP), Wastewater Branch (WWB) and their design criteria will be followed.

Each individual applicant for a City Building Permit shall be required to submit for approval a “Site Development Master Application for Sewer Connection,” for their project specific sewer connection. Other City permits may be applicable—trenching permit for work within the City’s rights-of-way for their specific project; and a dewatering permit to discharge dewatering effluent into the City’s municipal separate storm sewer system (MS4) for their specific project. The City’s “Design Standards of the Department of Wastewater Management, Volume 1,” dated July 1993 currently provides the basis and criteria for individual applicants of City Building permits on a project by project basis. Additionally, this document, as amended, will provide the wastewater design basis for the HCDA as their Improvement Districts are determined.

All wastewater plans submitted for projects in the Mauka Area shall meet the State DOH Rules, HAR Chapter 11-62, “Wastewater Systems.” Detailed wastewater plans shall be submitted on a project-by-project basis to the DOH for review and conformance with applicable rules. Standard comments for the different DOH regulatory branches—Wastewater Branch (WWB), Clean Water Branch (CWB), etc.—are available on the DOH website (<http://hawaii.gov/health/environmental/env-planning/landuse/landuse.html>).

Lessee(s) of the historic (defunct) Kakaako Ala Moana Pump Station would be made aware that the adjacent AMSPS may emit fugitive odors and noise that could adversely impact operations. The lessee would also be encouraged to take appropriate measures, as needed, such as enclosing the building, providing air conditioning, and sealing manhole covers to mitigate potential adverse odor and noise impacts.

### Solid Waste Disposal Program

Approximately 1.76 million tons of solid waste is generated in the City and County of Honolulu annually. ~~Through the efforts of~~ Although densification and redevelopment would generate more solid waste than the existing condition, specific improvements and modifications to the solid waste disposal program within the Mauka Area are not proposed. The existing mix of private and public collection services would expand to meet future collection demands as generated due to increases in population. Increased generation of solid waste could result in raised levels of odors from and visibility of refuse. However, odor-containment, visual shielding with building structures or vegetative barriers, and frequent solid waste removal from the Mauka



Area to outside disposal areas would mitigate these concerns. Therefore, no significant impacts are anticipated and no mitigation measures are proposed.

Solid waste collection and disposal systems and services would increase as demands for services increase in the Mauka Area. There would likely be an increase in the demand for private refuse collection services as commercial office and retail development occur.

As a result of Oahu's diminishing disposal capacity for solid waste, both the State and City have set aggressive waste reduction goals over the past several years. The State, through Act 324, SLH 1991, intended to reduce solid waste by 50 percent less than 1991 levels by the year 2000. The objective of the City was to reduce solid waste by 75 percent by the year 2000. In order to complement these waste reduction goals, the project's design would consider incorporating diversion and reduction activities into its uses, such as, providing separate trash bins for recyclable waste materials.

### Water Systems

Average daily water (maximum daily domestic demand plus fire flow requirements) consumption in the Mauka Area is projected to increase from about 8.06 mgd currently to 21.45 mgd in the year 2030. By comparison, it is estimated that average daily island-wide municipal water demand would increase from about 155 mgd currently to approximately 185 mgd to 200 mgd in the year 2030. The anticipated 30 mgd to 45 mgd increase in demand from the present to the year 2030 would be used primarily for Leeward Oahu. Due to conservation efforts and increased recycled water use, potable water use has remained at the same levels for the last 17 years since 1990, despite growth in population, housing and jobs. The City has reduced its demand on groundwater use with the construction of the Honouliuli Water Recycling Facility in the late 1990's using 4 mgd of recycled water from the wastewater treatment plant for irrigation of the West Loch and Ewa Villages community parks, roadway landscaping, and golf courses. Additionally, the City plans to convert the existing irrigation systems of the City of Kapolei and various City parks in Ewa from potable to recycled water use by June 2008.

The City has completed a water conservation project involving water fixture retrofit for City facilities. The BWS funded \$500,000 on a 2003 project, which retrofitted 2,822 water fixtures in 99 City facilities with low-flow shower heads, automatic flush valve toilets, urinals and faucets. This project saved an estimated 20 million gallons in its 1-year evaluation period. Neal S. Blaisdell Center reduced its water usage by about 7 million gallons. This effort also reduced wastewater generation and contribution to the sewer system. The City plans to continue its on-going coordination efforts and water conservation projects and programs to improve the efficiency of the water system and minimize increases in water demand:

- Leak detection and repair of the BWS distribution system and storage facilities;
- Pipeline corrosion protection to extend the life of water mains and reduce water loss in the system;
- Repair breaks and replace water mains and fire hydrants as required by condition to improve system efficiency; and,
- Coordinate trenching for water system improvements with road resurfacing and improvement projects.

The City plans the following future actions for water conservation and improved water system efficiency:

- Water audits of City buildings and parks to identify leaks, breaks and inefficient water fixtures and practices;
- Meter reading and water bill monitoring to identify high-water use due to undetected leakage;
- Create City policy to purchase Water Sense appliances when available that would use water efficiently;
- Retrofit City facilities with waterless urinals;
- Pilot rain barrel catchment systems for small landscaping around City facilities to supplement potable water irrigation;
- Connect the H-Power facility to the recycled water system;
- Install a recycled water pipeline from the Wahiawa Wastewater Treatment Plant to Miliani District Park and Central Oahu Regional Park; and,
- Construct a Membrane Bioreactor Recycled water plant at the City Ala Wai Golf Course to treat wastewater within the site to provide irrigation water.

New offsite water sources would need to be developed since existing BWS sources are currently operating at near capacity. New wells are planned in Leeward Oahu. Water from planned BWS wells on Windward Oahu would be transmitted to Hawaii Kai, freeing water that is consumed there to be used elsewhere within urban Honolulu via the BWS' ahupuaa water sharing program and on-going developed comprehensive water conservation program that is in alignment with and supports the BWS mission of "Water for Life, Ka Wai Ola," which balances the three components of sustainability: resource, economic, and organizational sustainability. In fulfilling this mission, the BWS seeks to ensure the sustainability of the island's water resources and to enhance the quality of life for the people of Oahu by providing world-class water services in a manner that:

- Protects the environment, including groundwater, watersheds, streams, and shoreline areas; and,
- Supports Oahu's economy while working to achieve sustainable water supplies for future generations.

Water conservation and watershed management are important water resource strategies in a diversified groundwater and alternative water supply approach to meeting future demands. Natural resources on the island of Oahu are limited and the energy needed to transport water is imported and subject to uncertain global forces. The BWS wishes to instill in residents and visitors that wise water use must become inherent, as does an understanding that freshwater is precious and must be conserved for future generations.

The BWS is also considering the possibility of exchanging brackish groundwater for potable well and tunnel water used to irrigate sugar cane on the Ewa Plain, and tapping springflow now disposed of at HECO's Waiiau Shaft. Desalination of either brackish or seawater is also possible, although less desirable, at this time because of cost.

As water use increases in Ewa, the City plans to renovate the Kapolei brackish water desalination plant and pilot renewable energy systems, such as, directed solar arrays, to offset the

higher energy needs. Renovation of the Kapolei brackish water desalination plant and installation of renewable energy systems is planned by the City for completion by the year 2030. The BWS is also investigating the desalination potential for a plant in Kalaeloa.

In general, environmental constraints and growth in island population have led the BWS to pursue water development projects which are relatively expensive. Since water rates are uniform throughout Oahu, this would result in higher water charges to all households and businesses. Availability of sufficient water on Oahu is not so much an issue as whether new water sources would be developed in time to meet the demand and at what cost. Brief moratoria on new building permits have occurred on Oahu when water supply was not sufficient for new water service connections.

The conditions of the water mains appear to be sufficient to last through the year 2030. Several segments of the existing waterlines need to be upsized to accommodate projected growth to the year 2030 and maintain BWS-required flows and pressures in lines and facilities. About 1.4 miles of 18-inch diameter waterlines and approximately 1.6 miles of 16-inch diameter waterlines need to be upsized. The proposed improvements would support year 2030 projections; therefore, no significant impacts are anticipated and no mitigation measures are proposed. Refer to Figure 3-18 for a visual summary of the recommended waterline improvements.

Water supply allocation for Mauka Area improvements would be obtained from the State Department of Land and Natural Resources, Water and Land Development Branch, which would either purchase water supply from the BWS or develop new sources. Developers of parcels owned by the State or Bishop Estate would be required to obtain a water allocation for source from the respective landowner and they would be required to pay the BWS' Water System Facilities Charges. As required, the proposed water system improvements would be upgraded in accordance with the standards of the BWS. The HCDA would also explore alternative water systems, such as, the potential of accommodating a nonpotable water systems for irrigation purposes, thereby reducing potable water requirements.

Because redevelopment within the Mauka Area would not significantly affect overall total island employment and population growth, it would not significantly change future municipal water demand regionally within Leeward Oahu. Businesses and residents would consume roughly the same amount of water regardless of where they are situated on Oahu. Mixed uses, per se, would not significantly affect the amount of water use of the amount of wastewater generated by various kinds of water users.

Each individual development and redevelopment applicant for a City Building Permit shall be required to provide a water supply capable of supplying the required fire flow for fire protection to all premises, and shall be required to be in compliance with the prevailing applicable City Uniform Fire Code by submitting civil plans to the City Honolulu Fire Department (HFD) for review and approval. Each individual applicant for a City Building Permit shall be required to provide the BWS with project specific water demands and infrastructure, and meet these criteria for specific projects. Specific projects within State lands requiring water service from the BWS will be required to pay a resource development charge, in addition to Water Facility Charges for transmission and daily storage. General overall water demands and calculations are contained in this infrastructure plan which will be included as part of the FSEIS. In addition, each individual

applicant for a City Building Permit will be required to provide project specific water demands and calculations to the City Engineering Division. The BWS will determine the availability of water on a case by case basis during their processing of specific City Building Permit applications.

#### Electrical Power, Telephone, Cable Television, and Communication Systems

Based on the zoned land use and a maximum allowable FAR of 3.5, development of parcels within the Mauka Area under either the current or revised plans would create a projected increased load of 224 Mega Volt-Amperes (MVA). This would warrant the development of at least one Substation and may require investigation into the provision of a second substation site.

At present, HECO. indicated that it has the capacity to provide electric service without development of their Cooke Street substation site. However, based on present development trends in the Mauka Area, HECO. foresees the need for the Cooke Street Substation development within 5 years. Depending on load growth beyond 10 to 15 years, HECO. may indicate the need for the second substation. The increased loading would also require HECO. to plan for their expansion of their generating capacity, as well as investigate means of increasing their system capacity by “off-loading” electrical demand onto alternate sources. Figure 3-19, Figure 3-20, and Figure 3-21 provide visual summary of the recommended improvements as they pertain to electrical power, telephone and communications, and cable television, respectively.

Since there are inherent physical constraints to existing overhead lines which limit the amount of additional capacity that may be added to service large developments, consolidation and development of parcels within the Mauka Area may also entail undergrounding of existing overhead lines along the following roads:

- Alohi Way;
- Rycroft Street;
- Hoolai Street;
- Kamaile Street;
- Piikoi Street;
- Auahi Street;
- Pohukaina Street;
- Queen Street;
- Halekauwila Street;
- Kawaiahao Street;
- Waimanu Street;
- Kona Street;
- Hopaka Street; and,
- Keawe Street.

#### Traffic Signal Systems

Impacts from increased traffic flows around and through the Mauka Area are discussed in Section 3.7.2, Traffic. Mitigation measures set forth in the Traffic section call for: (1) retaining the existing one-way couplet between Pensacola and Piikoi Streets, and (2) signaling the

intersections at Queen Street / Kamakee Street, Halekauwila Street / Cooke Street and Pohukaina Street / Cooke Street (Figure 3-22). Should these measures be implemented, it is anticipated that signal timing adjustments would be incorporated to optimize traffic flow and there would be no impacts to the traffic signal system. Therefore, no mitigation measures are proposed.

### Roadway Street Light Systems

Figure 3-23 provides a visual summary of the recommended improvements. No adverse impacts would be expected to the area's roadway street light system, assuming upgrades are implemented as needed. Therefore, no mitigation measures are proposed.

### Roadways

Improvements to roadways are designed to meet or exceed City standards. Proposed street and roadway improvements include:

- Asphalt concrete (AC) pavement resurfacing;
- Widening and adjustment of ROW widths to conform with minimum City standards; and,
- Installation of concrete curbs, gutters, medians, planters and sidewalks, as applicable.

Figure 3-24 provides a visual summary of the recommended roadway improvements.

One of the principal benefits of the Draft Mauka Area Plan would be a significantly improved vehicular, bicyclist and pedestrian circulation system. Key streets would be widened to provide increased roadway capacities to allow traffic to flow more smoothly within the Mauka Area. Exclusive bicycle lanes and pedestrian walkways/corridors would be provided on streets. The proposed improvements would enhance traffic and pedestrian/bicyclist circulation while simultaneously improving the drainage condition of roadways and minimizing localized ponding occurrences; therefore, no significant impacts are anticipated and no mitigation measures are proposed.

Improvements to existing roadways would temporarily restrict vehicular and pedestrian traffic, disrupt business activity, cause a decrease in the overall quality of the environment, and affect commercial buildings and historic sites. In general, construction would be a major cause of inconvenience to the people living, working, having business, doing business in, or commuting through the Mauka Area.

Wherever possible, the locations of infrastructure and roadway improvements would be selected so that traffic would be able to proceed through the work area with the least amount of

inconvenience. However, depending on the amount of work involved, it may be necessary to close a portion of some roadways to motorists, bicyclists and pedestrians. To minimize this inconvenience, extended work hours for improvement construction work may be implemented, such as, 20- to 24-hour work days, with roadway reopenings to traffic as soon as utility trenches have been backfilled and a temporary pavement or traffic-rated steel plate has been laid over the work area to adequately support traffic. Roadway closures would also avoid the traffic rush



hours as much as practicable. Parking would not be permitted along the streets where construction is taking place, and where traffic is being diverted around the construction area. The use of construction workers or off-duty police officers to control traffic would be employed to facilitate traffic movement. Mitigation of the anticipated traffic congestion would be accomplished by a traffic control plan reviewed and approved by the City. Any temporary utility service connections to nearby businesses and residences would be installed to avoid disruption of continuous utility service. Any adverse visual impacts of construction debris, equipment and machinery along roadways being improved would be mitigated with temporary covers, screens and buffers.

Installations of new underground utilities within roadway rights-of-way will involve digging trenches, which will require trenching permits from the City. In the Mauka Area, where the ground water table is near the ground surface, ground water would likely seep into open excavations. Removing ground water (dewatering) from the construction area shall be accomplished on a case by case basis for individual specific projects. Dewatering activities will be subject to water quality requirements by the State Department of Health (NPDES program) and the City. State and City permits will be necessary on a case by case basis with project specific treatment requirements for the dewatered means and methods, and effluent type and quantity. A common practice of dewatering is to install a temporary barrier to divide the open trench into two sections—pump water from the work area section into the other or “back trench” section. A variation of this method would be to pump the ground water into a sedimentation tank and filter the water before the dewatering effluent is discharged into a nearby catch basin or drain inlet. Should dewatering effluent be discharged to the existing drainage system, dewatering permits for discharge to the MS4 will be required from the State, City or both.

In addition to dewatering activities, utility installation, parcel development / redevelopment, and roadway improvements also require compaction of the underlying soil and placement of fill and backfill. Specific compaction requirements will be determined on a case-by-case basis through site-specific geotechnical explorations and analyses performed during the construction phases of infrastructure installations and improvements. Site-specific soils reports also provide recommendations for earthwork, cut / fill slopes, water content, percolation, pavement design, retaining wall design parameters, etc. that are typically required for the design and construction of projects.

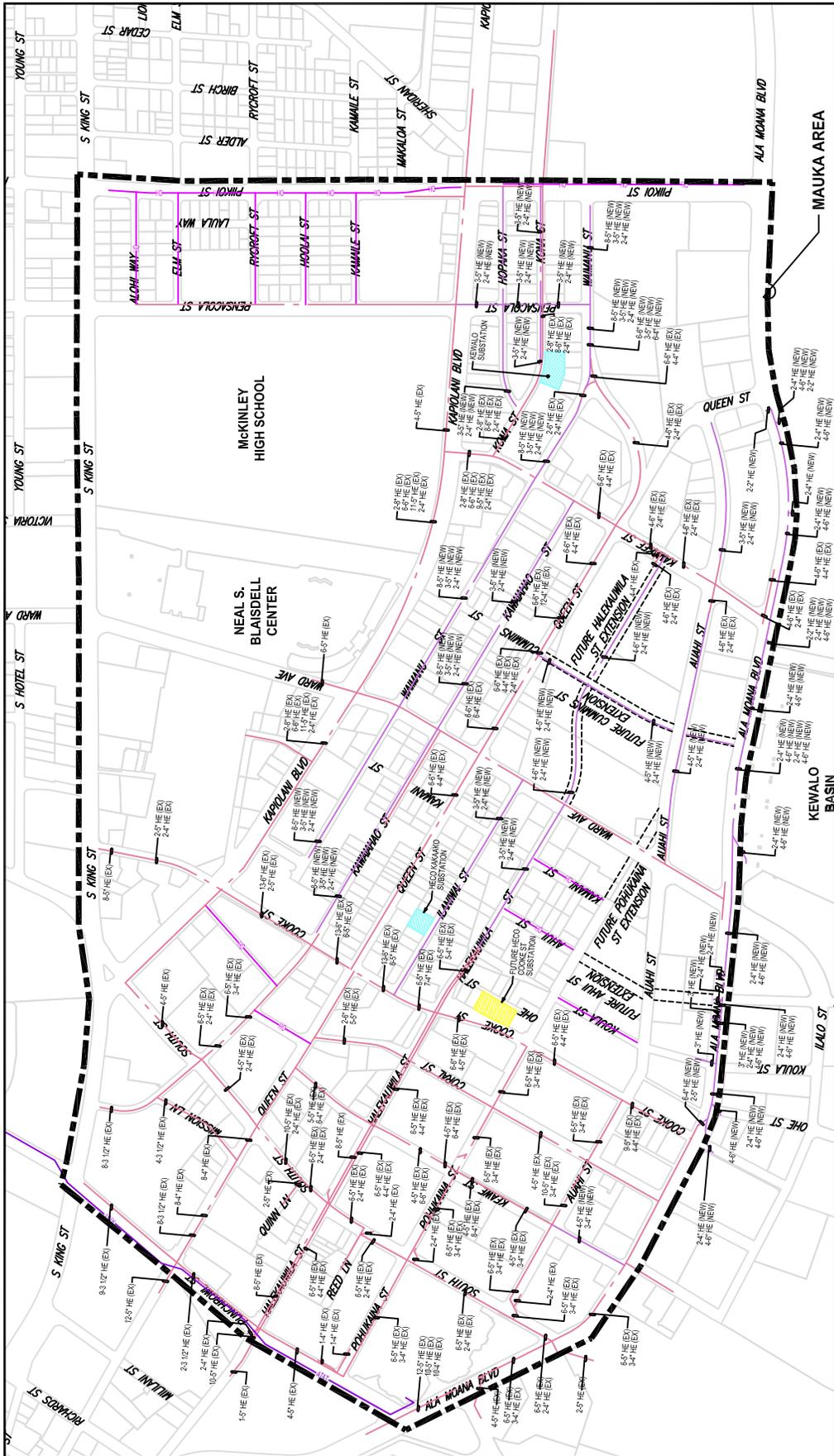
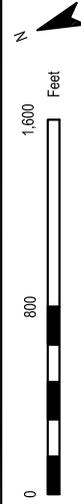


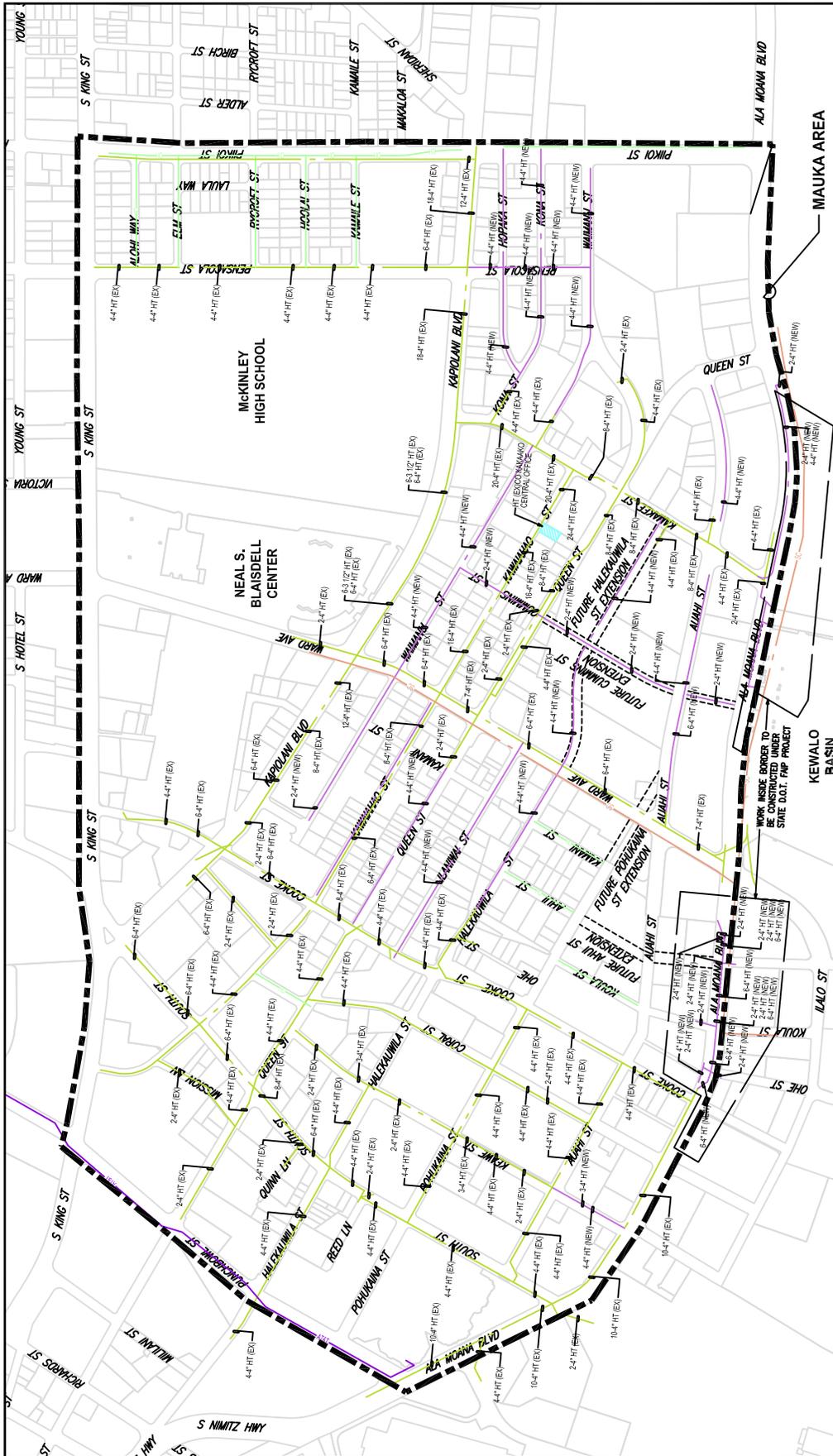
Figure 3-20 Electrical Power Systems - Master Plan for Year 2030

- Existing HECO Ductline
- Existing HECO Overhead
- New HECO Ductline
- Mauka Area (Project Boundary)
- Existing Conduit Size and Callout Tag Leader
- New Conduit Size and Callout Tag Leader



03/04/09 AECOM

Sources: City & County of Honolulu, 2008, HCDA, 2008, HECO, 2007, Ronald N S Ho & Associates, Inc., 2008.



**Figure 3-21 Telephone and Communication Systems - Master Plan for Year 2030**

— Existing Overhead Line  
— Existing Underground Conduit  
— New Underground Conduit  
— Existing Underground American Telephone & Telegraph Conduit and Cable  
— SC  
— Existing Underground Signal Corps Conduit and Cable  
— Existing Conduit Size and Callout Tag Leader  
— New Conduit Size and Callout Tag Leader  
 Mauka Area (Project Boundary)

— 4-4" HT (EX)  
— 4-4" HT (NEW)

0 800 1,600 Feet  
 N

03/04/09 AECOM

Sources: City & County of Honolulu, 2008, HCDA, 2008, HTCO, 2007, Ronald N S Ho & Associates, Inc., 2008.

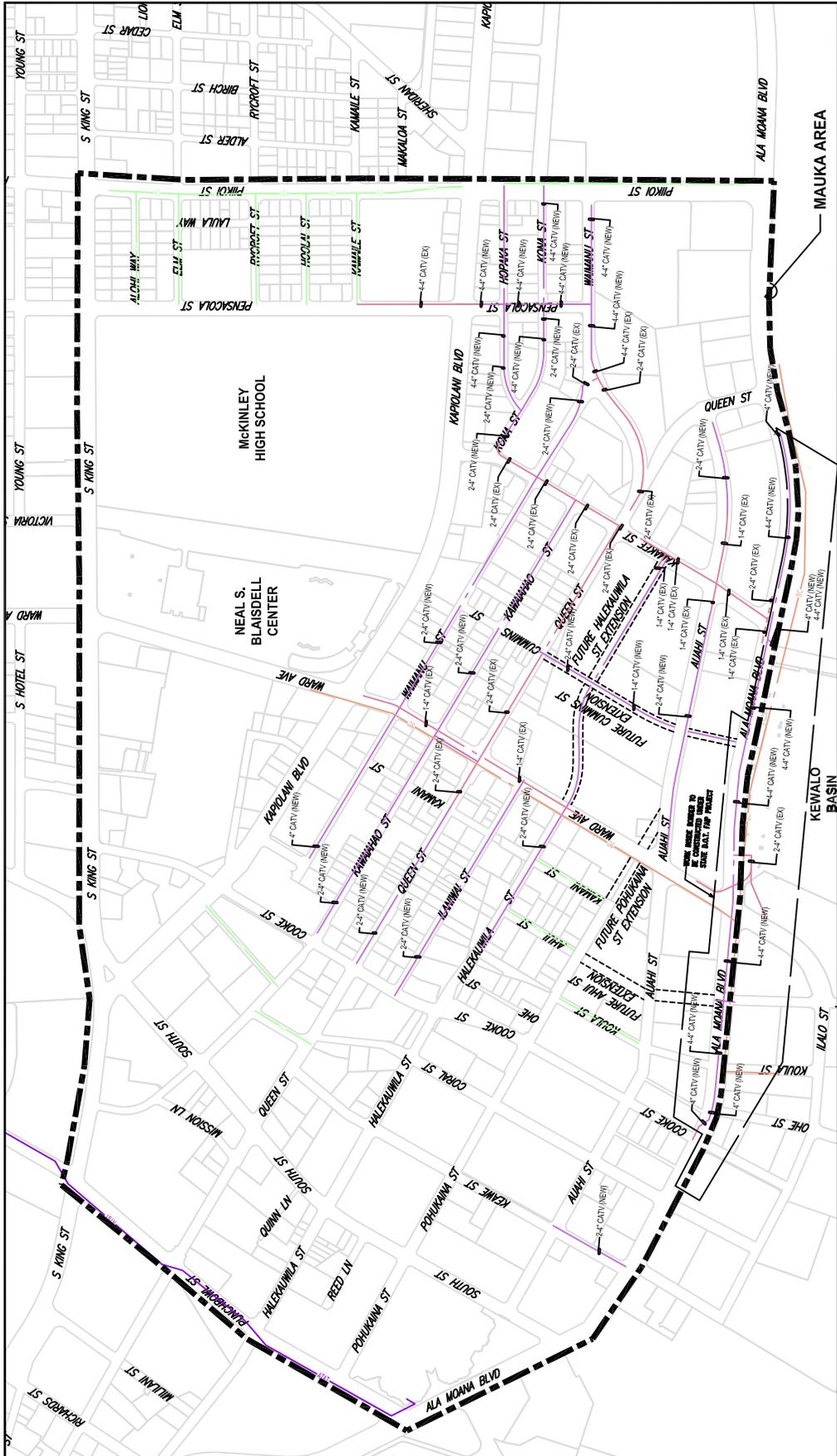
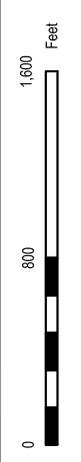


Figure 3-22 Cable Television Systems - Master Plan for Year 2030

- Existing Overhead Line
- Existing Underground Conduit
- New Underground Conduit
- Existing Underground American Telephone & Telegraph Conduit and Cable
- SC Existing Underground Signal Corps Conduit and Cable
- Conduit Size and Callout Tag Leader
- Mauka Area (Project Boundary)



03/04/09 | AECOM

Sources: City & County of Honolulu, 2008, HCDA, 2008, Oceanic-Time Warner Cable, 2007, Ronald N S Ho & Associates, Inc., 2008.



Figure 3-23 Traffic Signal Systems - Master Plan for Year 2030

- Existing City-Owned & Maintenance Traffic Signal
- Existing State-Owned & Maintenance Traffic Signal
- New City-Owned & Maintenance Traffic Signal
- Mauka Area (Project Boundary)



03/04/09 AECOM

Sources: City & County of Honolulu, 2008, HCDA, 2008, Ronald N S Ho & Associates, Inc., 2008.

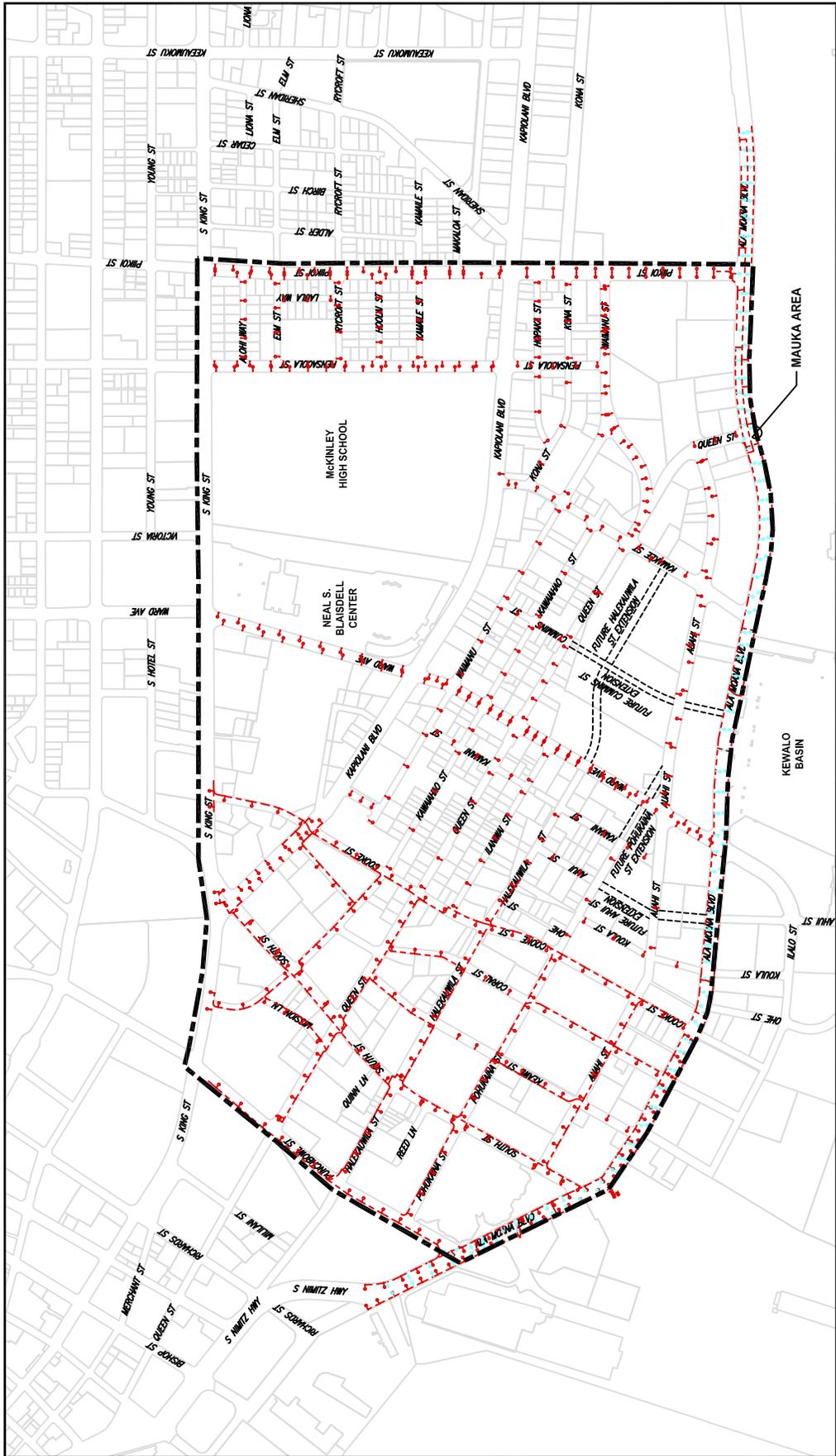
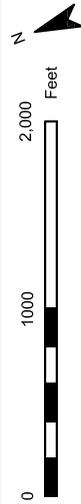


Figure 3-24 Roadway Street Light Systems - Master Plan for Year 2030

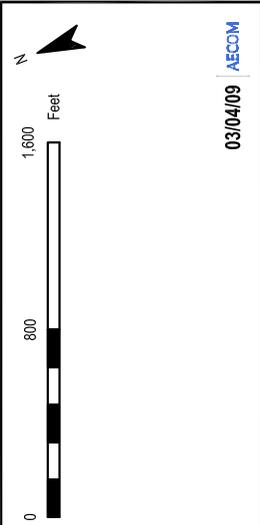
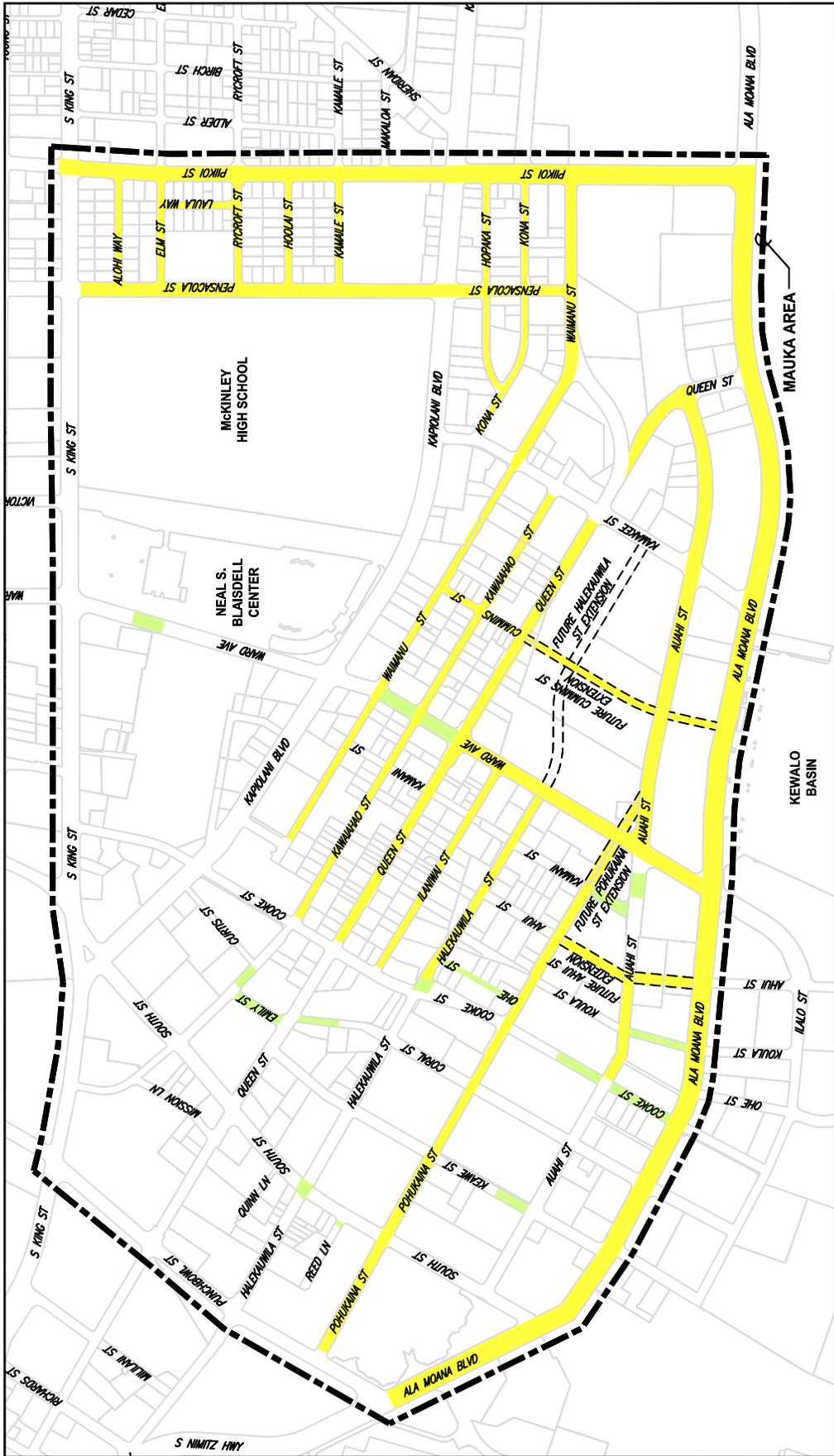
-  Existing Street Light
-  Existing Street Light Ductline
-  New Street Light

-  Mauka Area (Project Boundary)



03/04/09 AECOM

Sources: City & County of Honolulu, 2008, HCDA, 2008, Ronald N S Ho & Associates, Inc., 2008.



**Figure 3-25 Roadways - Master Plan for Year 2030**

- █ Roadway Improvements
- █ Possible Repair of Potholes, Alligator Cracking and/or Rutting
- Mauka Area (Project Boundary)

03/04/09 AECOM

Sources: City & County of Honolulu, 2008, HCDA, 2008, M&E Pacific, Inc., 2008.

## 3.14 Public Services and Facilities

With the projected population upwards of 30,000 residents in the Mauka Area by year 2030, the public service sources presently servicing the Kakaako residential population may anticipate the expansion of existing services available. The service sources include: education, police, fire, and medical.

### 3.14.1 Affected Environment

#### Educational Facilities

At present, the school age population residing in Mauka Area is served by seven public schools and charter schools (see Figure 3-26). Table 3-17 lists the schools, current enrollment, and school capacity. According to the DOE, school capacity is calculated by first counting the total or gross number of classrooms on a campus. The capacity is a net figure established by deleting classroom uses above and beyond those needed for basic regular education and special education programs.

With the exception to Washington Middle School, which serves the projected enrollment, the 2007-2008 student enrollments for the four schools serving the school age population of the Mauka Area is currently under capacity.

**Table 3-17 Capacity and Enrollment Projections for Schools Servicing the Mauka Area**

School	2007-2008 Enrollment	2009-2010 Enrollment Projected in 2005, 2006, and 2007	2011-2012 Enrollment Projected in 2006	2007-2008 Students over / under 2006-2007 Capacity	2011-2012 Students over / under 2006-2007 Capacity
Royal School	373	453, 369, 366	352	-55	-76
Kaahumanu Elementary	566	691, 524, 555	544	-104	-126
Central Middle	457	523, 398, 385	356	-240	-341
Washington Middle	1,032	876, 843, 893	837	0	-195
McKinley High School	1,857	2056, 1805, 1801	1,688	-295	-464

Source: DOE, January, April 2008

Notes: \*No pertinent data available on Voyager and Myron B. Thompson Academy, Public Charter Schools (PCS).

#### Police

The City and County of Honolulu Police Department, District 1, Central Honolulu, provide police protection services for the Mauka Area. District 1 covers the downtown Honolulu area from Liliha Street to Punahou Street and from Round Top Drive to Ala Moana Beach Park, including the Aloha Tower.

## Fire

The City and County of Honolulu Fire Department provides fire services for the Mauka Area through the Department's Kakaako, Pawaa, and Central stations. The Kakaako Fire Station services the area from Punchbowl to Kamakee Streets, nearly three-fourth of the area of the District. The Pawaa Fire Station provides service to the area between Kamakee and Piikoi Streets.

Major medical service facilities in the vicinity of Kakaako include Queen's Medical Center located on the corner of Beretania and Punchbowl Streets, and Straub Clinic and Hospital located on the corner of King Street and Ward Avenue.

### 3.14.2 Potential Impacts and Mitigation Measures

#### Educational Facilities

According to Table 3-17, it does not appear that the DOE anticipates the enrollment capability of the schools servicing the Mauka Area to become strained even during 2011-2012 school year. This may be due to a myriad of factors—slow redevelopment pace in the Mauka Area, the preference for families opting to live in single-family residences, which the Mauka Area lacks (in terms of new development), and/or the decrease in residential redevelopment projects. Determining enrollment needs on a project by project basis may help determine the necessity of additional educational facilities. There are no plans for additional public educational facilities in the Kakaako District. The former Pohukaina School site is tentatively set aside to accommodate grade school needs, if necessary. Future school needs in the Mauka Area shall be determined by the DOE.

#### Police

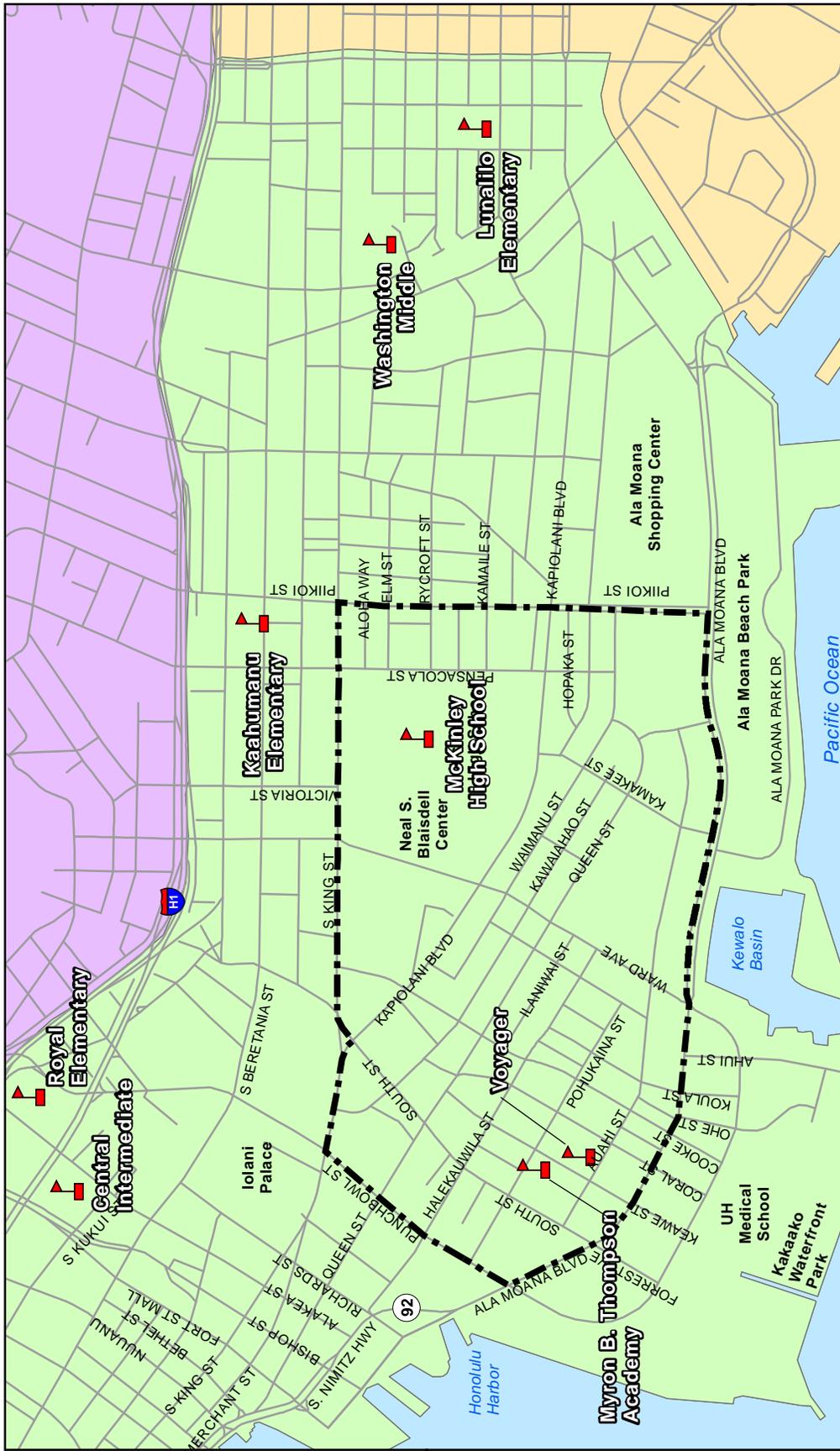
Additional police service provided by the City and County of Honolulu Police Department, District 1, Central Honolulu, for the Mauka Area will depend on the demand and the rate of development within the Kakaako District. Additional police service would presumably be funded out of increased real property tax revenues generated on a project-by-project basis. There are no plans for additional police facilities within the Kakaako District.

#### Fire

The City and County of Honolulu Fire Department, the Pawaa Fire Station services a portion of the Mauka Area between Kamakee and Piikoi Streets. Depending on what part of Kakaako is affected, service for major structural fires is also provided by the Central Iwilei, Kuakini, Makiki, and McCully fire stations. No additional fire stations are planned for the Kakaako project area.

#### Medical

The proximity of major medical facilities such as Queen's Medical Center and Straub Clinic indicates that adequate medical service will be available to the Mauka Area residents, workers, and visitors. Additional medical facilities are not proposed with the Mauka Area Plan.



N

0 500 1,000 Feet

**Figure 3-26 Schools Servicing Kakaako Mauka Residents**

	Mauka Area (Study Boundary)		McKinley		Roosevelt
	Schools		Kaimuki		

Sources: City and County of Honolulu, 2007; DOE, 2008; ED&W, 2008

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# Chapter 4

## Relationship to Land Use Plans, Policies, and Controls





## 4.0 RELATIONSHIP TO LAND USE PLANS, POLICIES, AND CONTROLS

This chapter describes the proposed action in relation to the applicable policies and controls of the federal government, State of Hawaii, and City and County of Honolulu.

### 4.1 Federal Policies and Controls

The following federal policies and controls may be applicable to the proposed Mauka Area Plan update.

#### 4.1.1 Coastal Management Act of 1972

Section 307 of the National CZM Act of 1972 [16 United States Code (USC) 111451 et. seq.] provides for State review of federal actions or permits affecting the coastal zone of states with approved CZMP. Hawaii's CZM program, established pursuant to Chapter 205A, HRS, is administered by the State Office of Planning (OP) and provides for the beneficial use, protection, and development of the State's coastal zone. A CZM Federal Consistency Review would be required in conjunction with an ACOE permit for improvements extending into the water. Prior to issuance of the ACOE permit, the OP must determine the project's consistency with the enforceable policies of the Hawaii CZM program. These policies encompass broad concerns such as impact on recreational resources, historic, and archaeological resources, coastal hazards, and the management of land development. Further discussion of the State CZMP is provided in Section 4.2.4.

#### 4.1.2 National Historic Preservation Act of 1966

The 1966 NHPA (16 USC 470 et. seq.) is applicable to five (5) historical structures identified in the Kakaako Mauka Area, which are: Kawaihāo Church and Grounds; Mission Houses; Old Kakaako Fire Station; portion of McKinley High School; and Royal Brewery Building. Further discussion of the objectives applicable to the historical resources in the Mauka Area is discussed in Section 4.2.4.

### 4.2 State Plans, Policies, and Controls

Various state plans, policies, and controls provide guidelines for development within the State of Hawaii. These guidelines range from the Hawaii State Plan, State Functional Plans, State Land Use Districts, and Kakaako Community Development District Plan. The following describes the relationship of the Draft Mauka Area Plan's update to these plans.

#### 4.2.1 Hawaii State Plan

The Hawaii State Plan, embodied in Chapter 226, HRS, serves as a guide for goals, objectives, policies, and priority guidelines for the State. The State Plan provides a basis for determining priorities, allocating limited resources, and improving coordination of State and County plans, policies, programs, projects, and regulatory activities.

The Draft Mauka Area Plan conforms to most applicable goals, objectives, policies, and priority guidelines of the Hawaii State Plan. The following elements describe the Draft Mauka Area Plan's relationship and compatibility to relevant State Plan goals, objectives, policies, and priority guidelines.

§226-5.b.1, 2, 3, 4 Population

*Manage population growth statewide in a manner that provides increased opportunities for Hawaii's people to pursue their physical, social, and economic aspirations while recognizing the unique needs of each county.*

*Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires.*

*Promote increased opportunities for Hawaii's people to pursue their socio-economic aspirations throughout the islands.*

*Encourage research activities and public awareness programs to foster an understanding of Hawaii's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaii's population.*

The Mauka Area is situated in an area designated by the City as the PUC. The PUC has been designated as a region to accommodate a substantial share of Oahu's present and future growth, with public investment in infrastructure and public facilities supporting the future development and economic activity being encouraged in the region. HCDA has projected the Mauka Area to accommodate approximately 30,000 residents in the next 25 to 30 years in mixed-use or standalone uses, which is less than the 45,000 projected 25 years ago. HCDA's policy to absorb a significant number of Oahu's population by supporting high-density development in the urban core continues to be central to the Draft Mauka Area Plan. This goal is compatible with the goal of PUC to accommodate a substantial population growth in the Mauka Area is in conformance with the State Plan objective on Population. HCDA encourages research activities and enhance public awareness programs to foster an understanding of Hawaii's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaii's population through public information (such as newsletter) and website.

Build-out of the Mauka Area is likely to occur in phases during the next 25 to 30 years. Development applications and requests for non-renewable resources such as water will be subject to review and conditions of approval by applicable County and State agencies on a project by project basis. Agency reviews are required to ensure that the existing supply of non-renewable resources can be adequately provided to address the need generated by each project.

The Draft Mauka Area Plan is consistent with population objectives as it encourages the development of physical, social, and economic opportunities for the people of the State of Hawaii. The overall goal of the Draft Mauka Area Plan, to create a community where people can live, work, and play, directly relates to the population policies. By continuing to allow horizontal and vertical mixed-use developments, the Draft Mauka Area Plan maintains HCDA's goal of enabling its residents, visitors, and workers to live, work, and play in the same area.

Increased physical, social, and economic opportunities will be provided by the development of commercial, social, and recreational facilities. Numerous employment opportunities can be anticipated by the creation of various land uses, thereby increasing economic activity. The unique mix of passive and active social and recreational facilities will enhance the mental and physical well-being of the people in the community. The development of different uses is likely to continue to attract potential residents, visitors, and workers to the Mauka Area because of its amenities, social and recreational activities, employment opportunities, and proximity to the ocean, central business district, Ala Moana, and Waikiki.

#### §226-6.b.2 Economy—In General

*Promote Hawaii as an attractive market for environmentally and socially sound investment activities that benefit Hawaii's people.*

The Draft Mauka Area Plan continues to uphold HCDA's goal of creating a sustainable development as stated in the existing Mauka Area Plan. The Draft Mauka Area Plan introduces components of the 1982 Plan that are modified to be more relevant today. Some of the updated components include: an urban design analysis, a transportation plan; cultural impact assessment, and an infrastructure plan, all of which center on HCDA's continued commitment to create / redevelop pedestrian-oriented development. The Draft Mauka Area Plan adheres to Smart Growth concepts, thereby helping to curtail urban sprawl and provide alternatives to automobile-dependence for its residents and visitors as a place to live, work, and play. An example is the Ward Entertainment Center, which has shops, restaurants, and theaters, developed under the Mauka Area Plan; it is popularly visited by Hawaii's working population and families. By promoting mixed-use development throughout the Mauka Area, residents and visitors alike can take advantage of Kakaako's central location and close proximity to other locations. By utilizing The Bus system or the proposed rail transit, residents and visitors can travel throughout Kakaako without being entirely dependent on automobile uses. Moreover, the Draft Mauka Area Plan proposes to improve pedestrian linkages throughout the Mauka Area, thereby improving and encouraging pedestrian access. The enhancement of the Mauka Area through the adoption of the Draft Mauka Area Plan further fulfills this objective.

#### §226-11.b.2, 3, 8 Physical Environment – Land-Based, Shoreline, and Marine Resources

*Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.*

*Take into account the physical attributes of areas when planning and designing activities and facilities.*

*Pursue compatible relationships among activities, facilities, and natural resources.*

#### §226-12.b.1, 3, 4, 5 Physical Environment – Scenic, Natural Beauty, and Historic Resources

*Promote the preservation and restoration of significant natural and historic resources.*

*Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.*

*Protect those special areas, structures, and elements that are an integral and functional part of Hawaii's ethnic and cultural heritage.*

*Encourage the design of developments and activities that complement the natural beauty of the islands.*

§226-13.b.2, 3, 5, 6, 7 Physical Environment – Land, Air, and Water Quality

*Promote the proper management of Hawaii's land and water resources.*

*Promote effective measures to achieve desired quality in Hawaii's surface, ground, and coastal waters.*

*Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.*

*Encourage design and construction practices that enhance the physical qualities of Hawaii's communities.*

*Encourage urban developments in close proximity to existing services and facilities.*

The Draft Mauka Area Plan contains provisions to ensure an aesthetically pleasing environment and a compatible relationship between land and nearby water activities in the adjoining Makai Area.

Building provisions include the introduction of the street-front, mid-height, and tower elements to promote active uses at street level and pedestrian-scaled building forms. Additionally, building heights along two segments of Ala Moana Boulevard, are reduced to 100 and 200 feet to enhance the pedestrian scale and encourage pedestrian activities. The maximum allowable building footprint is proposed to be reduced from 16,000 square feet to 9,000 square feet. To minimize the loss of Mauka-Makai viewing capabilities, the longer side of a tower must be orientated in the Ewa-Diamond Head direction.

The Draft Mauka Area Plan also introduces street/road classification. To encourage Mauka-Makai links throughout the district identified streets will be improved as “green” streets wherein improved landscaping, land uses that induce foot traffic, and aesthetic treatments will be applied to invite active pedestrian uses and promote physical activeness.

Efforts will be made to retain the history of the Kakaako District by preserving historic and cultural resources identified in the Draft Mauka Area Plan.

The existing Mauka Area Plan was prepared to accommodate substantial population growth in Kakaako—up to 45,000—to alleviate the burden of urbanizing and suburbanization of Oahu’s agricultural and rural lands. This goal is also supported by the City & County of Honolulu PUCDP, which recognizes Kakaako’s advantageous location to downtown Honolulu and job centers in Waikiki and Ala Moana. Significant population growth would be accommodated by expanding and/or upgrading existing utility infrastructure, rather than having to create new network of public works projects.

Redevelopment and new projects must be designed and constructed in compliance with the latest Uniform Building Code (UBC), which promotes public safety and provides standardized requirements for safe construction.

§226-14.b.1 Facility Systems – In General

*Accommodate the needs of Hawaii's people through coordination of facility systems and capital improvement priorities in consonance with state and county plans.*

§226-17.b.6, 10 Facility Systems – Transportation

*Encourage transportation systems that serve to accommodate present and future development needs of communities.*

*Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawaii's natural environment.*

HCDA will continue to invest in significant infrastructure improvement projects including drainage, wastewater, and water systems. From 1988 to 2007, HCDA has commissioned and completed several ID programs throughout the Makai Area.

The Draft Mauka Area Plan includes recommendations to improve the roadway system by installing curbs, gutters, sidewalks and street lighting. These improvements will improve traffic, pedestrian circulation, and heighten the aesthetic appeal of the area. Roadway system improvements include improving the accessibility between the Mauka and Makai Areas by incorporating landscaped islands in major thoroughfares (e.g., Ala Moana Boulevard) to serve as a place of “refuge” for pedestrians trying to cross major thoroughfares. Additionally, pedestrian realm and planter zones on either side of thoroughfares are also proposed to enhance the appearance of the area in proximity of major thoroughfares. Inclusion of bicycle lanes is also proposed to be accommodated by incrementally reducing the existing lane widths. The resulting roadway improvements would allow multiple uses along major thoroughfares. Implementation of roadway and utility improvements will be completed in accordance with applicable County and State standards.

The past and present ID programs to update and upgrade the Mauka Area’s infrastructure and utilities have been executed in a coordinated manner between HCDA and the affected population. Capital improvement priorities to fund these projects shall continue to be in consonance with State and County plans. Additionally, each ID program has been planned to ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.

The existing Mauka Area is serviced by TheBus system, which, due to the area’s close proximity to downtown Honolulu and Ala Moana/Waikiki, features a well-circulated route to and through the Mauka Area. The DTS proposed two mass transit stops in the Mauka Area is expected to enhance the public’s access to a reliable form of transportation, thereby further reducing the dependence on automobile travel.

## §226-19.b.1, 2, 3, 5, 6 Socio-Cultural Advancement—Housing

*Effectively accommodate the housing needs of Hawaii's people.*

*Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households.*

*Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.*

*Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.*

*Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.*

*Facilitate the use of available vacant, developable, and underutilized urban lands for housing.*

HCDA proposes to fulfill the intent of Chapter 206E-33.8, HRS (residential development, housing), by gearing toward a specific housing product type that targets the workforce or the gap-group instead of the entire affordable spectrum. The production of reserved housing is geared towards workforce buyers belonging in the 100 to 140 percent of the AMI group by ensuring that a portion of residential projects are set aside, or *reserved* for this income group. This means of providing housing solution for the gap group then frees up *affordable housing* stock for low and moderate income households.

Inclusionary housing requirements will be applied to minimize segregation of enclaves that are priced too high for low-to-moderate income families by using pricing and selective sales as a tool for promoting mixed-income communities. Inclusionary housing programs also allow innovative communities to create housing for their workforce, and enable families of moderate means to benefit from urban redevelopment. Mixed income communities broaden access to well-funded schools, strong municipal services, and emerging job centers. Building inclusionary units within the larger residential development is the ideal way to promote the reserved housing concept since it leads to greater economic and social integration as well as help to connect the workforce communities to regional opportunity.

For units purchased under the buy-back provision triggered by the homeowners decision to sell the unit prior to the expiration of the buy-back term, the purchase price is set as low as possible to the original reserved purchase price so the unit can be resold to another qualified buyer. Therefore, the buy-back price is based on the original reserved purchase price inflated only by an appropriate inflationary index and owner paid unit improvements. The implementation of this component increases homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing as the reserved housings to be built would be (most likely to be) in the Mauka Area, thereby fulfilling the policy set forth in Section 226-19.b.3, HRS.

Effective reserved housing program usually offers developers a range of cost offsets to achieve a double bottom line: reserved housing for residents and a reasonable overall return for the developer. Profitability in the Mauka Area is important to ensure that developers will actually build in Kakaako, and therefore should be factored into any win-win reserved housing formula, especially since the development of any reserved housing depends on the development of housing in general.

Developers will be required to construct reserved units that are similar or compatible in outward appearance to market rate units to provide cohesiveness in the physical appearance of a neighborhood helping to overcome negative perceptions of affordable housing.

Although HCDA's charter allows the provision of offsite reserved housing, the preference is to use on-site development to fulfill the requirement. In the event offsite reserved housing development is considered, HCDA may consider imposing additional requirements. Such requirements may include lesser credits for offsite reserved housing. Approved offsites may involve the use of available vacant, developable, and underutilized urban lands (Section 226-19.b.6, HRS).

The existing Mauka Area Plan contains provisions for the improvement, rehabilitation, and maintenance of existing housing units and residential areas, specifically in the Sheridan Tract area. The provisions were geared towards heavily residential areas such as the Sheridan Neighborhood, which, in 1980, contained up to 1,100 residences in the Mauka Area as the uniquely residential neighborhood in the predominantly commercial and industrial Kakaako.

§226-23.b.4, 5, 10 Socio-Cultural Advancement – Leisure

*Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.*

*Ensure opportunities for everyone to use and enjoy Hawaii's recreational resources; and*

*Assure adequate access to significant natural and cultural resources in public ownership.*

In addition to Mother Waldron ~~Neighborhood Park Playground~~, Queen Park, and two private passive parks open to the public in the Mauka Area, residents and visitors to the Mauka Area can enjoy additional recreational parks situated in the Makai Area, which include Kakaako Waterfront Park, and Kewalo Basin Park, as well as Ala Moana Regional Park. In addition, Thomas Square and Sheridan Community Park are located just outside of the Mauka Area. Provisions to improve existing street links to these facilities are proposed to enhance, improve, and invite pedestrian travel. Inviting pedestrian travel to these recreational facilities helps promote a healthy outdoor lifestyle. The Mauka Area has a cultural structure, the NBC, which is accessible for a fee and it serves as a popular revenue generating medium for concerts, musicals, and shows. These facilities, which are available to public for free (with the exception of the NBC), help meet the demand for a wide variety of social, cultural, educational, and recreational activities that are enjoyed by the public.

## 4.2.2 Hawaii State Functional Plans

State Functional Plans are prepared by various state agencies, with community input and focus on specific areas, including: agriculture, conservation lands, education, employment, energy, health, education, historic preservation, housing, human services, recreation, tourism, and transportation. The following elements describe the draft Mauka Area Plan's relationship and compatibility to applicable State Functional Plans.

### State Energy Functional Plan

Objective A: *Moderate the growth in energy demand through conservation and energy efficiency.*

Policy A.1: *Promote and stimulate greater energy efficiency and conservation in non-transportation sectors.*

Implementing Action A.1.d: *Provide technical assistance for energy conservation / efficiency projects for residential and commercial projects.*

Policy A.2: *Stimulate and promote greater energy efficiency and conservation in the transportation sector.*

Implementing Action A.2.a: *Provide assistance to counties, regional transportation management associations, and major employers in the development of ridesharing programs.*

The Draft Mauka Area Plan will facilitate energy conservation efforts by providing residential options near downtown Honolulu. The Diamond Head end of the Mauka Area is less than two miles from the central business district, and the residents have the option of driving a short distance by car, taking the bus, or walking to work. Additionally, passengers utilizing the proposed mass transit, which is planned to stop at two locations in the Mauka Area, will assist the effort to use a non-motorized vehicle alternative and reduce overall fossil fuel consumption. The use of energy efficient equipment in buildings will also contribute towards this effort as well. At present, HCDA is considering to adopt sustainability guidelines.

Under the guidance contained in the Draft Mauka Area Plan, projects in the Mauka Area will incorporate energy-efficient design principles where feasible. Design elements may include the use of individual meters for the residential and commercial/retail uses to provide incentives for energy conservation, high efficiency motors, chillers, energy-efficient ballasts for all fluorescent lamps, building design which maximizes indoor light without increasing indoor heat, use of insulation and double glazed windows and doors, and energy efficient metal halide lights for outdoor lighting. The Leadership in Energy and Environmental Design (LEED) Green Building Rating System, a third party certification program, is an available tool of implementing designs with minimal impacts to the environment.

### State Historic Preservation Functional Plan

Objective B: *Protection of Historic Properties*

Policy B.2: *Establish and make available a variety of mechanisms to better protect historic properties.*

Implementing Action B.2.b: Support and assist the County to protect historic properties through zoning ordinances and other mechanisms.

There are eight properties in the Mauka Area already placed on the SRHP/NRHP that are proposed to be protected by means of preservation, restoration, and rehabilitation.

### State Recreational Functional Plan

Objective II-C: *Improve and expand the provision of recreation facilities in urban areas and local communities.*

Policy II-C.1: *Meet the demand for recreational opportunities in local communities.*

The Makai Area supplements the existing recreational facilities present in the Mauka Area with the Kakaako Waterfront Park, Kakaako Gateway Park, Kewalo Basin Park, and Ala Moana Beach Park. Existing uses such as fishing, surfing, body boarding, sport fishing, dinner cruises provide for active outdoor recreational facilities for the enjoyment of the community. The usage of these existing facilities will be further encouraged by improving pedestrian access to these parks.

### State Educational Functional Plan

Cluster A.4: *Services and Facilities*

Policy: *Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.*

Goal: *Provide facilities that are sufficient in number, functional, well-paced and compatible with the physical surroundings.*

Although the existing school facilities are below capacity, in the event overcapacity is encountered, the Draft Mauka Area Plan proposes the use a portion of the former Pohukaina School site to address future concerns.

### State Transportation Functional Plan

Policy I.B.1: *Close the gap between where people live and work through decentralization, mixed zoning, and related initiatives.*

HCDA's goal is to create a community where people can live, work, and play in close proximity to their residences, jobs, and recreational sources, thereby reducing their dependence on automobile travel. To achieve the goal of creating a pedestrian-oriented environment, the Draft Mauka Area Plan promotes mixed-use developments in high density setting so that different land

uses can be clustered together. To facilitate pedestrian travel between the different areas, streets are proposed to be improved toward the goal of creating a more inviting walking experience for pedestrians. The proposed fixed guide rail in the Mauka Area will complement the existing TheBus system.

#### State Housing Functional Plan

*Policy A.2: Encourage increased private sector participation in the development of affordable for-sale housing units.*

*Policy A.3: Ensure that: 1) housing project, and 2) projects which impact housing provide a fair share/adequate amount of affordable homeownership opportunities.*

Reserved housing is proposed in the Draft Mauka Area Plan as a means to stimulate and promote feasible approaches that increase housing choices for the gap group households. Pursuant to the Draft Mauka Area Plan, residential development project on lots that measure at least 20,000 square feet triggers the reserved housing requirement. In return for providing reserved housing, developers could receive non-monetary offsets in the form of density or height bonuses, modifications to rules, and expedited permits. By linking the production of reserved housing to private development projects in the KCDD, the program can more efficiently expand the supply of moderately priced housing while dispersing these units throughout the KCDD to broaden housing opportunity and foster mixed-income communities.

To maintain the affordability of reserved housing units for qualified gap group households, the purchase price should be set as low as possible and comparable to the original purchase price. Therefore, the buy-back price should be inflated by only an appropriate inflationary index and owner-paid improvements. This way, the owner is able to retain some equity while keeping the housing stock still affordable for the future buyer. Programs with long affordability terms can call for a sharing of equity upon resale while providing the incentive of the creation of wealth and to avoid making reserved housing ownership financially less attractive for speculators. These terms allow the owner to build some equity while effectively eliminating profiteering.

### 4.2.3 State Land Use Districts

According to the State Land Use Commission, the Mauka Area is designated as an “urban” district. The Draft Mauka Area Plan does not propose any changes to this designation, and therefore, continues to conform to this designation.

### 4.2.4 Coastal Zone Management Program

The State CZMP was approved by the National Oceanic and Atmospheric Administration (NOAA) in 1978; the State OP is the administering agency for the State CZMP. The entire State of Hawaii is included in the State CZMP. The relationship of the CZM objectives and policies as they apply to the proposed updates to the Draft Mauka Area Plan are summarized as follows:

### Recreational Resources

*Provide coastal recreational opportunities accessible to the public.*

The Draft Mauka Area Plan proposes to increase the public access to nearby coastal recreational areas of Kewalo Basin Park, Kakaako Waterfront Park, and Ala Moana Beach Park by improving pedestrian connections between the Mauka Area and these areas. Specifically, in an effort to encourage walking and bicycling, as well as promoting a form of healthy outdoor lifestyle, the Draft Mauka Plan proposes to improve three “green” streets: Cooke Street, from the Pauahi neighborhood to the entrance of the Kakaako Waterfront Park; Kamakee Street, connecting the Auahi neighborhood to Ala Moana Beach Park; and Piikoi Street, connecting the Diamond Head end of the Mauka Area to Ala Moana Beach Park. By promoting “green” streets, HCDA’s goal is to provide an ability to practice alternative transportation on safer, quieter, and healthier streets for the residents and visitors alike.

### Historic Resources

*Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.*

The historic resources objective will be satisfied by the Draft Mauka Area Plan, which proposes to protect eight historic resources, out of which five are on the NRHP and six on the State HRHP, by means of preservation, rehabilitation, and restoration. Moreover, no action to alter or demolish these properties shall occur without prior approval by the DLNR for state resources and the NPS for national resources.

### Scenic and Open Space Resources

*Improve and expand the provision of recreational facilities in urban areas and local communities.*

Inasmuch as the Mauka Area is virtually built out and most of its lots have been accounted for by containing active uses, acquiring lots to provide publicly owned recreational facilities is difficult to achieve, if not infeasible due to land costs. Instead, the Draft Mauka Area includes provisions to improve pedestrian links to the existing recreational facilities, such as the Mother Waldron Neighborhood Park Playground, the proposed Queen Park, two private passive parks open to the public, as well as recreational and public space sources abutting the Mauka Area. Provisions to improve the Mauka-Makai links to these recreational sources by incorporating landscaping, inclusion of pedestrian-oriented commercial use, street improvements will likely invite and enhance the pedestrian experience.

### Economic Uses

*Provide public or private facilities and improvements important to the State's economy in suitable locations.*

The Draft Mauka Area Plan continues to uphold HCDA's policy to encourage mixed-use development in the Mauka Area; furthermore, standalone commercial uses would be allowed as well.

### Coastal Hazards

*Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.*

Although the Mauka Area is situated outside of the tsunami inundation zone, in the event of a disaster, the NBC and McKinley High School have been designated as disaster relief sites in cases of crises. Either site is situated outside of the floodplain and can accommodate a large number of persons as needed.

### Managing Development

*Improve the development review process, communication, and public participation in the management of coastal resources and hazards.*

The development process will utilize and implement existing laws and applications will be conducted in a timely manner. All developments would be subject to HCDA review and approval process, which is a public process. Developers shall obtain applicable permits and planning processes as necessitated by other local, state, and in some instances, federal agencies.

### Public Participation

*Stimulate public awareness, education, and participation in coastal management.*

The Draft to the Mauka Area Plan has been formulated with extensive public input and participation. Additionally, public input was sought for the preparation of this DSEIS in the form of SEISPN, which was submitted to the Office of Environmental Quality Control (OEQC) and noticed from December 23, 2007 to January 22, 2008. The DSEIS will be subject to additional input by the public upon submission to the OEQC. Most large-scale projects proposed in the Mauka Area are subject to public review process as well.

## 4.2.5 County Plans, Policies, and Controls

Pursuant to Act 153, SLH 1976, authority was granted by the State Legislature to the HCDA to supersede County ordinances. With the adoption of the Kakaako Community Development District and existing Mauka Area Plan and Rules, the HCDA has the overriding authority over certain local controls such as the Development Plan and Zoning. The Mauka Area Plan, however, continues to embody and foster the goals set forth in the County General Plan.

### Primary Urban Center Development Plan

Adopted in 2004, the PUCDP is one of eight development plans adopted to carry out the goals and intents of the Oahu General Plan. Its policies are used to shape the growth and development of the primary urban core in Honolulu, which includes Kakaako. Kakaako will absorb about 30 percent of PUC's future residential and commercial growth. Although conformance is not required, the Draft Mauka Area Plan and Rules are generally consistent with the vision stated in

the PUCDP. Policy 3.1.2 of the PUCDP pertains to open space network and calls for the preservation of panoramic views of natural landmarks and the urban skyline. The full build-out under the current Mauka Plan would result in near obliteration of the Mauka view of the Koolau Range referred to by the PUCDP; the Draft Mauka Area Plan lessens this impact by introducing provisions to reduce the bulk and mass of tower structures and changing the orientation of the longer façade of buildings from an Ewa-Diamond Head to Mauka-Makai orientation.

#### 4.2.6 Required Permits and Approvals

~~The SEIS must be approved by the HCDA’s board of directors before being subject to the Governor’s review. Upon acceptance by the Governor, the Draft Mauka Area Plan shall supersede the existing Mauka Area Plan and the City & County of Honolulu codes applicable to the Mauka Area. Projects approved by HCDA shall continue to be subject to permitting process at the City & County level. Table 4ES-1 lists the required approvals and permits.~~

**Table 4ES-1 Required Approvals and Permits**

<b>Permit or Approval</b>	<b>Authority</b>
Subdivision Approval (if applicable)	Department of Planning and Permitting
Building / Grading Permits	Department of Planning and Permitting
Installation of Power Lines and Substations	State Public Utilities Commission
National Pollutant Discharge Elimination System (NPDES)	State Department of Health
Noise Permit	State Department of Health
Modification of Highway Access Rights	Department of Transportation, Highways
Work Within the State Highway ROW	Department of Transportation, Highways
Dewatering	Department of Planning and Permitting
Trenching	Department of Health
Development Permit	Hawaii Community Development Authority

Source: EDAW, 2008

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# Chapter 5

## Contextual Issues





## 5.0 CONTEXTUAL ISSUES

### 5.1 Relationship between Local Short-Term Uses of the Environment and the Maintenance of Long-Term Productivity

Short-term uses and long-term productivity consist of short-term construction activities related to infrastructure upgrade and redevelopment projects and the long term benefits after the completion of each activity.

Construction activities would result in short-term impacts involving temporary and permanent alteration of land for grading, site work, infrastructure, and building. Localized degradation of air quality and increased noise levels would also occur in the short-term due to construction-related activities. Many short-term impacts can be avoided or mitigated by implementation of construction BMP. Applicable BMPs may include implementing erosion control measures, directing storm water run-off to detention/retention basins, and preventing the release of fuel or other contaminants. The trade-offs among these short-term impacts are the increase in employment and immediate economic benefits of construction-related activities.

In the long-term, the infrastructure and building construction conforming to the Draft Mauka Area Plan would facilitate maintaining the viability of existing businesses where adequate infrastructure is absent (such as Central Kakaako) and inviting new development of high density mixed-use developments where allowable. Due to the centrality of its location to downtown Honolulu, Ala Moana, and Waikiki, development of the Mauka Area may result in the conversion of existing uses to accommodate residential dwelling units to meet the demand for housing in “Town”. Due to rising land prices, the advent of new single-use only type development is less likely to occur (such as a single-family residence) in the next 25 to 30 years.

In the event structures are built to maximum allowable heights, the existing Mauka views of the Koolau Range may be eroded as seen from vantage points identified in the City and County of Honolulu’s PUCDP, and subsequently incorporated into the Draft Mauka Area Plan in the event structures are built up to the maximum allowable heights. The effect of adhering to development guidelines under the existing Mauka Area Plan has the effect of nearly eliminating Mauka views of the Koolau Range.

With the projected population increases, the volume of traffic coming in and out of, and passing through the Mauka Area is likely to increase. This will affect regional traffic patterns and volumes, and increases demands on infrastructure and public services. Roadway upgrades and creative traffic congestion methods are recommended to alleviate this concern.

With regard to long-term productivity, the Mauka Area has been successful at sustaining commercial, industrial, and residential uses, and will continue to accommodate mixed-uses in high density form on large lots. Implementation of the Draft Mauka Area Plan revisions will raise the quality of living by developing a pedestrian-oriented district, where people can access different uses by foot or the usage of public transportation including the proposed mass transit system, which is proposed to have two stops in the Mauka Area. Streets linking the Mauka Area to adjoining recreational and public spaces are proposed to be improved to encourage a form of

outdoor recreation and exercise that promotes a healthy lifestyle. Development guidelines have been modified to scale structures down and set buildings back in order to create “human-scale” developments, thereby, guiding development to ensure compatibility with the active, pedestrian-friendly outdoor setting. HCDA’s goal of creating a place where people can live, work, and play, would have an immeasurable affect on the quality of life for both residents and visitors in the Mauka Area. Lastly, by absorbing up to five times of the current population by 2030, redevelopment efforts in the Mauka Area would contribute towards curtailing suburban sprawl on Oahu.

Implementation of the Draft Mauka Area Plan is not anticipated to pose long-term risks to human health and safety. The proposed components of the Draft Mauka Area Plan are in compliance with all federal and state laws, policies, and rules.

Ultimately, positive long-term productivity outweighs short-term impacts and long-term inconveniences as discussed in the above-paragraphs. The implementation of the Draft Mauka Area Plan will contribute to the maintenance and enhancement of long-term productivity for the people of Oahu.

## 5.2 Cumulative and Secondary Impacts

The redevelopment and the gradual build-out of the Mauka Area is likely to affect its residents, visitors, and areas nearby, such as downtown Honolulu, Ala Moana, and Waikiki, and other parts of the city. Implementation of the Draft Mauka Area Plan, when added to other adopted and proposed projects of a similar nature, may have a significant affect on a regional scale, and at the island-wide scale. The Mauka Area is situated within the PUC, which has been designated to accommodate a substantial portion of Oahu’s population growth over the next 25 to 30 years. Implementation of the Draft Mauka Area Plan will provide employment, residential, commercial, industrial opportunities and is likely to jump start redevelopment efforts in the area.

There are other projects planned near the Mauka Area, including the recently updated and approved Makai Area Plan (2005), KS master plan update concerning its properties in the Kakaako District, the County-sponsored proposed mass transit stops in the Mauka Area with associated TOD, and GGP master plan, ~~which is currently being reviewed by HCDA~~. The implementation of the Draft Mauka Area Plan in light of each or all of the plans mentioned must be assessed to ensure all reasonable cumulative and secondary impacts are identified and mitigated to the fullest extent.

This section identifies secondary and cumulative impacts that may result from the proposed implementation of the Draft Mauka Area Plan.

### 5.2.1 Impacts on the Natural Environment

Assuming BMPs are followed and all permit-induced protocol are adhered to, no cumulative or secondary impacts are anticipated on the natural environment.

## 5.2.2 Impacts on the Human Environment

### Archaeological and Historic Resources

Due to the amount of *iwi* suspected to be contained in the Kakaako District, and the number of projects and the level of development being proposed, cumulative impacts are anticipated to impact this and potentially other archaeological resources. No new mitigation measures are being proposed due to strict SHPD regulations and protocol already in place.

### Visual Resources

The build-out of the Mauka Area under the Draft Mauka Area Plan will result in the impairment of the existing Mauka view of the Koolau Range. The implementation of the No-Action Alternative would result in near obstruction of this view. KS and GGP development projects would yield similar results since both are within the Mauka Area. View impacts caused by the Makai Area projects may be even more apparent due to the proximity of the view vantage points (Kakaako Waterfront Park in the Makai Area) to the projects. The elevated portion of the proposed mass transit may cause view impairment as well. Since the Draft Mauka Area Plan is a mitigation of the current Plan, no new mitigation measures are being proposed. Any view impacts suspected with the mass transit shall be assessed by the City and County of Honolulu.

### Transportation

Currently, the Mauka Area experiences traffic congestion during the morning and the evening peak hours. The congestion is caused by trips generating from, to, and through the Mauka Area. Regardless of the implementation of the Draft Mauka Area Plan, the Mauka Area population is expected to be increased to approximately 30,000 persons by year 2030. Although different land uses may generate varying number of users and the frequencies of uses, intensification of the existing properties in the Mauka Area to accommodate more uses than at present may compound the congestion anyway. The Makai Area's life science building complexes will not contribute to the ingress/egress traffic to the Mauka Area, but will congest its major thoroughfares, such as Ala Moana Boulevard. The Draft Mauka Area Plan proposes to mitigate this impact in several forms: continued utilization of TheBus for trips to and from the Mauka Area; future utilization of the mass transit to alleviate trips within the Mauka Area; instituting street hierarchy and exploring different approaches to divert traffic from major thoroughfares; and improving and enhancing streets to create an inviting, walking experience for the users to reach destinations within and the adjoining areas of the Kakaako District. No other mitigation measures are proposed as the combination of these efforts may alleviate the problem of congestion.

### Land Use

One of the beneficial effects of the implementation of a growth management plan such as the Draft Mauka Area Plan is that by accommodating growth in the highly urbanized Kakaako district through redevelopment, urban development or suburbanization by way of converting existing rural or agricultural lands on Oahu would be impeded. Additionally, presently developing regions would not be burdened with providing additional infrastructure needs to accommodate growth.

## Displacement

Redevelopment projects would affect existing residents and businesses by causing temporary and permanent relocation. Because commercial and residential developments tend to be more profitable, it is possible that they may eventually supplant industrial uses in Kakaako. Policies governing land use in Kakaako are structured to preserve industrial use in Kakaako. The overall strategy for Central Kakaako is to support the viability of small businesses while allowing for future potential future re-use of small properties through selective improvements to streets and parking. Urban design principles for Central Kakaako are proposed to be achieved by increasing density and height provisions for future developments, implement improvements to streets and infrastructure with the support of majority of property owners of the affected areas to minimize disruption and displacement, and developing a parking program in conjunction with the Improvement District for Central Kakaako. Through the Draft Mauka Area Plan public input process, Central Kakaako businesses expressed the need for as much flexibility as possible with respect to land use (mixed-use) and additional density and height for future developments. Examples include industrial-condo or cooperatives, which are currently permitted under the existing Mauka Area Plan and supported by the Draft Mauka Area Plan. In the event displacement occurs, public assistance for persons displaced by government-initiated projects are proposed to be provided. Households and businesses displaced by private sector actions will also be provided public assistance, short of monetary payments.

## 5.3 Irreversible and Irretrievable Commitments of Resources

Implementation of the Draft Mauka Area Plan revisions would result in the irreversible and irretrievable commitment of certain natural and fiscal resources. Major nonrenewable resource commitments include the project site and the financing, construction material, labor, and energy required for projects to be completed. Impacts represented by the commitment of these resources must be weighed against the positive socio-economic benefits that could be derived from the project versus the consequences of either taking no action or pursuing another less beneficial use of the area.

When fully built out in accordance with the Draft Mauka Area Plan, the area may transform to high density, mixed-use urban environment. More pedestrians, as well as vehicles on the roads can be expected. The construction of high rise buildings that contain mixed-use or single use developments within the Mauka Area will irreversibly erode Mauka view of the Koolau Range.

As with any construction activity, nonrenewable resources such as fossil fuel and construction material will be irrevocably committed. Labor will be required for planning, engineering, and construction. New residential, commercial, or industrial uses will generate increases in the demand for water, electricity, and sewer services. Similar types of development proposed on other parts of Oahu will generate the same or greater demand for these resources.

Providing potable water for consumption would commit additional groundwater resources. Even though at present, there is an adequate supply of water to sustain the projected population. It is noted here that the projected build out is intended to meet existing and projected population growth originating from Oahu and not new demand from outside, and these consumers would generate demand for new water resources regardless of their location.

## 5.4 Probable Adverse Environmental Effects that Cannot be Avoided

### Visual Resources

The construction of a series of vertical and horizontal mixed-use high-rise developments throughout the Mauka Area would degrade the existing Mauka view of the Koolau Range as seen from the Makai Area. Multi-story developments, specifically high rise structures within the Mauka Area would also be seen from other private and public, recreational, and gathering places such as McKinley High School, Ala Moana Beach Park, and Ward Centers. The build-out of the Mauka Area under the Draft Mauka Area Plan would have less impact on the Mauka view of the Koolau Range than under the No-Action Alternative, which permits building footprints to be built up to 16,000 square feet, resulting in bulkier and more massive structures.

### 5.4.1 Rationale for Proceeding with the Project Notwithstanding Unavoidable Effects

In light of the unavoidable effects on visual resources, continued redevelopment of the Mauka Area shall be guided by the draft Mauka Area Plan because potentially significant impacts will be minimized or offset by substantial positive benefits. The following are positive benefits resulting from the implementation of the Mauka Area Plan:

- Upgraded public works infrastructure (e.g., drainage, roadways, sewer systems);
- pedestrian-oriented development where different uses are accessible by foot travel or the use of a public transportation system;
- pedestrian-friendly link (“green streets”) to adjoining recreational areas, public spaces, and parks;
- provision of service, retail, construction jobs;
- the availability of housing choices in an urban core;
- helping to curtail suburban sprawl in other parts of Oahu; and
- intangible, elevated quality of living, working, and playing in a centralized location.

### 5.4.2 Unresolved Issues

The location of future public infrastructure improvements (phased as ID Programs) including roads, sewers, storm drains, communication, power, and water lines in the Mauka Area, the amount of funding is not known.

The extent to which other federal, state, and county funds and programs would be involved in present and future projects in the Mauka Area cannot be determined.

The rise in property taxes is an unresolved issue and is not exclusive to Kakaako, but is a statewide phenomenon.

Updates to the existing FIRM are currently being coordinated by DPP and DLNR. Re-designation of flood zones in the Mauka Area may result.

As a result of the existing urbanized environment of the Mauka Area, there may be a slight temperature difference in comparison to the overall climate of the region. It is not known at present what the temperature difference is.

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# Chapter 6

## Agencies and Parties Consulted





## 6.0 AGENCIES AND PARTIES CONSULTED

The SEIS Preparation Notice (SEISPN) was duly published in the December 23, 2007 edition of the *Environmental Notice*. During the comment period from December 23, 2007 to January 22, 2008, 29 written comments were received. The parties who provided written comments are identified by a checkmark (✓). Written comments received on the SEISPN are included in their entirety in Volume II: Appendix C (“Comments Received”) of this report.

### Federal Agencies

Department of Agriculture, State Conservationist  
Department of Interior, US Geological Survey  
Department of Interior, Fish & Wildlife Service  
Environmental Protection Agency Pacific Islands Contact Office  
National Marine Fisheries Service  
US Army Corps of Engineers, Pacific Ocean Division  
US Coast Guard, 14<sup>th</sup> Coast Guard District

### State Agencies

✓ Department of Accounting and General Services  
✓ Department of Agriculture  
✓ Department of Business, Economic Development & Tourism (DBED&T)  
DBED&T, Energy, Resources & Technology Division  
DBED&T, Housing Finance and Development Corporation  
✓ Department of Defense  
✓ Department of Education  
Department of Hawaiian Home Lands, Chairman  
✓ Department of Health, Environmental Planning Office  
✓ Department of Land and Natural Resources  
✓ Department of Transportation  
Legislative Reference Bureau  
Oahu Metropolitan Planning Organization  
✓ Office of Hawaiian Affairs  
Office of Planning  
University of Hawaii at Manoa (UH Manoa)  
UH Manoa, Environmental Center  
UH Manoa, John A. Burns School of Medicine  
UH Manoa, Marine Programs  
UH Manoa Water Resource Research Center

### Elected Officials

City Council Member Ann Kobayashi (District 5)  
City Council Member Charles Djou (District 4)  
City Council Member Rod Tam (District 6)  
✓ Representative Karl Rhoads (District 28)

- ✓ Representative Tom Brower (District 23)
- ✓ Senator Carol Fukunaga (District 11)
- Senator Gordon Trimble (District 12)

**City and County of Honolulu**

- Ala Moana/Kakaako Neighborhood Board
- ✓ Board of Water Supply
- Department of Environmental Services
- ✓ Department of Design & Construction
- Department of Community Services
- Department of Emergency Services, Oahu Civil Defense
- ✓ Department of Facility Maintenance
- ✓ Department of Parks & Recreation
- ✓ Department of Planning & Permitting
- Department of Transportation Services
- ✓ Honolulu Fire Department
- ✓ Honolulu Police Department

**Public Utilities**

- Hawaiian Electric Company, Inc.
- Hawaiian Telecom
- ✓ Oceanic Cable

**Other Interested Parties**

- American Lung Association, Environmental Health
- ✓ CUNA Mutual Group
- ✓ Gary Onishi
- ✓ General Growth Properties
- Honolulu Advertiser
- Honolulu Star Bulletin
- ✓ Kakaako Business and Landowners Association
- Kakaako Improvement Association
- ✓ Kamehameha Schools
- Outdoor Circle
- ✓ Servco Pacific
- Sun Press
- ✓ Tom Schnell
- ✓ Webster Nolan
- ✓ Waterhouse, Inc.

# Chapter 7

## Preparers of the Final Supplemental Environmental Impact Statement





## 7.0 List of Preparers

The Draft Mauka Area Plan EISEIS was prepared for HCDA by EDAW, Inc., 841 Bishop Street, Suite 1910, Honolulu, Hawaii 96813. Several consultants also provided key technical support in the preparation of the SEIS. Following is a list of the companies and associated individuals, including their respective disciplines and roles in the document.

### EDAW | AECOM

Name	Position	Role
Kevin Butterbaugh, MLA	Principal Planner	DSEIS: Project Manager & QA/QC
Komal Dewan	Senior Planner	Visual Resources Urban Design Analysis
Kristen Sohn	Planner	Project Coordinator Archaeological & Historic Resources Cultural Practices & Traditions Noise Air Quality Parks, Open Space Landholdings and Land Use Socio-Economics Public Services & Facilities
Craig Araki	Planner	Natural Resources
Xin Li	Planner, LEED AP	Visual Resources Urban Design Analysis
Chris Stoll, GISP	Planner/GIS Professional	GIS
Lorenda Lo, MLA	Planner, LEED AP	Document Production

### M & E Pacific | AECOM

Name	Position	Role
Martin Nakasone, P.E.	Principal Engineer	Engineer-in-Charge
Michael Nishimura, P.E.	Senior Engineer	Infrastructure Plan
Paul Inouye, P.E.	Engineer	Infrastructure Plan

### Ronald N.S. Ho & Associates, Inc.

Name	Position	Role
Steven H. Sakai	Senior Engineer	Electrical

### DMJM Harris | AECOM

Name	Position	Role
Jeffrey Chan, PTP	Senior Transportation Planner	Project Manager: Transportation Analysis
Ryan Park, P.E.	Senior Transportation Engineer	Task Manager: Transit / Multi-Modal Analysis
James Watson	Transportation Planner	Analyst: Traffic Operations Simulation
Anthony Mangonon	Transportation Planner	Analyst: Traffic Operations Analysis

### Austin, Tsutsumi, & Associates, Inc.

Name	Position	Role
Keith Niiya, P.E.	Chief Transportation Engineer	Project Manager
Matt Nakamoto, P.E.	Civil / Traffic Engineer	Traffic Operations / Signal Timing: Task Lead

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# Chapter 8

## References





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## Email / Personal Communications

Email communication with Peter Straus, Service Planning Manager, San Francisco Municipal Transportation Agency (SFMTA), March 2008

Email communication with Department of Education Staff, January and April 2008.

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# Appendix A

## Comments



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**Comments Received**

**Draft SEIS**

**7/8/2008 to 8/22/2008**







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REPLY TO  
ATTENTION OF

Joint Trunking System

DEPARTMENT OF THE ARMY  
30th SIGNAL BATTALION  
148 CURTIS LOOP, WHEELER ARMY AIRFIELD  
SCHOFIELD BARRACKS, HAWAII 96857-5020

13 AUG 2008

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Ms. Tamura:

In response to your letter dated July 8, 2008, concerning the Kakaako Community Development, the following comments are provided:

Upon review of the available drawings, documents, and correspondences, we have found Joint Trunking System communications cables C8285, C8103, C8106, and C8195 are within the project area. Enclosed are maps of the communications cable facilities within this area. All locations are approximate and cables must be located by toning and protected from damage.

During any project execution, should there be any unidentified communication cable damaged, please contact this office immediately. In the event that there are any modifications, extensions or changes to the proposed project, please notify this office immediately.

All actions will be coordinated with the 30<sup>th</sup> Signal Battalion through official correspondence. Additionally, should you need us to review and comment, or furnish other services on Army owned or managed infrastructure, we would appreciate your correspondence in the form of a memorandum or letter.

Please mail future requests to:

DEPARTMENT OF THE ARMY  
30<sup>th</sup> Signal Battalion  
148 Curtis Loop  
Wheeler Army Airfield  
Schofield Barracks, HI 96857-5020

Thank you for coordinating this review to prevent unforeseen expenditures. The point of contact for this action is Mr. Walter L. Selders, office (808) 656-8066, cell (808) 497-1331,

12496-11



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Lieutenant Colonel Joseph J. Dworaczek  
Department of the Army  
30th Signal Battalion  
148 Loop, Wheeler Army Airfield  
Schofield Barracks, Hawaii 96857

Dear Lieutenant Colonel Dworaczek:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter received on August 13, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan.

The Army's Joint Trunking System facilities (communication cables: C8285, C8103, C8106, and C8195) shall be included in the Mauka Area Infrastructure Plan as an existing facility. In the event of any modifications, extensions or changes that may impact the system, the 30th Signal Battalion shall be notified through official correspondence.

We appreciate your interest and participation in the environmental review process.

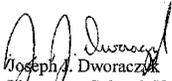
Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

and facsimile (808) 656-8069; alternate is Mr. Marion F. Robinson Jr., (808) 656-1765, facsimile (same).

Sincerely,



Joseph J. Dworaczek  
Lieutenant Colonel, U. S. Army  
Executive Agent for the Joint Trunking System

Enclosures



**DEPARTMENT OF BUSINESS,  
ECONOMIC DEVELOPMENT & TOURISM**

STRATEGIC INDUSTRIES DIVISION  
235 South Beretania Street, Lelopepa A Kamehameha Bldg., 5<sup>th</sup> Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-3807  
Fax: (808) 588-2536  
Web site: www.hawaii.gov/dbedt

LINDA LINGLE  
GOVERNOR  
THEODORE E. LIU  
DIRECTOR  
MARK K. ANDERSON  
DEPUTY DIRECTOR

July 25, 2008

RECEIVED  
JUL 29 2008

EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attn: Kevin Butterbaugh

Re: Draft Supplemental Environmental Impact Statement (SEIS)  
Revisions to the Kakaako Mauka Area Plan and Rules, Oahu, Hawaii

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) Revisions to the Kakaako Mauka Area Plan and Rules. We support the Plan's goal of creating a pedestrian-friendly, high-quality, urban community.

We note that your July 2, 2008, letter to Maurice Kaya states that sustainability guidelines will be incorporated into the Mauka Area Rules and Design Guidelines where feasible. We also note that page 4-08 of the SEIS lists a few energy efficiency measures and refers to LEED.

Our websites (<http://www.hawaii.gov/dbedt/info/energy/efficiency/> and <http://www.hawaii.gov/dbedt/info/energy/renewable/>) provide detailed information on guidelines, directives and statutes, as well as studies and reports on aspects of energy efficiency and renewable energy. Please also do not hesitate to contact Carilyn Shon, Energy Efficiency Branch Manager, at telephone number 587-3810, for additional information on sustainable development, energy efficiency, and renewable energy resources.

Sincerely,

*Elizabeth Corbin*

Elizabeth Corbin  
Acting Administrator

c: OEQC  
Susan Tamura, HCDA



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Theodore Peck, Administrator  
Strategic Industries Division  
Department of Business, Economic  
Development & Tourism  
State of Hawaii  
P. O. Box 2359  
Honolulu Hawaii 96804

Dear Mr. Peck:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated July 25, 2008 supporting the Draft Mauka Area Plan's goal of creating a pedestrian-friendly, high-quality, urban community. Your websites will be used as a resource to develop sustainability guidelines in the Mauka Area Rules and design guidelines.

We appreciate your interest and participation in the environmental review process.

Sincerely,

*Anthony J. H. Ching*  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

LINDA LINGLE  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

August 6, 2008

TO: Mr. Anthony J.H. Ching, Executive Director  
Hawaii Community Development Authority

ATTN: Ms. Susan Tamura

FROM: Patricia Hamamoto, Superintendent  
Department of Education

SUBJECT: Draft Supplemental Environmental Impact Statement Revisions to the  
Kakaako Community Development District Mauka ("Mauka Area Plan"),  
Honolulu, Oahu

The Department of Education (DOE) has reviewed the Draft Supplemental Environmental Impact Statement (SEIS) for the Kakaako Mauka Area Plan. The DOE's primary concerns are whether there will be sufficient school facility space for future students living in Kakaako and whether there will be sufficient public recreation and open space in Kakaako so residents have other options besides using our existing school campuses.

The DOE is in the process of implementing a school impact fee program that will require land and cash from developers of residential housing in impact fee districts. Based on the large number of new residential units projected for the Plan area, it is likely Kakaako will become an impact fee district. While DOE has no specific sites identified for future schools other than the former Pohukaina school site, it is likely that additional land for schools will be required.

Based on Figure 3-13 Housing Projections – Net Change, on page 3-67, there are four "TAZ Zones" where developers would be required to provide approximately three to six acres of school land.

The DOE cannot make projections about future student populations in Kakaako without more information on projected residential unit counts. The SEIS is very limited in its discussion about future population and residential unit counts. It seems insufficient to use eight-year old census figures as a baseline and to make one projection 22 years into the future. There could have been some discussion of the present population of the residential high rise buildings as a basis for

PATRICIA HAMAMOTO  
SUPERINTENDENT



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RECEIVED  
AUG 07 2008

Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Patricia Hamamoto, Superintendent  
Department of Education  
State of Hawaii  
P. O. Box 2360  
Honolulu Hawaii 96804

Dear Ms. Hamamoto:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 6, 2008 regarding the subject Draft SEIS. We offer the following responses in the respective order of your comments.

Hawaii Community Development Authority ("HCDA") shares your concern for providing sufficient school facility and open space for future school age population projected in Kakaako. HCDA acknowledges your comment that future developers may be required to pay a school impact fee.

The population and housing unit projection figures used throughout the Draft SEIS are derived from the City and County of Honolulu, Department of Planning and Permitting ("DPP"). These projections are used to forecast growth on the island of Oahu. These figures, in turn, were compiled by the State Department of Business, Economic Development and Tourism ("DBEDT") Statistics and Data Support Branch, which relied on the United States Census 2000. According to DBEDT Statistics and Data Support Branch, the only known reliable population counts are the United States Census 2000. According to the United States Census 2000, there are 4,253 housing units and a population of 6,180 in the Mauka Area. Since the 2000 census, an additional 1,087 units have been constructed for a total of 5,340 residential units.

HCDA proposes to engage McKinley High School on creating a shared use of the athletic facilities by the public during off-school hours. Based on current off-hour use of McKinley High School facilities, we anticipate athletic facilities to be available after school hours, depending on school activities or sports which will

Mr. Anthony J.H. Ching  
Page 2  
August 6, 2008

gauging future growth timing and distribution, or population projections could be made for every five years, based on the City and County of Honolulu's five-year projections. Listing all of McKinley High School's athletic facilities could give the impression that there are many facilities potentially available for off-hour public use. A greater effort should have been made in the SEIS to estimate how many hours in a week such facilities would be available to the public. The school has a priority of keeping students safe on campus and operating facilities for student use. A one-time grant of capital improvement money to expand sports facilities will not cover the school's ongoing costs of maintenance, energy and security.

The DOE appreciates that the Draft Mauka Area Plan took into consideration the Ewa view plane at Mother Waldron playground and the ewa and makai view planes at McKinley High School. We are concerned that minimum four-story street front height requirements of buildings on the other three sides of Waldron Park could create a handball court effect, rather than duplicate the great "wall effect seen in the Auahi neighborhood." The DOE repeats its concern that minimum four-story height and other street front requirements may not meet the design needs of a pre-school and elementary school.

Thank you for the opportunity to comment on the SEIS. If you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

PH:jmb

cc: Randolph Moore, Assistant Superintendent, OSFSS  
Duane Kashiwai, Public Works Administrator, FDB  
Clayton Kaninau, CAS, Kaimuki/McKinley/Roosevelt Complex Areas  
✓Kevin Butterbaugh, EDAW, Inc.

Ms. Patricia Hamamoto, Superintendent  
Page Two  
May 6, 2009

be a priority. This information has been included in the Final SEIS under Section 3.10.2 of the Final SEIS.

Recognizing that a one-time grant of capital improvement money to expand the athletic facilities may not be sufficient, efforts to finance the maintenance, energy use, and security of the facilities will be explored.

An architectural model was developed to draw a comparison between buildings constructed to the maximum allowable standards under the existing plan and the Draft Mauka Area Plan. Photos, identified as 3-28 through 3-33 in Section 3.10.2 of the Final SEIS, demonstrates that an effect such as "handball court" you mentioned around potential pre-school/elementary school is less obstructive under the Draft Mauka Area Plan than the current plan.

Your concern that the minimum four-story height street front element may not meet the design needs of a pre-school and elementary school is noted. The existing Mauka Area Rules includes a provision that waives the strict application of the development or design standards for public uses and utility installations. Section 15-22-21 of the *Mauka Area Rules, Zoning Adjustments and Waivers* states that the granting of the waiver shall not adversely affect the health or safety of persons, and shall not be materially detrimental to the public welfare or injurious to nearby property improvements. It is likely that this provision will also be included in the revised Mauka Area Rules. In addition, since the land area of the Pohukaina School site may not be adequate for a typical DOE elementary school, it is anticipated that any school built on this property will have to be designed as a 'vertical' school.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

August 11, 2008

RECEIVED  
AUG 12 2008

LAURA H. THELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT



HAWAII COMMUNITY  
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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Morris M. Atta, Administrator  
Land Division  
Department of Land and Natural Resources  
State of Hawaii  
P. O. Box 621  
Honolulu, Hawaii 96809

Dear Mr. Atta:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 11, 2008 regarding the subject Draft SEIS. We offer the following responses in the respective order of your comments.

We acknowledge that according to the Flood Insurance Rate Map, the project site is located in Zones X, A and AE. Section 3.4.2, Natural Hazards, of the Final SEIS, states that developments located in Zone A and AE will be required to comply with the rules and regulations of the City and County of Honolulu and National Flood Insurance Program as it pertains to flood regulations. We acknowledge that projects on State lands will be required to pay charges for resource development, water facilities for transmission and daily storage. Water demands and calculations for State projects will be submitted to the Engineering Division, so it can be included in the State Water Projects Plan Update.

We appreciate your interest and participation in the environmental review process.

Sincerely,

*Anthony J. H. Ching*  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

EDAW Inc.  
841 Bishop Street Suite 1910  
Honolulu, Hawaii 96813

Attention: Mr. Kevin Butterbaugh

Gentlemen:

Subject: Draft Supplemental Environmental Impact Statement Revisions to the  
Kakaako Mauka Area Plan and Rules

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Division of State Parks, Engineering Division, Division of Aquatic Resources, Land Division, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,

*Morris M. Atta*  
Morris M. Atta  
Administrator

Cc: HCDA

51931

LINDA LINGLE  
GOVERNOR OF HAWAII



LAURA H. THIELSEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

July 14, 2008

MEMORANDUM

TO: **DLNR Agencies:**  
 Div. of Aquatic Resources  
 Div. of Boating & Ocean Recreation  
 Engineering Division  
 Div. of Forestry & Wildlife  
 Div. of State Parks  
 Commission on Water Resource Management  
 Office of Conservation & Coastal Lands  
 Land Division - Oahu District

RECEIVED  
STATE PARKS  
08 JUL 15 11:24  
DEPT OF LAND &  
NATURAL RESOURCES

FROM: Morris M. Atta, Administrator *M. Atta*  
SUBJECT: Draft Supplemental Environmental Impact Statement (SEIS) - Revisions to the Kakaako Mauka Area Plan and Rules  
LOCATION: Honolulu, Island of Oahu  
APPLICANT: Hawaii Community Development Authority

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by August 15, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Darlene Nakamura at 587-0417. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*  
Date: *8/1/08*

cc: Central Files

RECEIVED  
LAND DIVISION  
2008 AUG -4 A 10:09  
DEPT OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES  
ENGINEERING DIVISION

LD/MorrisAtta  
Ref.: Draft SEISKakaakoMaukaAreaPlan  
Oahu.633

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones X and A and AE. The National Flood Insurance Program does not have any regulations for developments within Zone X, however, it does regulate developments within Zones A and AE as indicated in bold letters below.
- ( ) Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is also located in Zone \_\_\_\_\_.
- ( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is \_\_\_\_\_.
- (X) Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

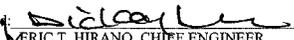
Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:  
City and County of Honolulu, Department of Planning and Permitting

- (X) Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
- ( ) Mr. Kelly Gomes at (808) 961-8327 (Hilo) or Mr. Kiran Emler at (808) 327-3530 (Kona) of the County of Hawaii, Department of Public Works.
- ( ) Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
- ( ) Mr. Mario Antonio at (808) 241-6620 of the County of Kauai, Department of Public Works.
- (X) The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- (X) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

( ) Additional Comments: \_\_\_\_\_  
\_\_\_\_\_

( ) Other: \_\_\_\_\_  
\_\_\_\_\_

Should you have any questions, please call Ms. Suzie S. Agraan of the Planning Branch at 587-0258.

Signed:   
VERIC T. HIRANO, CHIEF ENGINEER  
Date: 8-1-08



STATE OF HAWAII  
 DEPARTMENT OF LAND AND NATURAL RESOURCES  
 STATE HISTORIC PRESERVATION DIVISION  
 601 KAMOKILA BOULEVARD, ROOM 555  
 KAPOLEI, HAWAII 96707

LAURA B. THIELER  
 GOVERNOR  
 DEPARTMENT OF LAND AND NATURAL RESOURCES  
 COMMISSIONER OF PUBLIC RESOURCE MANAGEMENT

RUSSELL Y. TSUI  
 DEPUTY GOVERNOR

REN C. KAWABARA  
 DEPUTY DIRECTOR

AGRICULTURE, FORESTRY, FISH AND OCEAN RECREATION  
 RECREATION AND OCEAN RECREATION  
 COMMISSIONER OF PUBLIC RESOURCE MANAGEMENT  
 CONSERVATION AND RESTORATION  
 CONSERVATION AND RESTORATION DIVISION  
 DIRECTOR

HISTORY AND WILDLIFE  
 HISTORIC PRESERVATION  
 KAKA'AKO MAUKA DISTRICT CONSERVATION  
 LIAISON  
 STATE PARKS



HAWAII COMMUNITY  
 DEVELOPMENT AUTHORITY



KAKA'AKO  
 KALAELOA

Linda Lingle  
 Governor

Jonathan W. Y. Lai  
 Chairperson

Anthony J. H. Ching  
 Executive Director

677 Ala Moana Boulevard  
 Suite 1001  
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E-Mail  
 contact@hcdaweb.org

Web site  
 www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

August 22, 2008

Mr. Kevin Butterbaugh  
 EDAW Inc.  
 841 Bishop Street, Suite 1910  
 Honolulu, Hawai'i 96813

And

Ms. Susan Tamura  
 Hawai'i Community Development Authority  
 677 Ala Moana Boulevard, Suite 1001  
 Honolulu, Hawai'i 96813

LOG NO: 2008.2880  
 DOC NO: 0808LM09  
 Archaeology

Dear Mr. Butterbaugh and Ms. Tamura:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
 Draft Supplemental Environmental Impact Statement (SEIS) Revisions to the  
 Kaka'ako Mauka Master Plan and Rules  
 Various Ahupua'a, Kona (Honolulu) District, Island of O'ahu  
 TMR: (1) 2-1-29, 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55 and 56; 2-3-01, 02,  
 03, 04, 05, 06, 07, 08, 09, 10 and 11**

Thank you for the opportunity to comment on the aforementioned Draft Supplemental Environmental Impact Statement (SEIS), which we received on July 11, 2008.

In general we find the plan addresses the potential for identifying the presence of sub-surface archaeological and cultural sites, including 'iwi kupuna (ancestral remains) as well as historic (post-contact) burial areas. However the language implies that HCDA will encourage potential developers in the Kaka'ako Mauka area to consult with the State Historic Preservation Division (SHPD) before preparing any development plans to familiarize themselves with the archaeological and cultural issues related to the Mauka area (emphasis added). We believe that this language should be strengthened to avoid any misinterpretations of the historic preservation review process. Applicants should be required by HCDA to submit pending development/redevelopment plans to SHPD prior to the final stages of project design and planning. Applicants should be encouraged to initiate historic preservation review 'early' in the process and HCDA should ensure that applicants follow through with any recommendations that SHPD may request.

The importance of identifying, documenting and potentially preserving any unknown or at this time unidentified cultural and historic properties that may be encountered and potentially adversely affected during project development is extremely important to the overall community of Hawai'i. Recent development projects in the Kaka'ako area have identified significant sub-surface historic properties which are considered eligible for both the National and State Register of Historic Places. These site(s) include extensive burial areas in areas previously believed to be devoid of such resources. With this new information at hand moving forward with development plans that do not take this into account are

Ms. Nancy McMahon  
 Archaeology and Historic Preservation Manager  
 State Historic Preservation Division  
 Department of Land and Natural Resources  
 601 Kamokila Boulevard, Room 555  
 Kapolei, Hawaii 96707

Dear Ms. McMahon:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
 Kaka'ako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan.

With regard to the potential for identifying the presence of subsurface archaeological and cultural sites, we have implemented a requirement that all developers and applicants consult with the State Historic Preservation Division ("SHPD") prior to submission of any plans for project eligibility. A written letter of concurrence from the SHPD will be required prior to acceptance of an application for project eligibility review. This policy has already been implemented for projects within the Mauka Area. In addition, we propose to formalize the SHPD review process in the Mauka Area Rules. Additional consultation with your division is expected as we go through the administrative rules process.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
 Executive Director

AJHC/DN/ST:ak  
 c: EDAW, Inc.

Mr. Butterbaugh and Ms. Tamura  
Page 2

irresponsible and do not fulfill the State's obligation and responsibility to 'protect' historic properties that are important in the pre-contact and post-contact history of Hawai'i.

Project specific historic preservation mitigation will need to be addressed for each parcel undergoing re-development activities and subject to HCDA, and subsequently SHPD review. As the nature of development may vary from parcel to parcel each parcel should undergo a level of archaeological inventory survey with sufficient subsurface testing prior to any development activities. These archaeological surveys should be designed to satisfy the concerns of the community balanced with the needs of the applicant. Additional archaeological mitigation i.e.; archaeological monitoring and/or data recovery may also be necessary based on the initial findings of the surveys. Additionally preservation and/or burial treatment plans may also be required. All archaeological mitigations procedures should be in place and approved by SHPD prior to the commencement of construction activities. Applicants should be aware of the overall process and may consult with SHPD on the specifics of their particular parcel(s).

Please contact Lauren Morawski (O'ahu Archaeologist) at (808) 692-8015 if you have any questions or concerns regarding this letter.

Aloha,



Nancy McMahon, Archaeology and Historic Preservation Manager  
State Historic Preservation Division

LM

LINDA LINGLE  
GOVERNOR

**RECEIVED**  
AUG 22 2008



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

August 19, 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh and Ms. Tamura:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)  
Revisions to the Kakaako Mauka Area Plan and Rules  
Oahu, Hawaii

Thank you for providing the subject SEIS on the Kakaako Mauka Area Plan project. The Department of Transportation (DOT) submits the following Highways and Harbors Division comments:

1. The Kakaako Mauka Area Plan will generate project impacts and add to the cumulative impacts to State highway and harbor facilities, particularly in the Downtown to Ala Moana area.
2. Highway Impacts:
  - a. If the Hawaii Community Development Authority (HCDA) proposes to reconfigure the Punchbowl Street intersection with Ala Moana Boulevard, the reconfiguration must be addressed in both the SEIS and SEIS Appendix A (Transportation Analysis). Based on the SEIS, the DOT assumes that the HCDA has abandoned previous proposals to reconfigure this intersection.
  - b. Ala Moana Boulevard is part of the National Highway System and primarily serves regional through-traffic. Because of the potential adverse impacts to through-traffic, the DOT will not allow any new traffic signals or new driveways onto

BRENNON T. MORIOKA  
DIRECTOR

Deputy Directors  
MICHAEL D. FORMBY  
FRANCIS PAUL KEENO  
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.2968



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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contact@hcdaweb.org

Web site  
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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Brennon T. Morioka, Director  
Department of Transportation  
State of Hawaii  
869 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Mr. Morioka:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following responses in the respective order of your comments.

1. We acknowledge the implementation of the Draft Mauka Area Plan will generate project impacts and add to the cumulative impacts to State highway and harbor facilities, particularly in the downtown to Ala Moana area. Mitigation measures are proposed in Section 3.7.2 of the Final SEIS.
2. Highway Impacts:
  - a. We have not abandoned mitigation measures to reconfigure Punchbowl Street and Ala Moana Boulevard as proposed in Final Environmental Assessment for the Makai Area Plan Amendment, July 2005.
  - b. Regarding new traffic signals or driveways along Ala Moana Boulevard, the removal of the intersection at Ala Moana Boulevard-Koula Street (southbound) would leave a large gap in side street access between Ward Avenue and Cooke Street, potentially causing those intersections to operate at a worse level. The proposed improvements at Ala Moana Boulevard and Ahui Street are simply "replacing" the circulation and access functions provided

Mr. Kevin Butterbaugh and Ms. Susan Tamura  
Page 2  
August 19, 2008

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Ala Moana Boulevard within the Kakaako area. Nor will the DOT allow HCDA to extend Cummins Street or Ahui Street to the mauka side of Ala Moana Boulevard, as proposed on page 2-13 of the SEIS.

- c. The DOT supports the HCDA proposals to close the Ohe Street and Koula Street intersections with Ala Moana Boulevard. (SEIS, page 273.)
- d. The DOT requests that HCDA reserve sufficient right-of-way (ROW) for a second left-turn lane on Ala Moana Boulevard's eastbound approach to Ward Avenue. The DOT also requests that the HCDA implement an improvement district to finance this project. Traffic generated by the proposed Kakaako developments will more than double peak afternoon left-turns from eastbound Ala Moana Boulevard onto mauka-bound Ward Avenue. Although future traffic clearly justifies two eastbound left-turn lanes, the existing State ROW cannot accommodate both lanes.
- e. It is not feasible to construct a landscaped median within parts of Ala Moana Boulevard with a 100' ROW. Lane markings, curbs, gutters, and sidewalks require ROW not addressed in "Figure 2-7 Draft Mauka Plan Roadway Cross-Sections". The DOT will not allow the HCDA to narrow existing lanes below 11' to make space for a landscaped median, as proposed on page 2-13 of the SEIS.
- f. Ala Moana crosswalks are located at intersections. Placing shade trees within the Ala Moana ROW at signalized crosswalks, as proposed in Chapter 2 of the SEIS, may endanger motorists and pedestrians. Trees planted within the State ROW comply with AASHTO and DOT standards. DOT will not allow landscaping that blocks driver views of traffic signals, driver views of pedestrians, and CCTV views of traffic operations.
- g. The DOT supports private improvement of Ala Boulevard as a landscaped promenade. DOT requests that the HCDA require that all developers construct a 10' or wider sidewalk within a 15' public pedestrian easement along Ala Moana Boulevard. DOT also requests that, as a special condition for significant redevelopment of property, the HCDA require that developers plant shade trees and construct a 10' or wider sidewalk within a 20' or wider public pedestrian easement along Ala Moana Boulevard. Ideally, the required public pedestrian easement should be improved and landscaped to discourage jaywalking and channel pedestrians toward crosswalks.

Mr. Brennon T. Morioka, Director  
Page Two  
May 6, 2009

by Koula Street after the southbound approach at that intersection is closed.

The new intersection of Ala Moana Boulevard and Cummins Street would improve internal access and relieve the traffic load at the adjacent intersections of Ala Moana Boulevard-Ward Avenue and Ala Moana Boulevard-Kamakee Street. Cummins Street would also help segregate local traffic from through-traffic on Ward Avenue, which is a major north-south arterial, likely reducing delays for people traveling between the Makai Area and the H-1 freeway. It should be noted that there is already a crosswalk across Ala Moana Boulevard at the location where Cummins Street would meet Ala Moana Boulevard. The new intersection will upgrade the crosswalk to allow a concurrent vehicular phase for Cummins Street. Nonetheless, any roadway improvements along Ala Moana Boulevard will require coordination and approval by the State Department of Transportation ("DOT").

- c. We acknowledge support by DOT to close the Ohe and Koula Streets intersections with Ala Moana Boulevard.
- d. While a second left-turn lane on Ala Moana Boulevard's east bound approach to Ward Avenue would improve traffic conditions along Ala Moana Boulevard, adding a second lane would worsen crossing conditions for pedestrians. An additional left-turn lane would force pedestrians to cross eight lanes of traffic without a median, plus a channelized right-turn lane. Given the goals of the Draft Mauka Area Plan to create a neighborhood that encourages use of alternative modes of travel such as walking, and to reconnect the Mauka and Makai areas of Kakaako, an additional eastbound left-turn lane would not be recommended.

Mr. Kevin Butterbaugh and Ms. Susan Tamura  
Page 3  
August 19, 2008

STP 8.2968

- h. Incremental dedication of a public pedestrian easement and construction of new wide sidewalks outside the existing 100' wide Ala Moana ROW may eventually make it feasible to relocate Ala Moana curbs, widen existing narrow lanes to 11', and further widen outside lanes for shared use by bicyclists. Several decades from now, it may also become feasible to reconstruct Ala Moana Boulevard with a landscaped median west of Kewalo Basin.
- i. The DOT is willing to maintain sidewalks constructed by developers along Ala Moana Boulevard provided that plans are submitted for DOT review and approval, and provided that ROW for which the DOT becomes responsible is dedicated free and clear of liens and encumbrances. The DOT is willing to prune and maintain shade trees planted by developers along Ala Moana Boulevard provided that landscape plans are submitted for DOT review and approval, and provided that landscape ROW for which the DOT becomes responsible is dedicated free and clear of liens and encumbrances.
- j. SEIS projections of 2030 traffic congestion on Ala Moana Boulevard are unacceptable. DOT requests that the SEIS evaluate and recommend DOT options for future peak hour prohibitions on left-turns at signalized Ala Moana intersections.
- k. Enhanced highway access management is also required to mitigate traffic congestion on Ala Moana Boulevard. The DOT requests that the Mauka Area Plan and/or HCDA rules include the following provisions to strengthen management of vehicular access along Ala Moana Boulevard.

New driveways onto Ala Moana Boulevard are prohibited and existing driveways shall be consolidated or closed wherever feasible. The HCDA shall consult the DOT concerning applications for new developments on property with vehicular access to Ala Moana Boulevard. As a general condition for approval of new developments with vehicular access to Ala Moana Boulevard, the HCDA shall require that all developers reconstruct and/or combine existing driveways to comply with DOT requirements, place signs which prohibit left-turns, and execute a "Grant of Limited Vehicle Access Rights" document which restricts vehicular access to right turns at DOT-approved driveways. Upon DOT request, HCDA shall require that developers, as a condition for HCDA approval of significant redevelopment of property with vehicular access to Ala Moana Boulevard, construct and dedicate a deceleration lane for right-turns into driveways likely to generate significant traffic. Upon DOT request, HCDA shall require that developers, as a condition for HCDA approval for significant redevelopment of property with vehicular access to county roads, close all existing driveways to Ala Moana Boulevard and quitclaim all rights for vehicular access to Ala Moana Boulevard.

Mr. Brennon T. Morioka, Director  
Page Three  
May 6, 2009

- c. The determination by the DOT to disallow the proposal to decrease the existing lane widths along segments of Ala Moana Boulevard to below 11 feet is noted. The Hawaii Community Development Authority ("HCDA") will explore the possibility of obtaining additional right-of-way ("ROW") from adjacent landowners to implement the landscaped median within parts of Ala Moana Boulevard.
- f. Landscaping proposed within the DOT ROW will comply with the American Association of State Highway and Transportation Officials and DOT standards.
- g. We acknowledge DOT's support of private improvement of Ala Moana Boulevard as a landscaped promenade. The request by the DOT for HCDA to require all developers to construct a 10-foot or wider sidewalk within a 15-foot public pedestrian easement along Ala Moana Boulevard is noted.
- h. We acknowledge the possibility of incremental dedication of a public pedestrian easement and construction of new wide sidewalks within private property.
- i. We acknowledge DOT's willingness to maintain sidewalks and shade trees constructed by developers, provided that plans are submitted to DOT for review and approval, and those right-of-ways for which the DOT becomes responsible is dedicated free and clear of liens and encumbrances.
- j. The restriction of left turns on Ala Moana Boulevard during future peak hour traffic was proposed as a mitigation measure in the Final EA for the Makai Area Plan Amendment, July 2005. The proposed mitigation measure is still valid.

Mr. Kevin Butterbaugh and Ms. Susan Tamura  
Page 4  
August 19, 2008

STP 8.2968

1. Chapter 4 of the SEIS should indicate that requests for modification of highway access rights must be submitted for Highways Division, Right-of-Way Branch review and approval and that plans for work within the State highway right-of-way must be submitted to the Highways Division, Traffic Branch for review and approval.
3. Harbor Impacts:
  - a. The TIAR indicates LOS F along Ala Moana Boulevard between South and Piikoi Streets. Harbors Division is concerned because of the close proximity of the Mauka development area and the maritime facilities located at Piers 1 and 2, Honolulu Harbor. See related item b. below.
  - b. Regarding Section 2.6.1: Roadway Network Changes. HCDA proposes to install a planted median along Ala Moana Boulevard between Punchbowl Street and Ward Avenue and reduce the lane width from 12' to 10'. Harbors Division is concerned with the reduced capacity for harbor commercial traffic generated from Piers 1 and 2, Honolulu Harbor. The EIS should address this issue.
  - c. Figure 2-5: Roadway Network illustrates the use of a promenade pathway located along Ala Moana Boulevard and Punchbowl Street. Please clarify the intent and features of this promenade. Additional pedestrian and bicycle traffic would not mix well with the commercial activities generated by the State's commercial harbor.

The DOT appreciates the opportunity to provide comments.

Very truly yours,



BRENNON T. MORIOKA, PH.D., P.E.  
Director of Transportation

Mr. Brennon T. Morioka, Director  
Page Four  
May 6, 2009

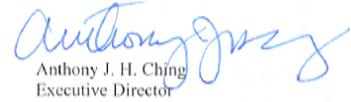
- k. Since no new driveways are proposed along Ala Moana Boulevard, we do not believe that enhanced highway access management is required to mitigate traffic congestion.
- l. Chapter 4 of the Final SEIS will be revised to note that requests for modification of highway access rights must be submitted for review and approval by the DOT-Highways Division, ROW Branch, and that plans for work within the State highway ROW will be submitted to the DOT-Highways Division, Traffic Branch for review and approval.
3. Harbor Impacts:
  - a. With regards to the close proximity between the Mauka and Makai Areas, the Kakaako Makai Area Plan Amendment prepared by Wilson Okamoto in 2005 proposed four lanes of through traffic on Halo Street. Halo Street is currently two lanes, but was designed to accommodate four lanes of traffic. The reconfigured Halo Street could provide an alternative for Makai Area traffic (such as that generated by the existing maritime facilities) and preclude the need for this traffic to use Ala Moana Boulevard between South Street and Ward Avenue.
  - b. Implementation of the Draft Mauka Area Plan will generate project impacts and add to the cumulative impacts to State highway and harbor facilities, particularly in the downtown to Ala Moana area. Section 3.7.2 of the Final SEIS provides the analysis and mitigation measures as a result of the proposed roadway network changes. Technical analysis is also provided in Appendix C, Transportation Analysis of the Final SEIS.

Mr. Brennon T. Morioka, Director  
Page Five  
May 6, 2009

- e. The intent of the promenade to create an outstanding pedestrian environment, that supports a multi-uses, including bicycles, and pedestrians. Ala Moana Boulevard currently supports substantial multi-modal use (bicyclists, joggers, and pedestrians). As such, the Draft Mauka Area Plan aims to create an outstanding environment where different uses as mentioned can be supported.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



## Hawaii State Legislature

STATE CAPITOL  
HONOLULU, HAWAII 96813

August 22, 2008

RECEIVED  
AUG 22 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

RE: Draft Mauka Area Plan Supplemental Environmental Impact Statement (SEIS)

We have reviewed the Draft Mauka Area Plan Draft SEIS, particularly with regard to how it will impact small businesses and industrial uses in central Kaka'ako. We appreciate the opportunity to provide our comments on the Draft SEIS.

First, we support the basic concept of the plan: to develop urban village neighborhoods where people can live, work and play; to create great public places; and to develop connections by providing convenient access to a wide range of services and activities via walking, bicycling, driving, or public transit. These concepts will serve Hawaii residents well as we deal with the challenges of developing sustainable communities.

We do, however, have a number of concerns regarding the Draft Mauka Area Plan (DMAP) Draft Supplemental EIS.

Impacts upon central Kaka'ako small business/industrial uses – Potential Impacts and Mitigation Measures, Section 3.11.2

Based on the most recent U.S. Census data, Kaka'ako mauka businesses employed 16,931 people – 5.9% of Honolulu and 3.9% of statewide non-agricultural workers and generated \$2.02 billion in annual sales in 2006 (Final Report and Quarterly Report No. 4 for Contract entitled "Transit Oriented Community-based Development Project," March 2008).

Of these businesses, many of the small businesses in central Kaka'ako (see Figure 2-2, "Neighborhood Network," from Draft Mauka Area Plan Draft SEIS, Vol. 1, page 2-4) have been in Kaka'ako for 15 years, and are typically characterized as "other" by NAICS and light industrial by land use and zoning policy. These types include repair and maintenance, auto mechanical and electrical repair, auto body repair, and electronic and precision equipment repair and maintenance.

The economic impact of businesses included within this classification is identified as 154 businesses employing 732 staff, with annual sales of \$56.3 million. Although this classification is a small subset of all Kaka'ako Mauka businesses, what is significant is that the "other" classification includes a disproportionately-higher share of the total number of businesses providing repair and maintenance, automotive repair and maintenance, automotive mechanical



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKA'AKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
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Web site  
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Ref. No.: PL EIS 6.26

May 6, 2009

The Honorable Carol Fukunaga  
Senate District 11 (Makiki Tantalus-Ala Moana)  
State Capitol, Room 216  
Honolulu, Hawaii 96813

The Honorable Suzanne Chun Oakland  
Senate District 13 (Kalihi, Liliha, Nu'uano/Pauoa)  
State Capitol, Room 226  
Honolulu, Hawaii 96813

The Honorable Sam Slom  
Senate District 8 (Hawaii Kai, Aina Haina, Kahala)  
State Capitol, Room 222  
Honolulu, Hawaii 96813

The Honorable Tom Brower  
House of Representative District 23 (Waikiki, Ala Moana)  
State Capitol, Room 315  
Honolulu, Hawaii 96813

The Honorable Karl Rhoads  
House of Representative District 28 (Kakaako, Iwilei)  
State Capitol, Room 326  
Honolulu, Hawaii 96813

Dear Senator Fukunaga, Senator Chun Oakland, Senator Slom, Representative Brower, and Representative Rhoads:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following responses in the respective order of your comments.

and electrical repair and maintenance, automotive body, paint, interior and glass repair, other automotive repair and maintenance, and electronic and precision equipment repair and maintenance throughout Honolulu. The likely displacement of these types of industrial services, wholesaling, and related commercial activities does not simply mean that such service businesses would have to move elsewhere – it also means that displacements could affect up to 25%-30% of all auto repair and maintenance businesses serving Honolulu.

The Draft Mauka Area Plan (DMAP) discusses potential improvements to existing commercial and industrial uses, but does not provide recommendations that would assure the long-term viability of small businesses in the area: Section 3.11.2 (page 3-63 of the KMAP Draft SEIS) says, "...Implementation of the Draft Mauka Area Plan would enable existing uses, such as commercial and industrial uses present in the Central Kaka'ako neighborhood, to be improved and enhanced to maintain their viability in the Mauka Area. **It is also likely to facilitate new development on or around these existing uses**" (emphasis added).

Our concern is that most of the redevelopment of Kaka'ako envisioned by the Draft Mauka Area Plan — such as residential, commercial/retail development — will exacerbate the pressures of double-digit property tax increases due to increases in land values, which will, in turn, force existing industrial and commercial businesses out of central Kaka'ako to outlying areas of Honolulu.

HCDA's statutory framework, set forth in Section 206E-31, HRS, states: *"In coordinating community development in the Kaka'ako district, the authority shall plan a mixed-use district whereby industrial, commercial, residential and public uses may coexist compatibly within the same area...The authority shall plan for the above uses, but shall also respect and support the present function of Kaka'ako as a major economic center, providing significant employment in such areas as light industrial, wholesaling, service, and commercial activity"* (emphasis added).

In order to fulfill the foregoing requirements of HCDA's statutory mandate, we believe that HCDA's DMAP Draft SEIS must provide much greater direction on what the agency will provide in terms of programs to assist small businesses to successfully "take advantage of expanding their existing uses and State-funded infrastructure upgrades" (Section 3-11.2, page 3-64, DMAP Draft SEIS).

Although the DMAP Draft SEIS provides general policy guidelines with regard to relocation and relocation assistance to persons and businesses displaced by government actions (see Relocation Plan, Section 2.10, pages 3-63 and 3-64, DMAP Draft SEIS), it lacks substantive discussion of actions/measures to support establishment of a viable industrial service area. We believe HCDA must address the following questions in its DMAP Draft SEIS:

1. In what specific ways will HCDA fulfill the policy set forth in Section 206E-31, HRS? For example, is HCDA willing to undertake a community redevelopment program whose focus would be to provide redevelopment assistance to businesses seeking to expand or improve their existing uses, and to provide relocation assistance to affected businesses during construction of infrastructure upgrades (e.g., roads, sewer, water infrastructure)? How does HCDA propose to achieve its Urban Design Principles for central Kaka'ako, as specified in Section 2.4.1 (page 2-5, KMAP Draft SEIS): **"Support the small-lot, mixed-use pattern of central Kaka'ako"**?

The Honorable Carol Fukunaga  
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**Impact upon Central Kakaako small business/industrial uses – Potential Impacts and Mitigation Measures, Section 3.11.2.**

Chapter 3.11.2, Landholdings and Land Use, Potential Impacts and Mitigation Measures, of the Final SEIS will include information on the Hawaii Community Development Authority's ("HCDA") proposals to assist small businesses and landowners to successfully "take advantage of expanding their existing uses and State-funded infrastructure upgrades". The overall strategy for Central Kakaako is to support the viability of small business while allowing for potential future re-use of small properties through selective improvements to streets and parking. The intent is to minimize disruption and displacement of existing businesses.

1. *In what specific ways will HCDA fulfill the policy set forth in Section 206E-31, HRS? How does HCDA propose to achieve its Urban Design Principles for central Kakaako as specified in Section 2.4.1 (page 2-5)?* The Mauka Area Plan and Rules serve as the basis for guiding both public and private development in Kakaako as well as the means to fulfill the policies set for in Chapter 206E, Hawaii Revised Statutes. HCDA proposes to achieve its Urban Design principles for Central Kakaako by increasing density and height provisions for future developments, implement improvements to streets and infrastructure with the support of majority of property owners of the affected areas, and developing a parking program in conjunction with Improvement Districts for Central Kakaako.
2. *Was any attempt made in the Draft Mauka Area Plan to include additional scenarios and evaluations in which particular methods of helping preserve small businesses might be in the form of an "industrial condo or cooperative" for light industrial small businesses that wish to remain in Kakaako?*

2. Was any attempt made in the KMAP Draft SEIS to include additional scenario(s) and evaluations in which particular methods of helping preserve small businesses might be in the form of an "industrial condo or cooperative" for light industrial small businesses that wish to remain in central Kaka'ako?
3. What steps will HCDA take in order to address the multi-jurisdiction regulatory framework that exists in central Kaka'ako, which generally hits small businesses hardest – for example, with rapidly-escalating City & County property taxes for commercial/industrial uses or roadway dedication requirements on one hand, and State assessments for infrastructure improvement districts on the other?

Roadway Network Changes, Section 2.6.1

Given the multitude of development pressures facing central Kaka'ako industrial and commercial businesses, we support the DMAP Draft SEIS recommendations for modifications to the roadway network (see Figure 2-5, DMAP SEIS, page 2-12), for they provide a significant improvement over current traffic conditions.

The distinctions between avenues, streets, service streets and alleys proposed in the DMAP Draft SEIS — along with proposed extensions of Cummins Street from Queen Street to intersect with Auahi Street and Ala Moana Boulevard, and extension of Halekauwila Street to Kamakee Street — will provide more rapid mauka-makai and ewa-diamond head traffic circulation through central Kaka'ako, while allowing a wider range of alternate route choices through the whole area. Designation of Queen Street as a "walkable, low speed (25 mph) thoroughfare in urban areas primarily serving abutting property" will help facilitate community buy-in for much-needed infrastructure improvements.

Additionally, we support the DMAP Draft SEIS recommendation to reinstitute two-way traffic on Pensacola Street north of Kapiolani Boulevard (two southbound lanes and one northbound lane with a planted median); and two-way traffic on Piikoi Street north of Kapiolani Boulevard (two northbound lanes and one southbound lane, with planted median and bicycle lane). This change will slow down the frequency of speeding that occurs on Pensacola Street, and provide a more pedestrian-friendly crossing environment for Sheridan/Ala Moana residents.

Although the Sheridan neighborhood is characterized as a "predominantly residential neighborhood composed of small, fee simple lots", existing traffic conditions on abutting Pensacola, King, Piikoi Streets and Kapiolani Boulevard make it virtually impossible for pedestrians, especially elderly residents, to safely traverse these streets during rush-hour traffic.

The Sheridan neighborhood's close proximity to the Wal-Mart/Sam's Club development also means that narrow, residential streets are frequently clogged with delivery vehicles and container trucks entering the Sheridan Street delivery entrance. For example, last weekend, an elderly resident in the Sheridan Street area was critically injured by a tractor-trailer early on a Saturday morning in spite of being in a marked crosswalk.

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Under the existing Mauka Area Rules, industrial condo and cooperatives are permitted. We anticipate that the new Mauka Area Rules will also allow industrial condos and cooperatives. Through the Mauka Area Plan public input process, Central Kaka'ako businesses expressed the need for as much flexibility as possible with respect to land use (mixed use) and additional density and height for future developments. These provisions have been incorporated into the Draft Mauka Area Plan.

3. *What steps will HCDA take in order to address the multi-jurisdictional regulatory framework that exists in central Kaka'ako, which generally hits small businesses hardest – e.g., City and County property taxes, roadway dedication and State assessments?* At this time, we do not propose any changes to the multi-jurisdictional regulatory framework. HCDA does not have jurisdiction or control over real property taxes in the City and County of Honolulu. We will continue to coordinate with the City on roadway dedication and acceptance of infrastructure improvements.

**Roadway Network Changes, Section 2.6.1.** We acknowledge your support of the Draft Mauka Area Plan's proposed roadway classification and the proposed two-way traffic on Pensacola Street and Piikoi Street. We would like to note that the Draft SEIS Transportation Analysis has determined that traffic conditions for a two-way Pensacola and Piikoi Streets appear to be unacceptable with Levels of Service "F" during peak hour traffic. A discussion on the impacts and proposed mitigation on the proposed two-way Pensacola and Piikoi Streets is provided in Section 3.7.2, Traffic, Mitigation Measures, of the Final SEIS.

Parks and Open Space: Strategies for Meeting the Project Need, Section 2.5.1 and Potential Impacts and Mitigation Measures, Section 3.10.2

The DMAP Draft SEIS identifies the grossly-inadequate level of public park spaces within Kaka'ako mauka, e.g., with only nine acres of existing park space (five acres are public) in conjunction with the City & County of Honolulu's parks planning standard of two acres of park space for every 1,000 residents of an area. Meeting City & County standards would mean that 60 acres of park spaces are needed for the Kaka'ako mauka area, which means that the projected park spaces for Kaka'ako mauka are deficient by over 50 acres.

However, the DMAP Draft SEIS offers very limited options for addressing the deficiencies in park/recreational spaces, while holding open the possibility of an additional 30,000 residents by the year 2030. Abutting neighborhoods like Ala Moana/Sheridan and McCully suffer equal - if not greater - deficiencies in parks/recreational spaces. As such, we are concerned that the boundaries of the Kaka'ako mauka footprint will re-position recreational development alternatives to serve future Kaka'ako mauka development without addressing immediate parks/recreational facility needs in urban Honolulu today.

We believe that the following types of parks/recreational facilities strategies are insufficient to increase the level of recreational spaces to a meaningful level in Kaka'ako mauka and adjoining Cultural District and Civic Center areas: (a) shared use of recreational facilities, such as McKinley High School, (b) encourage private investment in open space and recreational facilities such as urban plazas and pocket parks, and (c) continue to require developers to provide on-site recreational amenities for projects.

To address the need for additional park spaces/recreational amenities to support the increased population proposed in the DMAP Draft SEIS, HCDA should pursue more comprehensive public/private strategies to address the following questions:

1. Who are the intended beneficiaries of shared use of existing public recreation facilities? And how is increased usage by community/school users being factored into the DMAP Draft SEIS transportation analyses? For example, in pursuing a formal joint school/community use arrangement for shared use of public recreation facilities at McKinley High School's campus, will HCDA address the broader range of issues that joint school/community use will entail - e.g., such as the need for additional parking facilities, long-term operating and maintenance needs for the enhanced facilities, and mitigating additional traffic, noise or other impacts that accompany increased school/community usage?
2. Were any attempts made in the DMAP Draft SEIS to leverage private investments in parks and recreational facilities by including scenario(s) to expand upon existing park spaces like Thomas Square, Sheridan Park and Department of Agriculture's Heritage Park adjoining Pawa'a Community Park, to examine the opportunities for development of public lands for enhanced recreational use in Kaka'ako makai (based on CPAC recommendations), or to build upon the cultural/recreational benefits of areas immediately mauka of the KMAP area like Neal Blaisdell Center, the Cultural District and Civic Center?

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**Parks and Open Space: Strategies for Meeting the Project Need, Section 2.5.1 and Potential Impacts Mitigation Measures, 3.10.2.** We acknowledge your comment that the Draft Mauka Area Plan's strategies may be insufficient to increase the level of recreational spaces to a meaningful level in Kakaako Mauka and adjoining Cultural District and Civic Center areas. The Draft Mauka Area Plan proposes the following:

- Use of vacant public land. The former Pohukaina School is programmed for a possible future school site. If a school is built at this site, it should provide some additional outdoor recreation facilities for children on the school grounds itself. If a public school is not built on this site, it could be used for the expansion of Mother Waldron Neighborhood Park.
- Shared use of public recreation facilities, including McKinley High School.
- Enhance pedestrian connections to nearby public parks and campuses. As a centrally located urban district, the Mauka Area offers a wide array of places within walking or bicycling distance to shoreline parks, public squares and campuses.
- Private investment in open space and recreational facilities. The redevelopment of private properties presents opportunities to increase the availability of public open space and recreational facilities for use by neighborhood residents.

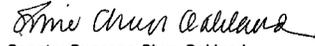
Thank you for the opportunity to provide these comments.

Sincerely,

  
Senator Carol Fukunaga  
District 11 (Maiki/Tantalus-Ala Moana)

  
Senator Sam Slom  
District 8 (Hawaii Kai, Aina Haina, Kahala)

  
Representative Tom Brower  
District 23 (Waikiki, Ala Moana)

  
Senator Suzanne Chun Oakland  
District 13 (Kalihi, Liliha, Nu'uuanu/Pauoa)

  
Representative Karl Rhoads  
District 28 (Kaka'ako, Iwilei)

The Honorable Carol Fukunaga  
The Honorable Suzanne Chun Oakland  
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We would also like to note that, under the existing Mauka Area Plan and Rules, all private residential projects with development site of 20,000 square feet or more are required to provide 55 square feet of recreation space per dwelling unit. As a result of this requirement, 17 acres of private recreational space has been developed in the Mauka Area. In addition, pursuant to Chapter 206E-12, HRS, Dedication for Public Facilities as a Condition to Development, approximately \$3.38 million has been expended or approved to be expended from public facilities dedication fees for parks within the Mauka Area. In addition, the HCDA has acquired approximately 98,000 square feet of land through public facilities dedication for the expansion of the Mother Waldron Neighborhood Playground and Makai Gateway Park.

Chapter 3.10.2 of the Final SEIS includes a discussion on intended beneficiaries of shared use of existing public recreation facilities and associated impacts. In our discussions with McKinley High School Administration and Athletic Department, McKinley High School facilities are already being used as a community facility during non-school hours. School facilities being used by the community include the cafeteria, classrooms, auditorium, gymnasium and library.

To date, there were no attempts through the Draft SEIS process to leverage private investments in parks and recreational facilities by including scenario(s) to expand upon existing park spaces (Thomas Square, Sheridan Park and the Department of Agriculture's Heritage Park adjoining Pawaa Community Park) to examine the opportunities for development of public lands for enhanced recreational use in Kakaako Makai or to build upon the cultural/recreational benefits of areas immediately Mauka of the Mauka Area.

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The Honorable Suzanne Chun Oakland  
The Honorable Sam Slom  
The Honorable Tom Brower  
The Honorable Karl Rhoads  
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We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

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FAX (808) 594-1885



STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

HRD08/3459C

August 19, 2008

Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

**RE: Supplemental Environmental Impact Statement (SEIS), Revisions to the Kaka'ako Community Development District, Mauka Area Plan and Rules, Kaka'ako, O'ahu.**

Aloha e Kevin Butterbaugh,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated May 23, 2008. OHA has reviewed the project and offers the following comments.

OHA notes that the 1985 SEIS assessed the Makai Area Plan that also included an assessment of infrastructures in the Mauka area. (SEIS, page 1-1) Therefore, OHA asks how else this Mauka Area Plan may relate to or affect the Makai area.

OHA wrote a comment letter for these plans on January 15, 2008 stating the following:

The Hawaii Community Development Authority (HCDA) intends to be guided by three key principles:

- (1) develop urban village neighborhoods where people can live, work, shop and play;
- (2) create great public places; and
- (3) make connections by providing convenient access to a wide range of services and activities via walking, bicycling, driving or transit.

HAWAII COMMUNITY  
DEVELOPMENT AUTHORITYLinda Lingle  
GovernorJonathan W. Y. Lai  
ChairpersonAnthony J. H. Ching  
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Ref. No.: PL EIS 6.26

May 6, 2009

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

Dear Mr. Nāmu'o:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following responses in the respective order of your comments.

*Relationship to the Makai Area.* The Draft Mauka Area Plan cites the importance of the Mauka-Makai connection. A key component of the Draft Mauka Area Plan is to enhance connections to the Makai Area and promote the reintegration of the City and the waterfront. The Mauka and Makai Areas are also intrinsically connected as the two sub-districts that comprise the Kakaako Community Development District ("KCDD"). The overall vision for Kakaako is to establish the District as the most desirable and sustainable urban place in Hawaii in which people can work, live, visit, learn and play.

*Implementation of the Mauka Area Plan.* The Mauka Area Plan and associated Rules serve as the basis for guiding public improvements and private development activities in the KCDD Mauka Area. Since the adoption of the KCDD Plan in 1982, HCDA has performed regulatory functions to ensure that any development occurring in the District meets the provisions of the Mauka Area Plan. The Mauka Area Plan includes specific requirements and restrictions relating to building height, density, building setbacks, front yards, open space, view corridors, streetscapes, landscaping and urban design parameters. The Mauka Area Plan also contains

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Of course OHA is in support of these wonderful ideas and goals for Kaka'ako. However, we are not sure how they will come to fruition, and the SEIS is unclear as to specific implementation. OHA asks that the EIS bring clarity to this issue.

For example, the third guiding principle specifically mentions bicycling, yet section 2-7 *Bicycle Facilities* is only two sentences long (and one of them is conditional). If bicycling truly is part of the three 'guiding principles' then OHA wonders why there is only one new bicycle corridor being considered. OHA would expect to see plans for dedicated bicycle lanes along major transit routes into and through Kaka'ako to implement and achieve this goal. This would also match with section 2.4 *Transportation*.

OHA is disappointed that our previously stated concerns have not been adequately addressed. For example, page 90 of Appendix 1, section 4.3.3 states that bicycle lanes are planned for major streets such as Ala Moana Boulevard but then one sentence later states that a bicycle lane is "impracticable" and not safe for bicyclists.

Also, our January 15, 2008 letter cited concerns regarding plan implementation; however, Section 2.13 of the SEIS states that implementation will proceed in increments subject to responses generated from economic cycles and availability of public funding. OHA asks if there are conditions or requirements that would mandate these plans into action or are they strictly to be used as a guide subject to funding as stated in the SEIS. Otherwise, the critical issue of implementation is subjective and left unclear in the SEIS.

Additionally, our January 15, 2008 letter specifically stated that we were "eager to read" the cultural impact assessment promised in section 3.2.2 *Cultural Practices and Traditions* of the SEIS preparation notice. OHA notes that section 2.8 *Historic and Cultural Resource Plan* of the current SEIS is less than a page long. Furthermore, OHA notes that community consultation for the cultural impact statement is pending.

Page 65 of the cultural impact assessment states, "Our background historic research indicates a low intensity of habitation use in the majority of the present project area in pre-contact and early post contact times." OHA does not agree with this assessment. The historic accounts of this area in the cultural assessment itself and the numerous burials discovered in this area validate OHA's position.

We do note that a July 31, 2008 invitation to comment on a cultural assessment for the Mauka Area Plan was sent to us after the invitation to comment on the Mauka Area Plan itself was sent to us on July 8, 2008. As the applicant surely knows, a cultural impact assessment is required by Act 50, Session Laws of Hawaii, 2000.

OHA also asks about plans involving the proposed rail system in the Mauka area. Any federal funding would trigger a Section 106 National Historic Preservation Act consultation. Under the Section 106 process and its implementing regulations (36 CFR § 800), an evaluation

Mr. Clyde W. Nāmu'o, Administrator  
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schemes for transportation, open space and recreation areas, public facilities and infrastructure. Implementation of the Mauka Area Plan is contingent upon economic cycles and the availability of funding. Section 2.13 of the Final SEIS includes a discussion on the implementation of the Draft Mauka Area Plan.

*Bicycle Facilities.* Section 3.7.2, Transportation, Bicycle Impacts, of the Final SEIS is revised to address OHA's concern regarding the lack of bicycle facilities in the Draft Mauka Area Plan. The Draft Mauka Area Plan supports the 2003 State Bike Plan and the City and County of Honolulu Department of Transportation Services ("DTS") Honolulu Bicycle Master Plan. The 2003 State Bike Plan proposes bike lanes to be created along Ala Moana Boulevard. The existing Ala Moana Boulevard consists of an 84-foot curb-to-curb width with seven vehicle lanes ranging from 9-to-12 feet in width. A dedicated bike lane would require an additional 5 feet on each side of the street. Options we are considering in consultation with the City DTS and State DOT include:

- Provide a multi-use path to accommodate a wide variety of non-motorized transportation. Development of a multi-use path would require acquiring additional private land or create a public use easement. The State DOT is amenable to maintaining the private easement if plans are reviewed and approved by the DOT.
- Create wider curb lanes to create a bicycle route for most major streets in the Mauka Area, including Ala Moana Boulevard, Kapiolani Boulevard, King Street, Beretania Street, Ward Avenue, and Pensacola Street. Creating a wider curb lane on streets with limited right-of-way width will require the acquisition of additional private property or a use easement.

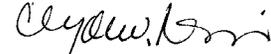
*Cultural Impact Assessment.* The Cultural Impact Assessment ("CIA") is included in the Final SEIS as Appendix D. The CIA was prepared by Cultural Surveys Hawaii ("CSH")

Kevin Butterbaugh  
August 19, 2008  
Page 3

of the effects of a proposed project is considered first. If a determination of adverse effect is made, the effects are mitigated, usually through measures described in a memorandum of agreement.

Thank you for the opportunity to comment. If you have further questions, please contact Grant Arnold at (808) 594-0263 or e-mail him at [granta@oha.org](mailto:granta@oha.org).

'O wau iho nō me ka 'oia'i'i'o,



Clyde W. Nāmu'o  
Administrator

Mr. Clyde W. Nāmu'o, Administrator  
Page Three  
May 6, 2009

pursuant to Chapter 343, Hawaii Revised Statutes. Hawaiian organizations, agencies, cultural and lineal descendants and community member were contacted to identify knowledgeable individuals with cultural expertise and/or knowledge of the Mauka Area and vicinity.

According to CSH, the statement, "Our background historic research indicates a low intensity of habitation use in the majority of the present project area in pre-contact and early post contact times" was made at the conclusion of a literature review. A series of community consultations were conducted thereafter, and CSH amended the statement to read: "... the study area was apparently outside the two most intensely populated and cultivated areas— Waikiki and Honolulu (or Kou)—along this portion of Oahu's southern shore during pre-Contact times. It was nonetheless well utilized by Hawaiians for activities appropriate to the specific environment, salt making and farming of fishponds, along with some wetland agriculture." The revised statement can be found in the CIA included in the Final SEIS as Appendix D.

The Honolulu Rail Transit ("HTR") project is being proposed by the U.S. Department of Transportation Federal Transit Administration and the City and County of Honolulu Department of Transportation Services Rapid Transit Division. Information on the HTR project is available on-line at <http://www.honolulutransit.org>.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

12503-16



**UNIVERSITY  
of HAWAII**  
SYSTEM

Sam Callejo  
Vice President for Administration

August 19, 2008

Mr. Anthony J.H. Ching  
Executive Director  
Hawai'i Community Development Authority  
677 Ala Moana Blvd, Suite 1001  
Honolulu, HI 96813

Dear Mr. Ching:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)  
Revisions to the Kakaako Mauka Area Plan and Rules  
Tax Map Keys: 2-1-29, 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54,  
55, and 56; 2-3-01, 02, 03, 04, 05, 06, 07, 08, 09, 10, and 11  
Honolulu, O'ahu, Hawai'i

The University of Hawai'i has reviewed the above-referenced Draft SEIS and has no comments or recommendations.

Thank you for the opportunity to review and comment on the Draft SEIS.

Sincerely,

  
Sam Callejo  
Vice President for Administration  
University of Hawai'i System

Post-it® Fax Note	7671	Date	8/19/08	# of pages	1
To	Anthony Ching	From	Sam Callejo		
Co./Dept.	HCDA	Co.	UH-System		
Phone #		Phone #	956-9922		
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**KAKA'AKO  
KALAELOA**

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Ref. No.: PL EIS 6.26

May 6, 2009

David S. McClain, Ph.D.  
President  
The University of Hawai'i System  
2444 Dole Street, Bachman 202  
Honolulu, Hawaii 96822

Dear Dr. McClain:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 19, 2008 stating that you have no comments or recommendations to offer on the subject Draft SEIS.

We appreciate your participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

Water Resources Research Center  
Environmental CenterUNIVERSITY  
of HAWAII  
MĀNOAAugust 22, 2008  
RE: 0782Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, HI 96813

Dear Ms. Tamura:

Draft Supplemental Environmental Impact Statement  
Kakaako Mauka Area Plan  
Honolulu, Oahu, Hawaii

The Hawaii Community Development Authority (HCDA) proposes to revise the existing Kakaako Mauka Plan, originally accepted in 1982. The HCDA has determined that a Supplemental Environmental Impact Statement (SEIS) should be prepared for the proposed changes to the Kakaako Mauka Area Plan. The Kakaako Mauka area encompasses approximately 450 acres of land and is located between downtown Honolulu and the Ala Moana region. The district is bounded by Piikoi, Punchbowl and King Streets, and Ala Moana Boulevard. The Draft Supplemental Environmental Impact Statement (DSEIS) proposes compatible land uses on pedestrian-friendly streets and encourages the utilization of alternative forms of transportation. Architectural improvements are designated for grade-level streets, and a categorization of the existing street circulation system is proposed with the intent of providing for a safe multi-modal transportation network. Under the revised plan, large developments on superblocks will be discouraged, and height restrictions for structures along Ala Moana Boulevard will be implemented. Mauka-Makai views will be preserved by lowering the maximum allowable building footprint size and orienting the short façade of tall structures in the Diamond Head-Ewa direction. Under the revised Kakaako Mauka Plan new residential projects in the Mauka Area on lots of 20,000 square feet or greater will be required to allocate "Reserved Housing" units in order to provide for affordable housing in the district.

This review was conducted with the assistance of Ryan Riddle, Environmental Center.

**General Comments**

In our opinion this plan is better than the previous Kakaako Mauka Plan developed in the 1980's. The previous plan envisioned an area that would be dominated by high rise, residential towers connected by pedestrian walkways while below the streets would be shaded in never ending gloom reminiscent of a scene from Blade Runner. This new plan foresees a Kakaako that

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contact@hcdaweb.orgWeb site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Peter Rappa  
University of Hawaii Environmental Center  
2500 Dole Street, Krauss Annex 19  
Honolulu, Hawaii 96822

Dear Mr. Rappa:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS. We offer the following responses in the respective order of your comments.

General Comments:

We intend to develop a form-based zoning code in conjunction with the Mauka Area Rules amendment process. The form-based code will carry out the urban design plan proposed in the Mauka Area Plan. Amendments to the Mauka Area Rules will be developed in accordance with Chapter 91, Hawaii Revised Statutes.

With regard to financing, we concur that most private projects within the Mauka Area will be privately financed. As stated in Chapter 2.13 of the Final SEIS, implementation of the Mauka Area Plan will proceed in response to economic cycles and the availability of public funding for public projects. In the past, legislation has been introduced to enable HCDA to receive revenues from real property taxes related to the incremental growth of property values of State-owned public lands located within community development districts. Although the bill failed to pass, the HCDA continues to pursue tax increment financing for community development districts.

August 22, 2008  
Page 2

is open, attractive, pedestrian and bicycle friendly, embracing the latest ideas in new urbanism and transit oriented development. We believe that this will be an attractive place to live, work and play if the plan is implemented. We see two areas where the draft supplemental environmental impact statement and mauka area plan could have been improved.

The first area is in zoning. Although there is a land use plan (figure 2-1 and figure 3-11), there is no specific zoning plan to go along with it. We suggest that the HCDA planners develop a form-based zoning overlay for the plan that shows developers what the area should look like when it is developed. Form-based codes are results oriented rather than prescriptive. They allow for more flexibility in specifics in favor of retaining the overall "look" of a place. Without the overlay, developers can propose projects that meet zoning requirements without achieving what the plan envisions.

The second area is finance. There was nothing in the DEIS that examines finance. While we understand that most of the projects will be privately financed, we find it difficult to understand why the HCDA hasn't examined different financial incentives and disincentives for development in this area. Perhaps the DEIS could discuss several innovative financial techniques that can be used as incentives for developing in Kakaako such as tax incremental financing and limited equity partnerships. Implementing this plan may take some creative ways to get capital flowing into the area. Banks for example, may not be accustomed to financing mixed-use development and may be hesitant to invest. HCDA should look for ways to get things started. We believe there should be a discussion on how HCDA envisions the financing of development foreseen by this plan.

In addition to our general comments, we also have several specific comments.

#### **Land Use** (pp. 2-1 – 2-3)

The map on page 2-2 shows a residential section in yellow. The explanation on pages 2-1 and 2-3 does not include a solely residential section only mixed-use residential.

#### **Roadway Network Changes** (pp. 2-11 – 2-13)

Cummins Street, slated for extension to Ala Moana Blvd., is not labeled on the map on page 2-12.

#### **Reserved Housing** (pp. 2-18 – 2-19)

We agree with the trade-off proposed in the second paragraph on page 2-19 to give developers offsets in return for providing Reserved Housing. Giving both density bonuses and expedited permits are standard incentives for developers to build less than market housing. We are curious as to how the expedited permitting process will work. Will the County's Department

Mr. Peter Rappa  
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#### Specific Comments:

- *Land Use.* The legend on Figure 2-1 Proposed Land Use Plan will be revised to reflect the Mixed-use Zone Residential designation.
- *Roadway Network Changes.* Cummins Street will be labeled on the Roadway Network map.
- *Reserved Housing.* Development activities within the Mauka Area are governed by the development provisions established in the Mauka Area Plan and Rules. The Hawaii Community Development Authority ("HCDA") administers its own Development Permit, pertaining to land use and zoning; however, building permits and other related permits is administered by the City and County of Honolulu.
- *Inclusionary Housing.* The Draft Mauka Area Plan, states a preference to have reserved housing units included within development projects. However, Chapter 206E-4(18), Hawaii Revised Statutes, allows the affordable housing requirement to be located outside of the project site as well as on land outside the geographic boundary of the Authority's jurisdiction. Therefore, by law, the HCDA cannot require all reserved housing units to be provided on site.
- *Public Facilities Program.* We acknowledge your comment on accommodating the development of places for people to shop for food in the Mauka Area Plan. Under the existing Mauka Area Rules, grocery stores are permitted and encouraged within the District. We anticipate that the new Mauka Area Rules will also permit and encourage grocery stores.
- *Intersection Operating Conditions.* The transportation analysis associated with the DSEIS assessed the level of service (LOS) at E for certain streets in the Mauka Area. While it is true that

August 22, 2008  
Page 3

of Planning and Permitting be responsible for processing permits for projects proposed in Kakaako Mauka or does the HCDA have its own permitting section?

**Inclusionary Housing (p. 2-19)**

A range of incomes is essential to making new urbanist communities vital and vibrant. The HCDA should require that all reserved housing units be provided on site. Otherwise, developers can find a way to restrict reserve housing to one section of Kakaako or outside of Kakaako altogether.

**Public Facilities Program (pp. 2-24 - 2-25)**

Although not a true public facility, grocery stores are a necessary quasi-public facility needed to make residential communities successful. The plan must accommodate the development of places for people to shop for food in order to be complete.

**Intersection Operating Conditions (p. 3-16)**

Most traffic analysts consider level of service of E to be unacceptable. The usual range of acceptable levels is from A to D.

**For Bicycle Facilities (p. 3-25)**

Shouldn't the first line of this section be "operational impact on bicycle facilities" instead of "pedestrian facilities"? It is also hard to image that this plan could create any more hazardous conditions for bicyclists than already exist in this area. We are glad that HCDA at least acknowledges that the plan should attempt to make things better.

**Pedestrian Impacts (pp.3-29-3-30)**

In the last paragraph of this section there is a discussion on how the exact impact of the Draft Mauka Area Plan on pedestrian operation will be difficult to estimate because of the wide range of development that may be proposed in this area. However, the HCDA could impose certain conditions, like the optimal number of curb cuts or driveways allowed per block and where they might occur. This may eliminate some uncertainty from an analysis. Couldn't several assumptions be made on how much pedestrian traffic could occur and then run some type of analysis to try to estimate impacts? It seems that in attempting to develop this area as a walkable community that the planners should have at least an educated guess as to how pedestrian traffic will be impacted.

Mr. Peter Rappa  
Page Three  
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many jurisdictions consider LOS E unacceptable, given the high potential for traffic growth between Existing Conditions and Cumulative Conditions – a 23-year timeframe – it is expected that traffic operations will generally worsen even without the adoption of the Draft Mauka Area Plan. Given these considerations, a LOS of E may then be the standard, particularly for an urban area such as the Mauka Area.

- *Bicycle Facilities.* The reference to 'pedestrian facilities' will be replaced with 'bicycle facilities'.
- *Pedestrian Impacts.* The intent of the SEIS is to evaluate the changes in the pedestrian environment as proposed by the Draft Mauka Area Plan; including the upgrade of all pedestrian intolerant streets to pedestrian tolerant environments where facilities are proposed. The Transportation Analysis assumes that pedestrians will comprise approximately 8 percent of the modal split.
- *Bicycle Impacts.* We will coordinate with the State Department of Transportation and City and County of Honolulu Department of Transportation Services on providing bicycle facilities on Ala Moana and Kapiolani Boulevards. Options we are considering include:
  - Provide a multi-use path to accommodate a wide variety of non-motorized transportation. Development of a multi-use path would require acquiring additional private land or create a public use easement. The State DOT is amenable to maintaining the private easement if plans are reviewed and approved by the DOT.
  - Create wider curb lanes to create a bicycle route for most major streets in the Mauka Area, including Ala Moana Boulevard, Kapiolani Boulevard, King Street, Beretania Street, Ward Avenue, and Pensacola Street. Creating a wider curb lane on streets with limited right-of-way width will require the

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**Bicycle Impacts (p. 3-30)**

Ala Moana and Kapiolani Blvd are the major east-west corridors in Kakaako Mauka. By not constructing class 2 facilities for bicyclists you are making it difficult for them to use those corridors. Both Ala Moana and Kapiolani are wide avenues. Granted they are used by large numbers of automobiles and buses, but what does this say about the seriousness of the city and county government to provide for bicyclists when they refuse to take meaningful actions to encourage biking? Both King and Berntania streets are too far away for bicyclists to use to ride to Kakaako. Either bicyclists will ride on car-packed streets or not ride at all. When will bicyclists get equal consideration for the use of roads?

**On-Street Parking (p. 3-31)**

How many existing parking spaces are located in the Kakaako Mauka area? What proportion of the 2030 Kakaako Mauka population do you anticipate will own cars and need parking space? What proportion of the population do you anticipate will utilize alternative forms of transportation?

**Picture 3-29 (p. 3-54)**

The description of this picture should say "Mother Waldron Park".

**Legibility and Urban Identity (pp. 3-57 - 3-58))**

The line on the top of page 3-58 is a repeat of the last line on page 3-57.

**Potential Impacts and Mitigation Measures (pp. 3-69 - 3-70)**

One of the most important impacts is left out of this analysis but it should be noted. By accommodating growth in this already heavily urbanized area, other areas that are rural or agricultural in nature can be saved from urban development. Developing areas that are already near existing infrastructure will save the cost of extending infrastructure to areas where it does not currently exist. This is the essence of in-fill development and it should be noted that this is a favorable impact of building more residences in this area.

**Hydrology and Storm Drain Design (pp. 3-83 - 3-84)**

Why not require that developers design water retention that keeps most of the storm water on site? By building rooftop gardens and building catchment systems most of the water that enters Kakaako can be kept on-site. Water in catchment systems can be used to irrigate the new flora that will be developed throughout the area. Cities such as Portland, Oregon have design requirements to keep storm water on-site. Honolulu would benefit by using stored storm water or irrigation instead of potable water.

Mr. Peter Rappa  
Page Four  
May 6, 2009

acquisition of additional private property or a use easement.

A discussion of future bicycle facilities shall be provided in Section 2.6.3 of the Final SEIS.

- *On-Street Parking.* Estimating parking demand is dependent a number of factors including:

- The availability of off-street parking spaces.
- The type of development project (commercial, industrial, elderly, family, luxury, market, and low-income residential).
- The presence of travel demand management measures such as unbundled parking, which would reduce parking demand.

To date, new development projects have provided 12,563 off-street parking stalls within the District. The Transportation Analysis proposes a non-auto mode share of approximately 35 to 40 percent under the Preferred Alternative, based on observed mode shares in other neighborhoods similar to the Mauka Area.

- *Picture.* The City and County of Honolulu Department of Planning and Permitting stated that the official name of the Mother Waldron Park is the Mother Waldron Neighborhood Park. The Final SEIS will be revised to include the correct reference.
- *Legibility and Urban Identity.* Errors pertaining to format will be addressed in Section 3.10.2 of the Final SEIS.
- *Positive Impacts and Mitigation Measures.* Chapter 4 of the Final SEIS shall include a discussion on in-fill development

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Page 5

**Cumulative and Secondary Impacts** (pp. 5-2 – 5.3)

In the discussion on cumulative and secondary impacts no mention is made of the impact of small businesses leaving Kakaako and relocating to other areas. In the DEIS mention is made that some of the businesses in Kakaako may move to Kalihi, yet there is no discussion on what that will mean for Kalihi (secondary impact). Will this mean that there will be more body shops in Kalihi, more traffic, etc? This is an issue that needs some analysis in a section on secondary impacts.

**Probable Adverse Environmental Effects that Cannot be Avoided** (pp. 5-4 – 5-5)

A discussion on the dislocation of people and businesses which the DEIS has said will be unavoidable in some cases should have been included in this section.

Thank you for the opportunity to review this Draft SEIS.

Sincerely,



Peter Rappa  
Environmental Review Coordinator

cc: OEQC  
Kevin Butterbaugh, EDAW  
Katherine Puana Kealoha, c/o OEQC  
James Monour, WRRC  
Ryan Riddle

Mr. Peter Rappa  
Page Five  
May 6, 2009

and the positive long-term impact of accommodating growth in the heavily urbanize area of Honolulu.

- *Hydrology and Storm Drain Design.* Section 3.13.2 of the Final SEIS shall include mitigation measures such as rooftop gardens and building catchment systems to retain storm water on-site as part of sustainability effort.
- *Cumulative and Secondary Impacts.* Secondary impacts of the relocation of small businesses are addressed in Chapter 5 of the Final SEIS. We would like to note that one of the guiding principles of urban design is to support the small-lot, mixed-use pattern of Central Kakaako where majority of the small lots and businesses are located. The strategy for Central Kakaako is to support the viability of small business while allowing for potential future re-use of small properties through selective improvements to streets and parking. The intent is to minimize disruption and displacement of existing businesses.
- *Probable Adverse Environmental Effects that Cannot be Avoided.* A discussion on the dislocation of people and businesses will be included in Section 5.3 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

**BOARD OF WATER SUPPLY**

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



August 21, 2008

12532-41

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Web site  
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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Anthony J. H. Ching  
Executive Director  
State of Hawaii  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Ching:

**Subject:** Your Letter Dated July 8, 2008 on the Draft Supplemental Environmental Impact Statement (SEIS) Revisions to the Kakaako Mauka Area Plan and Rules, TMK: 2-1-9, 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, and 56, 2-3-1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and 11

Thank you for your letter on the proposed Draft SEIS for the revisions to the Mauka Area Plan and Rules.

A revised water master plan should be submitted for the Kakaako Mauka Area.

The availability of water will be confirmed when the building permit applications are submitted for approval.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,  
  
KEITH S. SHIDA  
Program Administrator  
Customer Care Division

Mr. Keith S. Shida  
Program Administrator  
Customer Care Division  
Honolulu Board of Water Supply  
City and County of Honolulu  
630 South Beretania Street  
Honolulu, Hawaii 96813

Dear Mr. Shida:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. A water master plan for the Mauka Area is included in Appendix E, Infrastructure Plan. The water master plan will be submitted to the Honolulu Board of Water Supply ("BWS").

We acknowledge that the availability of water will be confirmed for projects when building permit applications are submitted to the BWS for approval. When water is made available, the applicant will be required to pay the BWS Water System Facilities Charges for resource development, transmission and daily storage.

We appreciate your interest and participation in the environmental review process.

Sincerely,  
  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11<sup>TH</sup> FLOOR  
HONOLULU, HAWAII 96813  
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MUFI HANNEMANN  
MAYOR



EUGENE C. LEE, P.E.  
DIRECTOR  
RUSSELL H. TAKARA, P.E.  
DEPUTY DIRECTOR

August 5, 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

RECEIVED  
AUG 9 7 2008

Dear Mr. Butterbaugh:

Subject: Draft Supplemental Environmental Impact Statement  
Revisions to the Kakaako Mauka Area Plan and Rules

Thank you for giving us the opportunity review the above Draft Supplemental Environmental Impact Statement.

The Department of Design and Construction has the following comments:

- The official name for Mother Waldron Playground is now "Mother Waldron Neighborhood Park." We would appreciate the Final Supplemental Environmental Impact Statement reflecting this name change.
- The DSEIS misstates the City's standard for park acreage on page 2-7 of Section 2.5.1. The City's park system provides approximately 8.1 acres per 1,000 residents for all park facilities, including an extensive network of beach parks and major regional parks (such as Ala Moana Regional Park), botanical gardens, urban parks (such as Thomas Square), beach rights-of-way, pedestrian malls, nature parks and preserves, and the Honolulu Zoo. The standard of two acres per thousand residents applies to Community-based parks only (Neighborhood, Community, and District Parks) that provide active recreational facilities, such as play courts (e.g., basketball, volleyball, tennis), ball fields (e.g., baseball, softball, football, soccer), recreation centers, gymnasiums, swimming pools, and play apparatus for the public.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
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Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Eugene Lee  
Department of Design and Construction  
City and County of Honolulu  
650 South King Street, 11th Floor  
Honolulu Hawaii 96813

Dear Mr. Lee:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 5, 2008 regarding the subject Draft SEIS. We offer the following responses in the respective order of your comments.

- The Final SEIS shall use *Mother Waldron Neighborhood Park*, instead of *Mother Waldron Playground*. The name change shall be reflected throughout the Final SEIS.
- Section 2.5.1, *Parks and Open Space* of the Final SEIS shall be revised to include the City's standard for all park facilities as well as community-based parks only.
- We acknowledge that the Kakaako Community Development District is lacking in Community-based parks for active recreational use. Section 3.10.2 of the Final SEIS shall include a discussion on project need and impacts on Parks, Open Space and Views.
- We acknowledge your request that the Hawaii Community Development Authority ("HCDA") follow the example of the City and County of Honolulu's park dedication requirements as a formula to create additional park facilities. Based on your request, we will re-evaluate our recreational requirement through the Mauka Area Rules amendment process, pursuant to Chapter 91, Hawaii Revised Statutes.

Mr. Kevin Butterbaugh

-2-

August 5, 2008

- The Kakaako Community Development District is sorely lacking Community-based type park facilities for active recreational use, and the proposed Draft Mauka Area Plan leaves this critical need unaddressed. Although the plan is commendable in its emphasis on making the area more bike- and pedestrian-friendly and promoting green, open spaces, and linking them together, the actual land areas proposed are grossly inadequate in size relative to the population growth expected and the opportunity present to provide more park space, especially of the active, Community-based park type.
- In our previous comment letter relating to your EIS Preparation Notice, we stated our recommendation that the Hawaii Community Development Authority (HCDA) follow the example of the City and County of Honolulu Park Dedication requirements as a formula to create additional park facilities appropriate for the projected population growth. We would like to reiterate that request. The HCDA has the statutory authority and obligation to provide the needed land areas for the appropriate recreational needs of Honolulu residents. If the HCDA fails to do so, the additional anticipated population growth for this area will overburden an already barely adequate supply of active public recreational facilities in the Primary Urban Center of Honolulu.
- The HCDA is projecting a possible future population of 24,000 more residents and more than 16,400 new housing units. The projected total population of over 30,000 residents for the subject area indicates the need for up to six Neighborhood parks (each four to six acres in size) and three Community parks (10 acres in size), and one District park (typically about 20 acres in size), or a total of approximately 70 acres, based upon the City's adopted standards to satisfy active recreational needs of the area's residents.
- Given the fact that extensive redevelopment is planned for the Kakaako Mauka Area and the two largest private land owners, Kamehameha Schools Bishop Estate and General Growth Properties, together own 111 acres of the total of approximately 450 acres, we believe that the HCDA has a responsibility to require considerably more land be dedicated to public park use, especially of an active recreational type.
- For example, for Residential-zoned properties, the City requires dedication of 350 square feet of park space for each residential unit. Even for Apartment-zoned districts that are usually constructed with multi-family units like those that will predominate in the Mauka Area, a City park dedication of 110 square feet per unit is required -- twice the present HCDA requirement for park space.

Mr. Eugene Lee  
Page Two  
May 6, 2009

We would like to note, however, that in addition to the recreational requirement, HCDA requires developers to dedicate public facilities in the amount of (1) three percent of the total commercial and community service floor area of the development, exclusive of nursing facilities and assisted living facilities; and (2) four percent of the total residential floor area, exclusive of floor area devoted to reserved housing units. If it is determined that dedicating land is not in the best interest of the public, the developer shall pay instead a fee in the sum equal to the fair market value of the land area required. The HCDA may expend the moneys for the purchase, creation, expansion, or improvement of public facilities, including parks and recreational facilities. To date, approximately \$3.38 million has been expended (or approved to be expended) from public facilities dedication fees for parks within the Mauka Area. In addition, the HCDA has acquired approximately 98,000 square feet of land through public facilities dedication for the expansion of the Mother Waldron Neighborhood Playground and Makai Gateway Park. Section 3.10.2 of the Final SEIS will include a discussion on recreational requirement for the Mauka Area.

- HCDA will consider increasing the recreational requirement from 55 square feet per unit to 110 square feet per unit. The additional requirement will be discussed in Section 3.10 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

Mr. Kevin Butterbaugh

-3-

August 5, 2008

- A calculation of the anticipated 16,000 new housing units HCDA expects to see constructed in the Mauka Area up to the year 2030 with the minimum City standard of 110 square feet of park space yields a total park acreage of more than 40 acres, somewhat less than 10 per cent of the total land area. Although this is still substantially less acreage than the City standard for the population it is supposed to serve, it comes much closer to reaching that standard than present HCDA park dedication requirements. We respectfully urge the HCDA to amend its park dedication requirements to fulfill its responsibilities for creation of active public parks.

Should you have any questions, please contact Clifford Lau, Chief of the Facilities Division, at 768-8483.

Very truly yours,



FOR Eugene C. Lee, P.E.

ECL:it (269842)

c: DDC Facilities Division

DEPARTMENT OF FACILITY MAINTENANCE  
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707  
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MUFI HANNEMANN  
MAYOR



July 23, 2008

CRAIG I. NISHIMURA, P.E.  
DIRECTOR AND CHIEF ENGINEER  
GEORGE "KEDIKI" MIYAMOTO  
DEPUTY DIRECTOR

IN REPLY REFER TO:  
DRM 08-599

Mr. Anthony J. H. Ching  
Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

RECEIVED  
JUL 28 2008

Dear Mr. Ching:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)  
Revisions to the Kakaako Mauka Area Plan and Rules, Tax  
Map Keys: 2-1-29, 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52,  
53, 54, 55 and 56; 2-3-01, 02, 03, 04, 05, 06, 07, 08, 09, 10  
and 11, Honolulu, Oahu, Hawaii

Thank you for giving us the opportunity to comment on the subject SEIS. We  
have no comments to offer at this time.

Should you have any questions, please call Larry Leopardi, Chief of the Division  
of Road Maintenance, at 768-3600.

Sincerely,

Craig I. Nishimura, P.E.  
Director and Chief Engineer

c/ EDAW, Inc.  
Hawaii Community Development  
Authority (Susan Tamura)



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAAKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Jeffrey S. Cudiamat, P.E.  
Director and Chief Engineer  
Department of Facility Maintenance  
City and County of Honolulu  
1000 Ulu'ohia Street, Suite 215  
Kapolei, Hawaii 96707

Dear Mr. Cudiamat:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of July 23, 2008 stating that you have no  
comments to offer on the subject Draft SEIS.

We appreciate your interest and participation in the environmental review  
process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

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CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN  
MAYOR



RECEIVED  
AUG 15 2008

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

August 12, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh and Ms. Tamura:

Subject: Draft Supplemental Environmental Impact Statement  
Revisions to the Kakaako Mauka Area Plan and Rules  
Tax Map Keys: 2-1-029 to 032; 044; 046 to 056; and  
2-3-001 to 011

In response to a letter from Mr. Anthony Ching of the Hawaii Community Development Authority dated July 8, 2008, regarding the above-mentioned project, the Honolulu Fire Department reviewed the materials provided and determined that the proposed development will impact the services it provides. Therefore, we request that you comply with the following:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet (45 720 mm) from fire apparatus access as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)
2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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96813

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E-Mail:  
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Web site:  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

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

Dear Chief Silva:

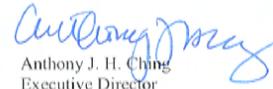
Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 12, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

All projects within the Mauka Area will be required to comply with City and County of Honolulu building and fire code requirements. Section 3.14, Public Services and Facilities of the Final SEIS will include a discussion on project compliance with fire protection requirements of the Honolulu Fire Department's Fire Prevention Bureau, including access for fire apparatus, water supply and building construction.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

Mr. Kevin Butterbaugh  
Ms. Susan Tamura  
Page 2  
August 12, 2008

facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2, as amended.)

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

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

Sincerely,



KENNETH G. SILVA  
Fire Chief

KGS/SK.bh



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII 96813-3065

**ANN H. KOBAYASHI**  
Chair, Executive Matters Committee  
Councilmember, District V  
(Manoa/McCully-Moiliili/Ala Moana/  
St. Louis Heights/Palolo/Kapahulu)  
Ph: 768-5005 Fax: 768-5011  
email: akobayashi@honolulu.gov

August 21, 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

RE: Draft Mauka Area Plan Supplemental Environmental Impact Statement (SEIS)

Thank you for the opportunity to review and comment on the HCDA's Draft Mauka Area Plan Supplemental Environmental Impact Statement (SEIS).

I support the principles in the SEIS that specify the following outcomes:

- Create an outstanding pedestrian environment and network of green streets;
- Provide for maximum road connections and pedestrian paths across major thoroughfare;
- Support the small-lot, mixed-use pattern of Central Kaka'ako; and
- Support transit oriented development.

My concern, however, is that the Draft SEIS does not adequately address existing community needs, particularly for such areas as Sheridan and central Kaka'ako. In order to provide your agency with an updated snapshot of the socio-economic and demographic profiles, and reported needs of the Sheridan and central Kaka'ako communities, please find attached a copy of the Final Report and Quarterly Report No. 4 for Contract Entitled "Transit Oriented Community-based Development Project" and Appendices A and B (March 31, 2008). This study was commissioned by the City Council of Honolulu and completed this year pursuant an agreement executed in 2007.

Thank you for the opportunity to submit these comments to your agency. Your consideration is greatly appreciated

Sincerely,

  
Ann Kobayashi, Councilmember  
District 5

RECEIVED  
AUG 22 2008



Linda Ingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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Ref. No.: PL EIS 6.26

May 6, 2009

The Honorable Duke Bainum  
Councilmember  
Honolulu City Council, District 5  
City and County of Honolulu  
530 South King Street, Room 202  
Honolulu, Hawaii 96813

Dear Councilmember Bainum:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

This is in response to a letter dated August 21, 2008 that was submitted by Councilmember Kobayashi regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to the comments.

With regard to concerns on addressing existing community needs, particularly for such areas as Sheridan and Central Kakaako, Section 3.11 of the Final SEIS will include a discussion on the existing community issues in the Mauka Area neighborhoods.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

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

KAPOLEI HALE • 1000 ULUOHIA STREET, SUITE 309 • KAPOLEI, HAWAII 96707  
TELEPHONE: (808) 768-3003 • FAX: (808) 768-7053 • INTERNET: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



RECEIVED  
AUG 15 2008

LESTER K. C. CHANG  
DIRECTOR

GAIL V. HARAGUCHI  
DEPUTY DIRECTOR

August 14, 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

Subject: Draft Supplemental Environmental Impact Statement  
Revision to the Kakaako Mauka Area Plan and Rules  
Tax Map Keys: 2-1-29, 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52,  
53, 54, 55 and 2-3-01, 02, 03, 04, 05, 06, 07, 08, 09, 10 and 11

Thank you for the opportunity to review and comment on the subject Draft Environmental Impact Statement for revisions to the Mauka Area Plan.

It is our understanding that the Hawaii Community Development Authority requires each development with 20,000 square feet or more to provide 55 square feet of on site recreation space per dwelling unit.

Recognizing on site recreation space complements high density multifamily residential developments with limited recreation space and facilities, we are also aware the residents in existing as well as proposed multifamily developments in the Kakaako Mauka Area are and will be users of off site parks and facilities such as ballfields, gymnasiums, play courts, ocean recreation, picnicking and outdoor family activities requiring the open space only available in larger parks.

There has been a significant increase in the use of parks in the high density urban corridors of downtown and Waikiki since most of the existing parks were developed resulting in the parks being stressed to beyond their intended capacity and the costs to maintain them in the condition expected is high.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKA'AKO  
KALAELOA

Linda Iingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
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Ref. No.: PL EIS 6.26

May 6, 2009

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

Dear Mr. Chang:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 14, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We confirm that, the existing Mauka Area Rules require all residential development projects with a lot size of 20,000 square feet or more is required to provide 55 square feet of recreation space per dwelling unit. Your recommendation that we revise the Mauka Area Plan to include a requirement for developers to dedicate off-site, in addition to or in-lieu of, on-site park and recreation space is noted. We also acknowledge that if land is not available or not economically feasible to acquire, developers can opt to pay cash for the equivalent value of land they would otherwise be required to provide.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

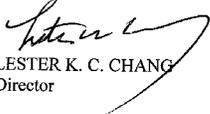
Mr. Kevin Butterbaugh  
August 14, 2008  
Page 2

The Department of Parks and Recreation recommends that HCDA revise the Kakaako Mauka Area Plan to include a requirement for developers to dedicate off site, in addition to or in lieu of on site park and recreation space similar to the requirements of the City's Park Dedication Ordinance.

If land is not available or not economically feasible to acquire, developers can opt to pay cash for the equivalent value of land they would otherwise be required to provide and that money used to upgrade and or improve existing park and recreation facilities in and around the Kakaako Mauka Area.

If there are any questions, please give me a call at 768-3001.

Sincerely,



LESTER K. C. CHANG  
Director

LKCC:jr  
(269874)

cc: Ms. Susan Tamura, Hawaii Community Development Authority

DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**  
 650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813  
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MUFI HANNEMANN  
MAYOR



HENRY ENG, FAICP  
DIRECTOR

DAVID K. TANOUE  
DEPUTY DIRECTOR

2008/ELOG-1699(RY)

August 22, 2008

EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Attention: Kevin Butterbaugh

Dear Mr. Butterbaugh:

Subject: Draft Supplemental Environmental Impact Statement  
Kakaako Community Development District, Draft Mauka Area Plan

We have reviewed the subject document and would like to offer the following comments:

We applaud your efforts to preserve existing mauka-makai views by reducing allowable building footprints and requiring the shorter building facades to face mauka or makai. In addition, we agree that lowering building height limits for towers along Ala Moana Boulevard would complement efforts to retain important visual corridors to the mountains and the sea which also promotes a varied skyline.

We remain very concerned over the lack of adequate park space. The proposal for shared use of school facilities may provide additional access to existing recreational facilities but that would not meet or replace our park dedication requirements. The addition of "green" street, to promote walking and bicycling is commendable but that also does not meet park dedication requirements. As indicated in the SEIS, the provision of on-site recreational facilities, on a project-by-project basis, may be a remedy but those spaces are generally too small to accommodate recreational activities associated with ball play; i.e., soccer, baseball, football, tennis, which are preferred over private recreational spaces. In addition, it is likely that private facilities will be severely limited by operational hours and type of permitted activity as they may impact residences of the project or other residences in close proximity. Without sufficient park facilities, the additional population projected for the build-out of the Mauka Area Plan



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



**KAKAAKO  
KALAELOA**

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Governor

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Chairperson

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Executive Director

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. David Tanoue, Director  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street, 7th Floor  
Honolulu Hawaii 96813

Dear Mr. Tanoue:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

Your concern over the lack of adequate park space is noted. The Final SEIS includes a full disclosure of the status of park space within the Kakaako District as well as strategies for meeting the project need, including possible bonus density for providing active recreational space.

With regard to the provision of affordable housing, the Hawaii Community Development Authority ("HCDA") recently revived an affordable housing project, The Halekauwila Place Project, in the Mauka Area. Upon completion, the Project will provide 201 residential units for tenants earning 80 percent to 140 percent of Honolulu's median family income, which was \$73,800 in 2008 (\$59,040 to \$103,320). The project was revived when HCDA agreed to make a \$15 million loan to allow a local developer to proceed with the project. This project notwithstanding, HCDA will continue its effort to increasing the inventory of reserved housing in the Mauka Area. The Draft Mauka Area Plan's Reserved Housing program targets the workforce or gap-group housing instead of the entire affordable spectrum. HCDA's focus will be to stimulate the production of housing for workforce buyers from 100% to 140% of Area Median Income. As stated in the Draft SEIS, other state agencies such as the Hawaii Housing & Finance Development Corporation ("HHFDC") are better equipped to address the need of developing housing for the lower income groups.

Mr. Kevin Butterbaugh  
 EDAW, Inc.  
 August 22, 2008  
 Page 2

Project) will place severe strains on existing City park facilities in and around the Project. The additional demand generated by the Project on existing facilities is unacceptable as it will create additional burden on City maintenance and resources necessary to fund the increased maintenance.

We suggest that the HCDA and the State Legislature reassess the need for public open space and park facilities to address the anticipated unmet demand for park facilities as a result of this Project. As the Mauka Area Plan provides for the long term planning of Kakaako, we have an opportunity to address the lack of recreational facilities in a comprehensive manner. Measures to consider could include creative funding programs in exchange for greater density or a reduction in other development/building requirements which do not impact health and safety, or enforcement of the City's park dedication ordinance. Ultimately, the HCDA should set aside land area for the development of much needed park facilities somewhere in Kakaako.

With respect to the provision of affordable housing, we note that the Mauka Area Plan's primary focus is on workforce housing. Section 2.7.5 indicates that for projects on lots with land area of 20,000 square feet or more, 20 percent (20%) of the project's housing units would be set aside for either sale or rent at prices affordable to a buyer or tenant with income ranging from 100 percent (100%) to 140 percent (140%) of the area's median income. The provision of rental housing units are intended to for tenants with incomes of up to 100 percent (100%) of the area's median income. The developer is allowed the choice of providing for-sale units or rental units. The City's affordable housing policy is to provide units to the entire affordable spectrum, especially those whose income are at or below 80 percent (80%) of the area's median income. As there are no provisions to require or encourage developers to provide affordable units at the lower end of the affordability spectrum, we are concerned that this need will not be addressed.

We acknowledge your statement that the Hawaii Housing Finance & Development Corporation (HHFDC) may be better qualified to address the provision of affordable housing for the lower income group. However, we are not aware of any affordable housing projects being developed by HHFDC in the Mauka Area Plan area nor have we been assured that such housing would be developed by HHFDC in the Mauka Area. Therefore, we reiterate our concerns and strongly encourage the Mauka Area Plan rules include requirements for the development of lower income housing that addresses families whose income fall at or below 80 percent (80%) of the area's median income, within the project area.

Mr. David Tanoue, Director  
 Page Two  
 May 6, 2009

Traffic Comments:

1. The purpose of the transportation analysis presented in the SEIS is to evaluate the Draft Mauka Area Plan as proposed by HCDA. The roadway master plan associated with the Draft Mauka Area Plan will be included in the Final SEIS and in the Appendix C, Transportation Analysis.
2. The Mauka Area Plan Transportation Plan includes smart growth principles, which is reflected in the provision for multi-modal transportation designed to move people and goods safely and efficiently, and to service the demands of the Kakaako district activities. An emphasis is placed on pedestrian movement throughout the area, in keeping with the urban village concept.
3. Your recommendation to improve Koula and Ohe Streets is noted. With regards to improving Koula, and Ohe Streets, given that neither of these streets are through-streets, it is not expected that a significant amount of traffic would make use of Koula and Ohe Streets, even after development of the wharf area. The portions of Koula and Ohe Streets, which are currently proposed for closure to vehicular traffic, primarily serve as local access for residents and businesses in the Mauka Area. Given these considerations and the proximity of Cooke Street and the improved Ahui Street--both through-streets into the Makai Area, it is not expected that the improvement of these roadways would provide any significant benefit to roadway access to and from future developments in the wharf area. Such measures would also significantly increase delays for traffic using Ala Moana Boulevard.
4. During the implementation period of the Mauka Area Plan over the course of 25 to 30 years, all roads in the Mauka Area are proposed to be improved to "pedestrian tolerant" levels, with curbs and sidewalks.

Mr. Kevin Butterbaugh  
 EDAW, Inc.  
 August 22, 2008  
 Page 3

We have the following additional comments:

Traffic Comments

1. A detailed roadway master plan should be prepared as part of the overall Kakaako development plan and should include provisions for the makai area, as well as roadways adjacent to the Kakaako boundary. The roadway master plan should include pavement and sidewalk widths, travel lane details, length of turn lanes and other pertinent information.
2. The roadway infrastructure plan should incorporate "smart growth" and street connectivity principles to the greatest extent practical. These may include extending Cummins Street to not only Ala Moana Boulevard in the makai direction, but also to Kapiolani Boulevard in the mauka direction, extending Ilaniwai Street to Kamakee Street, and other roadway extensions, as deemed necessary.
3. In addition to improving Ahui Street, Koula and Ohe Streets should be improved since they may carry a major portion of the makai area traffic if the wharf area is developed in the future as expected.
4. Greater emphasis should be placed on improving existing roadways which currently do not have curbs and sidewalks before implementing proposed improvements to existing improved roadways.
5. Updates to the traffic impact analysis report should be prepared every two (2) years to assess intersections and approaches which have experienced a significant increase in traffic. The updates should include an analysis of intersection traffic signal warrants.

Wastewater Comments

1. A wastewater master plan for this area pursuant to the Design Standards of the Department of Wastewater Management, Volume 1, dated July 1993, is required. The submittal and review of the wastewater master plan can be separate from the environmental impacts statement review process.
2. Submittal and approval of a Site Development Master Application for Sewer Connection is required at the time of building permit application.
3. The following acronyms should be corrected: "Sand Island Wastewater Treatment Plant" to "Sand Island WWTP" and "Ala Moana Wastewater Pump Station" to "Ala Moana WWPS".

Mr. David Tanoue, Director  
 Page Three  
 May 6, 2009

5. We acknowledge your recommendation that the traffic impact analysis be updated every two years to assess intersections and approaches which have experienced a significant increase in traffic. Any update to the traffic impact analysis would be contingent upon availability of funds.

Wastewater Comments:

1. A wastewater master plan for the project area pursuant to the "Design Standards of the Department of Wastewater Management, Volume 1," dated July 1993 is provided in Appendix E, Infrastructure Plan.
2. We acknowledge that submittal and approval of a Site Development Master Application for Sewer Connection is required at the time of building permit application.
3. The correct name for Sand Island WWTP and Ala Moana WWPS is cited in the Final SEIS and the associated Infrastructure Plan.
4. We acknowledge that the Infix program has been adopted by the Department of Design and Construction ("DDC") to determine design sewer flow estimates based on anticipated individual lot usage and density. The DDC was consulted for the review of this section.
5. Any reference to Department of Public Works in the Draft SEIS shall be changed to Department of Environmental Services ("ENV") in the Final SEIS.

Engineering:

1. Chapter 4.2.6 of the Final SEIS notes that trenching permit will be required within City right-of-way and a dewatering permit will be required of projects to discharge dewatering effluent into the City's MS4.

Mr. Kevin Butterbaugh  
 EDAW, Inc.  
 August 22, 2008  
 Page 4

4. Infix, an infiltration program used for flow calculations, fall under the jurisdiction of the Department of Design and Construction (DDC), not the Department of Planning and Permitting. We suggest that DDC be consulted to review that portion of the report.
5. Please correct any references "DPW" to the "Department of Environmental Services (ENV)".

#### Engineering

1. A trenching permit will be required for work within the City's right-of-way and a dewatering permit will be required to discharge dewatering effluent into the City's MS4.
2. In accordance with Section II of the "Rules Relating to Storm Drainage Standards", storm water quality requirements for development and redevelopment projects will need to be addressed.

#### Drainage

1. References used should cite the Rules Relating to Storm Drainage Requirements January 2000 and Rules Relating to Soil Erosion Standards and Guidelines April 1999. Any references in the preliminary environmental impact analysis should be updated to reference the current rules and guidelines.
2. Sections 2.12 and 3.13 of the DEIS references the 100-year, 24 rainfall event and the resulting discharge. The DEIS should address Plate 6 discharge since the study area is 2,000 acres.
3. Sub-watershed areas (less than 100 acres) can be analyzed using the 10-year or 50-year storm events.
4. The DEIS states the existing capacity of the drainage infrastructure is inadequate. Accordingly, any additional discharge above the existing condition shall be retained on-site.
5. Table 3-13 should be revised to reflect the Plate 6 discharges for those drainage areas greater than 100 acres.

Mr. David Tanoue, Director  
 Page Four  
 May 6, 2009

2. The Final SEIS notes that project applicants will be required to address storm water quality requirements in accordance with Section II of the City's "Rules Relating to Storm Drainage Standards".

#### Drainage:

1. The Final SEIS cites the Rules Relating to Storm Drainage Requirements, January 200 and Rules Relating to Soil Erosion Standards and Guidelines, April 1999.
2. In the case of the Draft Mauka Area Plan, Plate 6 is used to estimate the storm runoff from the 100-year, 24-hour rainfall event since the project area is approximately 2,000-acres, exceeding the City's 100-acre threshold for design storm methodology. The Final SEIS explicitly states that Plate 6 is used.
3. We acknowledge that sub-watershed (less than 100-acres) can be analyzed using the 10-year or 50-year storm events.
4. We acknowledge that any additional discharge above the existing condition shall be retained on-site. City requirements for retaining all additional storm water in excess of the existing condition for individual projects shall be included in the Final SEIS.
5. Clarification of the Plate 6 discharges used for those drainage areas greater than 100-acres is made to Table 3-13 in the Final SEIS. Please note that Table 3-13 in the Draft SEIS reflects the Plate 6 discharges for the drainage areas greater than 100-acres; however, other recurrence frequencies are listed for comparison purpose only. Table 3.13 will be revised in the Final SEIS for clarification purposes.

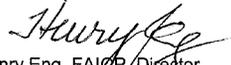
Mr. Kevin Butterbaugh  
EDAW, Inc.  
August 22, 2008  
Page 5

Other

- 1. Cross sections and sidewalk/planter details should be provided for proposed promenades. The graphic should include dimensions, suggested landscaping materials and appropriate street furniture.

Thank you for the opportunity to comment. Should you have any questions, please contact Raymond Young of our staff at 768-8049.

Very truly yours,



Henry Eng, FAICP, Director  
Department of Planning and Permitting

HE:lh  
Doc. 640267

cc: HCDA - S. Tamura

Mr. David Tanoue, Director  
Page Five  
May 6, 2009

Other:

- 1. Cross-sections and sidewalk/planters details are provided in the Draft Mauka Area Plan. Dimensions, suggested landscaping materials and appropriate street furniture are included as well.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

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

HUFI HANNEMANN  
MAYOR



BOISSE P. CORREA  
CHIEF

PAUL G. PUTZULU  
KARL A. GODSEY  
DEPUTY CHIEFS

OUR REFERENCE BS-KP

July 22, 2008

RECEIVED  
JUL 24 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

This is in response to a letter from the Hawaii Community Development Authority, dated July 8, 2008, requesting comments on a Draft Supplemental Environmental Impact Statement for the Revisions to the Kakaako Mauka Area plan and Rules project.

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

If there are any questions, please call Major Clayton Saito of District 1 at 529-3386 or Mr. Brandon Stone of the Executive Office at 529-3644.

Sincerely,

BOISSE P. CORREA  
Chief of Police

By *William Chen*  
for DEBORA A. TANDAL  
Assistant Chief of Police  
Support Services Bureau

cc: Ms. Susan Tamura, Hawaii  
Community Development Authority

*Serving and Protecting With Aloha*



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAAKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Boisse P. Correa  
Chief  
Honolulu Police Department  
City and County of Honolulu  
801 South Beretania Street  
Honolulu, Hawaii 96813

Dear Chief Correa:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of July 22, 2008 stating that the proposed revisions to the Mauka Area Plan and Rules should have no unanticipated impact on the facilities or operations of the Honolulu Police Department.

We appreciate your interest and participation in the environmental review process.

Sincerely,

*Anthony J. H. Ching*  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

Hawaiian Telcom

RECEIVED  
JUL 24 2008

July 21, 2008

EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attention: Mr. Kevin Butterbaugh

Dear Mr. Butterbaugh:

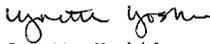
Subject: **Draft Supplemental Environmental Impact Statement  
("SEIS") Revisions to the Kakaako Mauka Area Plan and  
Rules**

Thank you for the opportunity to review and comment on the Draft SEIS for the Revisions to the Mauka Area Plan and Rules.

The only revision we have to offer at this time is that our official company name is Hawaiian Telcom, Inc. not Hawaiian Telecom. Please continue to include us during the design stages of the project.

If you have any questions or require assistance in the future on this project, please call Les Loo at 546-7761.

Sincerely,

  
Lynette Yoshida  
Section Manager - OSP Engineering  
Network Engineering & Planning

cc: Susan Tamura - HCDA



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Lynette Yoshida  
Section Manager  
Hawaiian Telcom, Inc.  
1177 Bishop Street  
Honolulu, Hawaii 96813

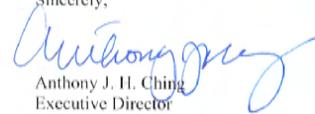
Dear Ms. Yoshida:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of July 21, 2008 notifying us that the official company name is Hawaiian Telcom, Inc. The Final SEIS will reflect the correct name of your company.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moana Blvd, Suite 1001  
Honolulu, Hawaii 98813

August 19, 2008

Re: Comments on Draft Supplemental Environment Impact Statement ("DSEIS") Mauka Plan

Dear Ms. Tamura,

First of all, we would like to thank you for letting us take this opportunity to submit comments on the Draft Supplemental Environment Impact Statement ("DSEIS"). We would like to offer the following recommendations for the DSEIS:

1. The Building Tower Element Max Height limit should remain at 400 feet along Ala Moana Boulevard. Reducing the building heights from 400 feet to 200 feet will cut the ability to provide housing or office space along Ala Moana Blvd. We request that HCDA look into the direct ramifications of making such proposed changes and specifically look at the negative impact such changes would have on reaching the city's growth goals, loss of tax revenue, lost jobs and loss of residential living space close to the city and businesses.
2. Building Tower Element Max Footprint sizes should remain as they are, reaching upwards of 16,000 square feet depending on existing lot capacity rules. Reducing footprint sizes by 7,000 square feet will again limit the ability to offer comfortable housing solutions and practical office spaces. Smaller office floor plates may make future businesses less likely to occupy those spaces and they will be seen as impracticable. Smaller residential offering will appear as less inviting for living in city. Ultimately, lack of interest in smaller footprint spaces by both businesses and residents will negatively impact the state's "live, work, play" vision.
3. Auahi Street should be opened immediately between Koula Street and Kamani Street to improve circulation and connectivity in the district. Auahi Street is designated as a "Major Street" and opening it is key to enhancing the circulation of within this community.
4. Tower Elements Footprint Ratio: The 3:1 ratio is too rigid a standard and may prove a disincentive to improve lands. We request that the DSEIS consider the direct impact on this community and the end result of the exclusion of types of buildings that can be delivered and offered by adopting such a rigid ratio standard.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKA'AKO  
KALAELOA

Linda Lingle  
Governor

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Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Jeffrey J. Prostor, President  
Brookfield Homes Hawaii Inc.  
55 Merchant Street, Suite 3000  
Honolulu, Hawaii 96813

Dear Mr. Prostor:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your letter dated August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

1. We acknowledge your suggestion that the maximum height limit should remain at 400 feet along Ala Moana Boulevard as reducing the building heights from 400 feet to 200 feet will cut the ability to provide housing or office space along Ala Moana Boulevard. The Draft Mauka Area Plan proposes no density change; therefore, the ability to provide housing or office space along Ala Moana Boulevard should not be impacted. The larger floor plates at the street and mid-height levels would be able to accommodate the existing and proposed 3.5 floor area ratio.
2. A third alternative analysis pertaining to urban form was developed to assess recommendations received through public comments. The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development.

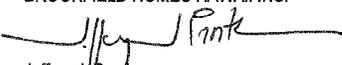
In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process

5. The Street-front Element Minimum Height should not be fixed at the greater of 40 feet or four stories but should be flexible depending on other building forms on the parcel or block to allow for courtyards and other community friendly designs and inviting open spaces. Restricting this to not include open areas or other designs would take away from an inviting and beautiful street front.

Again, thank you for your time and allowing me the opportunity to comment on proposed then plan.

Aloha,

BROOKFIELD HOMES HAWAII INC.

  
Jeffrey J. Prostor  
President

Mr. Jeffrey J. Prostor, President  
Page Two  
May 6, 2009

Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- a. Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.
- b. Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- c. Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Section 2.14 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

3. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily

Mr. Jeffrey J. Prostor, President  
Page Three  
May 6, 2009

Kamehameha Schools properties. Assessments on the traffic analysis for this road section can be found in Section 5 of the Transportation Analysis, Appendix C.

The third alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. As such, the longer side of the tower would be required to be orientated in the Mauka-Makai direction at a 3:1 ratio (length to width). This is to encourage point/slender towers with small footprint and narrow circumference or width in proportion to length/height). In keeping with this concept, the length to width ratio are required to not exceed 4:1 for residential building and 2:1 for commercial buildings on development parcels. The alternatives are presented in Section 3.10.2 of the Final SEIS and in Appendix B, UDA.

4. We acknowledge your recommendation that the Street-front Element Minimum Height should not be fixed at the greater of 40 feet or four stories, but should be flexible depending on other building forms. The height of street-front element continues to remain at the range of 40 feet to 65 feet to maintain pedestrian-scaled developments conducive to creating a sense of place. Assessments on structure heights for all three alternatives can be found in Section 3.10.2 of the Final SEIS and in Section 3.1 of Appendix B, UDA.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
e: EDAW, Inc.



## THE CONCORD GROUP

August 22, 2008

Ms. Susan Tamura  
 HAWAII COMMUNITY DEVELOPMENT AUTHORITY (HCDA)  
 677 Ala Moana Boulevard, Suite 1001  
 Honolulu, Hawaii 96813

RECEIVED  
 AUG 22 2008

## RE: COMMENTS ON THE DRAFT SEIS MAUKA PLAN

Dear Ms. Tamura:

We are pleased to offer this letter of opinion regarding a key element of the Draft SEIS Mauka Plan. Although generally favorable, we are concerned at absence of connectivity along Auahi Street between the General Growth planning area and Kamehameha Schools' lands.

TCG has served as a market consultant to Kamehameha Schools relative to the development of a mixed-use urban district on their land holdings at Kaka'ako.

While conducting our market analyses of Kaka'ako and surrounding districts in Honolulu, two objectives that have persistently been at the forefront of discussion are:

- (1) Encouraging the relationship between the Makai and Mauka areas of Kaka'ako;
- (2) The creation of a walk-able, pedestrian-friendly community atmosphere.

Small, walk-able blocks are necessary to enable the creation of a vibrant, urban area with a sense of place. Keeping Auahi Street open will facilitate easy passage and slow traffic away from the main thoroughfares of Ala Moana Boulevard and Ward Avenue. Additionally, Auahi Street links KSBE's current land holdings and provides access to the Ward Centers area and the Ala Moana district, which have both experienced revitalization in recent years and will continue to evolve positively going forward. As nearby parcels are developed, Auahi Street will serve as an important connector in the effort to rejuvenate the Kaka'ako area and solidify the "urban village" environment created by the mix of residential, office, retail and industrial uses of the KSBE parcels.

We look forward to the evolution of the Mauka plan. If we can address other issues from a market perspective, please contact us.

Best regards,

Richard M. Gollis  
 THE CONCORD GROUP, LLC

Tim M. Cornwell

251 Kearny Street, 6<sup>th</sup> Floor San Francisco, CA 94108 Phone: 415.397.5490 Fax: 415.397.5496

HAWAII COMMUNITY  
DEVELOPMENT AUTHORITYLinda Lingle  
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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Richard M. Gollis  
 The Concord Group  
 251 Kearny Street, 6th Floor  
 San Francisco, California 94108

Dear Mr. Gollis:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We acknowledge your concerns regarding the absence of connectivity along Auahi Street between the General Growth Properties and the Kamehameha Schools properties. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS. We would also like to note that the closure of Auahi Street immediately west of Ward Avenue does not preclude mixed-use opportunities or other pedestrian-friendly improvements as part of future developments on this block.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
 Executive Director

AJHC/DN/ST:ak  
 c: EDAW, Inc.

August 18, 2008

RECEIVED  
AUG 20 2008

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Re: Comments Regarding Draft Supplemental Environmental Impact Statement /  
Proposed Revisions to Kakaako Community Development District Mauka Area Plan and Rules

Dear Ms. Tamura:

The undersigned are several similarly situated landowners located within the Kakaako Community Redevelopment District (the "*Kakaako Redevelopment District*") in the City and County of Honolulu. Our respective parcels of land will be affected by the proposed changes to the Kakaako Community Development District Mauka Area Plan and Rules (the "*Revised Mauka Area Plan and Rules*") as currently drafted and proposed by the Hawaii Community Development Authority ("*HCDA*") the environmental impact of which is supposed to be addressed in the Draft Supplemental Environmental Impact Statement ("*Draft Supplemental EIS*") which is currently pending approval by the HCDA. Each of the undersigned own parcels of land which aggregate sufficient land area that each of us would be able to apply for a planned development permit from HCDA for our respective parcels under the Mauka Area Plan and Rules. The parcels of land within the Kakaako Redevelopment District owned by the undersigned are set forth and identified on Exhibit A.

Collectively we feel that we are the "forgotten landowner group" in the ongoing discussions regarding the proposed revisions to the Mauka Area Plan and Rules. To date the discussion seems to have revolved around the concerns of the large landowners -- General Growth Properties (Victoria Ward) and Kamehameha Schools, and the small landowners -- those owning 20,000 square feet or less of real property. We feel that our previously expressed issues and concerns are not being given appropriate consideration in either the Supplemental EIS and/or the proposed changes reflected in the Revised Mauka Area Plan and Rules.

Based on our review of the Draft Supplemental EIS issued on June 25, 2008, we do not feel that the concerns and issues raised by our group in comments made to the Supplemental EIS Preparation Notice have been adequately or appropriately addressed in the Draft Supplemental EIS. For example, the proposed Draft Supplemental EIS takes the position that there are only two (2) alternatives available to HCDA -- adopt the Revised Mauka Area Plan and Rules as proposed, or reject the Revised Mauka Area Plan and Rules and maintain the current version of the Mauka Area Plan and Rules and the status quo. We believe that there are other possible and viable alternatives that the Draft Supplemental EIS should have raised, considered, and reviewed as part of the process. One such viable alternative would have been for the consultants to consider leaving most of the existing Mauka Area Plan and Rules in place and to only address specific items that are of major concern.

We also feel that another major concern with the Draft Supplemental EIS is that it fails to properly take into account or consider the potential impacts on the various proposed rule changes assuming that the currently pending Master Plan being sought by General Growth Properties is approved. The pending Master Plan covers approximately 60 acres of land in the Kakaako District and cuts a substantial swath through the portion located on the immediate mauka side of Ala Moana Boulevard between Ward Avenue

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Daniel Larson, Director  
CUNA Mutual Insurance Society  
5910 Mineral Point Road  
Madison, Wisconsin 53705

Ms. Carol Lam, Senior Vice President  
Servco Pacific Inc.  
P. O. Box 2777  
Honolulu, Hawaii 96803

Mr. Paul Kosasa  
President and Chief Executive Officer  
SMK, Inc.  
766 Pohukaina Street  
Honolulu, Hawaii 96813

Mr. Scott Whiting, President  
Waterhouse Inc.  
670 Queen Street, Suite 200  
Honolulu, Hawaii 96813

JN Group, Inc.  
2999 Nimitz Hwy  
Honolulu, Hawaii 96819

Dear Mr. Larson, Ms. Lam, Mr. Kosasa, Mr. Whiting, and JN Group, Inc.:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 18, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In 2005, the Hawaii Community Development Authority ("HCDA") embarked on a comprehensive review of the Mauka Area Plan and Rules in response to longstanding issues relating the Mauka Area Plan's urban design scheme and concern regarding the cohesiveness and livability of Kakaako's neighborhoods. All Kakaako landowners, businesses and

Ms. Susan Tamura  
Hawaii Community Development Authority  
Comments re Draft Supplemental EIS  
August 18, 2008  
Page 2 of 8

and Queen Street. The Draft Supplemental EIS simply acknowledges that General Growth Properties submitted a master plan proposal for its properties in April 2008.

We were also troubled by the fact that the response to the comments submitted on the Draft Supplemental EIS which were received by members of our group were for the most part generic in nature and failed to address in any meaningful way the concerns and issues raised with respect to the Revised Mauka Area Plan and Rules.

Absent these matters we believe the Draft Supplemental EIS should be found to be inadequate and should be deferred pending further consideration of these important matters and potential alternatives to the all or nothing scenario. We believe to act otherwise results in the ultimate decision makers in this matter – the members of the Board of HCDA – being asked to pass judgment on the Revised Mauka Area Plan and Rules without a full and complete report as to the potential negative environmental impacts and the mitigation or alternative course of actions available to address any such negative impacts, which is intended under the State's environmental laws.

As a consequence we also feel it is important to recap for you both the parcel specific and general comments regarding the factors and considerations, including potential alternatives, intended to better achieve the stated goals and rationale for proposing adoption of the Revised Mauka Area Plan and Rules.

1. Certain members of our group objected to the proposed expansion of the Civic Center neighborhood as reflected in the Revised Mauka Area Plan and Rules which would include the block bounded by Kapiolani, King and Cooke Streets. We did not find any common sense rationale for the expansion of the Civic Center neighborhood line and the resulting substantial reduction in the allowable height such a change would impose thereon. Immediately across King Street in a mauka direction from the subject block the City itself built a high rise office building which is well in excess of 65 feet. We note further that the 400 foot high Keola Lai condominium is located only one block makai of the CUNA portion of the subject block, and if you look across the street from the Servco Lexus portion of the subject block you will find several high rise office, commercial and residential condominiums which are all well in excess of 65-feet. The maps attached to the Draft Supplemental EIS appear to have corrected this discrepancy and to eliminate the proposed expansion of the Civic Center neighborhood, but those maps themselves do not constitute a revision to the Revised Mauka Area Plan and Rules. There is no specific mention in the Draft Supplemental EIS that this correction or revision is being proposed as an alternative. We wish to make sure that this correction is intended to be included in the final version of the Revised Mauka Area Plan and Rules.

2. We objected to the portion of the Revised Mauka Area Plan and Rules relating to the change in the building elements allowable on a planned development parcel. The proposed new rules are very troubling and appear to have a serious negative economic impact on all future developments on any planned development parcels located within the Kakaako Redevelopment District. While the maximum floor area ratio is intended to remain at 3.5 with a maximum tower height of 400 feet for these types of developments, the proposal replaces the existing detailed setbacks and ground level open space requirements with an allowable tower footprint of 16,000 square feet with three (3) allowable building elements described as follows:

Mr. Daniel Larson, Director  
Ms. Carol Lam, Senior Vice President  
Mr. Paul Kosasa  
Mr. Scott Whiting, President  
JN Group, Inc.  
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May 6, 2009

interested parties were invited to participate in the planning process. In total, HCDA held six public meetings, including three public presentations to the Authority. In May 2007, a Draft Mauka Area Plan was completed for public review. We offer the following in response to your comments.

- **General Comments:**

*Third Alternative Analysis.* In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. The third alternative analysis is provided in Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

*General Growth Master Plan.* The General Growth Master Plan application was submitted and approved under provisions of the existing Mauka Area Plan and Rules. The existing Mauka Area Plan and Rules were assessed in a Final and Supplemental EIS prepared in 1983 and 1985, respectively.

We believe that the Final SEIS includes full disclosure and assessment of the Draft Mauka Area Plan, including two alternatives to the proposed action. We would like to note that the Mauka Area Plan is intended to provide guidance for the long-range development of the Mauka Area. We believe we have properly assessed the relevant impacts of the proposed changes to the existing Mauka Area Plan.

Ms. Susan Tamura  
 Hawaii Community Development Authority  
 Comments re Draft Supplemental EIS  
 August 18, 2008  
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Height: Three building elements:

- *Street-front Element.* Intent is to create a consistent street wall that defines the street. Proposed maximum height limit is 65-feet.
- *Mid-height Element.* The maximum height of a development is defined by view planes from shoreline parks looking toward the Koolau mountain range. Proposed maximum height ranges from 80-215 feet.
- *Tower Element.* The intent of a tower element is to provide for taller buildings and variations in the skyline while keeping a slender building profile. Proposed maximum height is to remain at 400 feet and proposed maximum footprint is reduced from 16,000 to 9,000 square feet. Heights are proposed to be reduced in sensitive key areas.

While we understand that in the view of the planners these three (3) component building elements will address what has been perceived as shortcomings under the current Mauka Area Plan and Rules we continue to respectively disagree. We believe that the combination of the new, allowable street front element coupled with the allowable mid-height element will result in substantially more mass and bulk below 215 feet in height in exchange for a smaller tower element between the heights of 215 to 400 feet. We do not believe this proposed change is desirable. As an alternative we suggested that consideration should be given to a simpler modification to the existing Mauka Area Plan and Rules which would allow for an appropriate adjustment to permit more of a street front element within the existing platform levels (or possibly with a height increase in this element to 65 feet) with a reduced, say to 14,000 square feet, tower footprint rising above, and a possible height increase to 425 or 450 feet overall. It is our belief that such a change would result in developments which are aesthetically more appealing, without unduly adding to the lower level mass and bulk of a project, while improving view channels from both the makai and mauka directions. Furthermore such an approach would pose much less risk of severely impacting the economic viability of future redevelopment projects on the remaining larger parcels within the Kakaako Redevelopment District. This is especially the case when viewed in the context of certain other changes being proposed including the parking stall restrictions, the positional location of the tower elements, and the reserved housing requirements. We believe that when all of these factors are considered that these proposed changes will in fact adversely impact the layout, design, market unit counts, development and construction costs, and the economic feasibility of redeveloping larger land areas in the Kakaako Redevelopment District. Without an economic impact analysis as part of the Draft Supplemental EIS based on an assumed development project under these various scenarios we do not feel the Board members of HCDA will be in a position to informatively consider whether these changes will have the effect of encouraging and facilitating rational and balanced redevelopment of properties in the Kakaako Redevelopment District or rather will act as a serious disincentive to such redevelopment.

For example, we believe that it would be very instructive to have selected as an assumed development parcel of 80,000 square feet or more, one of the real and existing parcels within Kakaako and then to have done a comparison of the impacts, visual and otherwise, at differing heights of a building constructed on the assumed parcel (i) pursuant to the existing Mauka Area Plan and Rules and guidelines currently employed by HCDA staff, (ii) pursuant to the Revised Mauka Area Plan and Rules, and (iii) pursuant to one in which the podium element is increased to 65 feet, and the tower footprint is reduced to 14,000 square feet but with an overall height limitation of 450 feet.

Mr. Daniel Larson, Director  
 Ms. Carol Lam, Senior Vice President  
 Mr. Paul Kosasa  
 Mr. Scott Whiting, President  
 JN Group, Inc.  
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 May 6, 2009

• **Specific Comments:**

1. The purpose of identifying neighborhoods within the Kakaako district was to create a strong neighborhood identity that supports the viability of the larger urban district. People who live and work in neighborhoods feel a sense of belonging to the community and recognize they have a stake in maintaining it as a desirable place. The intent of the Civic Center Neighborhood was to be consistent with the City and County of Honolulu Hawaii's Capital District boundary. Chapter 206E-33(5) states the following: "Redevelopment of the district shall be compatible with plans and special districts established for the Hawaii Capital District, and other areas surrounding the Kakaako district."

As noted in your letter, the Neighborhood map was revised in the Draft SEIS to exclude the block bounded by Kapiolani Boulevard, King and Cooke Streets within the Civic Center Neighborhood.

2. Your objection to the Draft Mauka Area Plan's proposed building elements is noted. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of

Ms. Susan Tamura  
 Hawaii Community Development Authority  
 Comments re Draft Supplemental EIS  
 August 18, 2008  
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3. The Revised Mauka Area Plan and Rules propose to make parking stall areas within a project which exceed the required minimum number of parking stalls pursuant to the applicable building and zoning codes count as building floor area. This is apparently intended to discourage the private developer from building more than the minimum number of required parking stalls by creating a substantial market disincentive for a project being developed with parking in excess of the minimum code requirements. This makes no rational sense to our group. In our collective experience a private developer does not develop parking stalls in excess of the minimum code requirements without reason given the substantial per stall cost of building parking stalls. The development of additional parking stalls is a function of the competitive real estate market for market residential units. We see no rationale for HCDA through the Revised Mauka Area Plan and Rules to attempt to undermine the fair market, competitive forces within the local residential real estate market. Under the current Mauka Area Plan and Rules where parking stall areas do not count against floor area, the parking garage areas have also become a place where the developer can and does provide much needed storage areas for the purchasers of units in the building. The change in the Revised Mauka Area Plan and Rules would further discourage this highly desirable trend. Persons who relocate into the Kakaako Redevelopment District will by their location be reducing Honolulu's traffic congestion during peak traffic times without the need for this type of market disincentive.

4. The Revised Mauka Area Plan and Rules establish a preferred mauka-makai orientation for the longer faces of the tower element. This mauka-makai tower orientation has been a guideline under the current Mauka Area Plan and Rules, but has not really worked during the last 30 years. We see no reason to believe that it is likely to work any better in the future. The residents of the residential components of these towers are interested first, in makai facing views (including those with a diamond head or ewa orientation) and secondarily a mauka facing view, and not downtown Honolulu or towards Makiki. The real estate market has consistently shown and established this reality over the last 30 years in Kakaako (see Waterfront Towers, Nauru Tower, Hawaiki Tower, 1133 Waimanu, Koolani, Hokua and Keola Lai). It is not reasonable to assume that this reality will change. If imposed by an inflexible rule change it will seriously impact the future economic viability of such projects and thus redevelopment efforts in the Kakaako Redevelopment District.

5. The revisions to the reserved housing requirements contained in the Revised Mauka Area Plan and Rules do not adequately address the economic viability of enabling or incentivizing the private sector to actually be able to construct reserved housing units. The Draft Supplemental EIS lacks any substantive discussion of possible alternatives to address these issues, other than to recognize that a balancing of competing interests will be required. From the perspective of our group we feel it is critically important to analyze and consider economic viability together with the lessons taught to us by past history in Kakaako and elsewhere. If it is not economically viable to construct the reserved housing units they will not be built which defeats the purpose in the first instance of developing rules which encourage the actual construction of for sale or rental reserved housing units as opposed to the payment of cash in lieu fees by the private developer. We point out that several years ago HCDA adopted a 2-year moratorium on the reserved housing requirements in an effort to encourage and spark redevelopment activity within the Kakaako Redevelopment District. This action did not produce any surge in redevelopment activity in Kakaako even though a substantial subsidy cost for such redevelopment was temporarily avoided because general economic conditions in Hawaii's real estate market did not support any redevelopment. The Revised Mauka Area Plan and Rules should be drafted in a manner which adequately considers the economic factors and is crafted in a manner to facilitate and not dissuade a

Mr. Daniel Larson, Director  
 Ms. Carol Lam, Senior Vice President  
 Mr. Paul Kosasa  
 Mr. Scott Whiting, President  
 JN Group, Inc.  
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 May 6, 2009

accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA.

3. Your objection to the Draft Mauka Area Plan's proposal to include parking stall areas which exceed the required minimum number of parking stall to count as building floor area is noted. A key objective of the Draft Mauka Area Plan is to make Kakaako's neighborhoods and streets more pedestrian-friendly and transit-oriented. As stated in the Draft Mauka Area Plan, many Kakaako development projects provide parking well in excess of minimum requirements for market reasons. The result is massive parking structures, which are not conducive to pedestrian-friendly and active streets. For this reason, the Draft Mauka Area Plan proposes to have parking that exceeds the required minimum number of spaces count as floor area. Floor area and parking requirements will be determined through the Mauka Area Rule amendment process, pursuant to Chapter 91, Hawaii Revised Statutes.
4. Your objection to the Draft Mauka Area Plan's proposal to establish a preferred Mauka-Makai orientation for the longer faces of the tower element is noted. The third alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. As such, the third alternative analysis also proposes that the longer side of the tower be required to be orientated in the Mauka-Makai direction at a certain length to width ratio. This is to encourage point/slender towers with small footprint and narrow circumference or width in proportion

Ms. Susan Tamura  
 Hawaii Community Development Authority  
 Comments re Draft Supplemental EIS  
 August 18, 2008  
 Page 5 of 8

private sector developer from proceeding with a planned development, including the construction of reserved housing units, and should address each of the following:

a. The new rules propose a change from the current requirement of 20% of the total number of residential units in the project, to a requirement that 20% of the total residential floor area be devoted to reserved housing. This will result in a substantial increase in the costs of developing reserved housing units, not only because of increased construction costs but a proportionate increase in the per unit subsidy. We are skeptical that the increased floor area requirement for reserved housing units can be adequately offset by the proposal that the reserved housing floor area not count against the overall residential floor area allowed to the private developer, given the new limitations in tower footprint and the unchanged overall height limit of 400 feet. There is no offsetting adjustment being proposed in the determination of the price at which the reserved housing unit(s) may be sold and it remains governed by median income and allowable housing costs, not land acquisition or construction costs.

b. The new rules establish a strong preference for inclusion of the reserved housing units in the same structure and/or tower that houses the market residential units. This fails to properly account for the fact that by being in the main structure the construction costs are inevitably higher on a per square foot basis and the maintenance fees to be paid by the reserve housing unit owner are substantially higher because they are required under state law to contribute their fair share to the overall costs of maintaining and operating a much more expensive building, grounds and structure. This impacts the price at which the reserved housing unit can be sold as the estimated monthly maintenance fee is part of the required housing expense to be factored into determining the allowable sales price for the reserved housing units. The consideration of other alternatives to this approach has not been adequately reviewed and discussed, and/or rejected as unworkable.

c. The new rules propose the same 10-year buy back term as contained under existing requirements, but proposed coupling that with a perpetual equity sharing provision. It seems to us that the Draft Supplemental EIS should have considered as an alternative having the equity sharing provision end after a term of years such as 10 years, or possibly a longer term of years not to exceed 15. A perpetual restriction is in our view unduly restrictive, especially in light of the fact that the buy-back option terminates after 10-years, and that if you developed as a for rent project that no such restrictions would be applicable when the reserved housing unit is sold after the for rent term ends in 15 years. The consideration of other alternatives in the Draft Supplemental EIS remains inadequate and we believe differing options and alternatives with a less negative impact should have been reviewed, investigated and discussed.

d. No consideration has been given to the negative impact on the proposed rule changes for reserved housing development in the Kakaako Redevelopment which results from the fact that the real property in the Kakaako Redevelopment District which will be utilized for reserved housing purposes costs just as much to acquire as the market development parcels, and that the costs of construction in Hawaii are substantially higher than comparable construction costs on most of the Mainland.

e. No consideration appears to have been given to the broader history of successful as opposed to unsuccessful reserved housing requirements in the Draft Supplemental EIS. We believe that history of reserved housing requirements has demonstrated on a consistent basis that a requirement in the range of up to 20% of the total number of residential units, but allowing for reduced unit sizes,

Mr. Daniel Larson, Director  
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to length/height). In keeping with this concept, the length to width ratio are required to not exceed 4:1 for residential building and 2:1 for commercial buildings on development parcels.

The alternatives analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA.

5. Your statement that the revisions to the reserved housing requirements contained in the Draft Mauka Area Plan do not adequately address the economic viability of enabling or incentivizing the private sector to actually be able to construct reserved housing units is noted. The program for requiring reserved housing within Mauka Area projects is established in Chapter 206E-33(8), HRS. It states the following: "Residential development may require a mixture of densities, building types, and configuration in accordance with appropriate urban design guidelines; integration both vertically and horizontally of residents of varying incomes, ages and family groups; and an increased supply of housing for residents of low-or-moderate-income may be required as a condition of redevelopment in residential use..." In April 2003, the Authority directed staff to initiate a comprehensive review of the Mauka Area Plan and Rules, including a review of the reserved housing requirements and policies. Subsequently, the Authority formed a Housing Task Force ("HTF") consisting of Authority members to review the Mauka Area reserved housing rules and make recommendations for revisions and improvements of the reserved housing program. The HTF conducted a stakeholder meeting on reserved housing that included Kakaako landowners and businesses as well as

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Hawaii Community Development Authority  
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construction quality and finishes, has worked, but that any significant increase in that ratio and balance have not succeeded. We believe that there has not been an adequate explanation provided as to why a change from the existing reserved housing requirements is required given its general acceptance and proven economic viability with the Kakaako Redevelopment District over the past 25 years.

f. In our comments we suggested that a potential mitigating alternative would be development of a master plan which integrates reserved housing into the Kakaako Redevelopment District by planning for limitations within certain areas rather than forced integration into a market residential development which increases costs and other disruptions, with incentives or bonuses which could be transferable to areas in which reserved housing development is to be encouraged. In other words the blending and mixing of different housing levels should be looked at on a district wide basis, not just on a property to property basis.

From our perspective it appears that the alternative of simply tweaking or modifying specific targeted portions of the reserved housing rules under the existing Mauka Area Plan and Rules would more effectively address current concerns while still facilitating the actual development and construction of reserved housing units. Although we suggested in our comments that certain other alternatives should be reviewed, investigated, analyzed, and considered as possibly more economically viable approaches to the reserved housing rules, no such further analysis is provided in the Draft Supplemental EIS. The alternatives presented are either to adopt the Revised Mauka Area Plan and Rules or leave them as is. Absent such analysis and consideration we believe the Draft Supplemental EIS is deficient and inadequate.

We believe that all of the above support a conclusion that there must be a careful and realistic balance struck between the required contribution to gap-group reserved housing to be imposed on each development parcel and the economic viability of the same being provided by a private sector developer.

6. It does not appear to our group that the existing Mauka Area Plan and Rules need to be substantially changed. Our group believes that there now exist a substantial base line of information and real development experience with the current Mauka Area Plan and Rules to which both government and the public sector have adapted, adjusted, and accepted as reflected in the redevelopment which has actually occurred in the Kakaako Redevelopment District over the last twenty-five (25) years. While in the eyes of some it may not have progressed fast enough it has occurred and it has helped to return persons into Central Honolulu which is the first step in fostering the goal of developing a neighborhood community in which persons live, work, shop and enjoy recreational activities. We believe that one needs to first answer the question of why propose a substantial revamping of the Plan and Rules rather than proposing appropriate adjustments and modifications to what is already in place and generally accepted to foster and encourage those types of developments and activities in Kakaako which seem to be lagging behind. We believe that the Kakaako Redevelopment District does not need to go through the painful process of another lengthy and protracted learning curve regarding the interpretation and implementation of a Revised Mauka Area Plan and Rules.

\*\*\*

We understand that a principal purpose of developing the Revised Mauka Area Plan and Rules is to foster development of a "better" or "improved" mixed-use district within the Kakaako Community Development District where people can live, work, shop, and enjoy recreational activities within a neighborhood community. This is a valid and desirable purpose which our group strongly supports in

Mr. Daniel Larson, Director  
Ms. Carol Lam, Senior Vice President  
Mr. Paul Kosasa  
Mr. Scott Whiting, President  
JN Group, Inc.  
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representatives from the design and development community. Based on the results of the stakeholder meeting, proposed policies established from the IITF include:

- a. Maintain HCDA's focus on "gap group" or "workforce" housing;
- b. Retain current buy back provisions;
- c. Establish a preference for units over collection of in-lieu fees;
- d. Offer incentive bonuses on a selective basis and establish public-private joint ventures;
- e. Simplify the reserved housing rules; and
- f. Merge Mauka and Makai Area Rules as they relate to reserved housing.

Based on the recommendation of the HFT, a revised reserved housing plan was developed as part of the Draft Mauka Area Plan. The revised reserved housing program proposes that all new residential projects with the Kakaako Community Development District on lots of 20,000 square feet or more contribute to the development of reserved housing. Features of the proposed housing program include the following.

- a. A preference for reserved housing that is inclusionary.

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principle. However, in the process of formulating plans for such a desirable goal it is important that a realistic feasibility and economic review process be involved so HCDA creates a new or revised plan and set of rules which encourage (do not discourage) redevelopment activity which is workable in the real world not just in the eyes of an urban planner, or one who supports no redevelopment in the guise of better urban planning. Our group believes very strongly that while this type of review should be done that no such effort was made within the Draft Supplemental EIS to include this type of review or analysis. We believe this to be a serious flaw and that such a review process should occur before any final adoption of the Revised Mauka Area Plan and Rules. Otherwise the HCDA Board members are in our view missing a substantial and integral bit of information necessary for them to make a prudent and informed decision regarding the adoption of the Revised Mauka Area Plan and Rules, as currently proposed.

Sincerely yours,

QUNA MUTUAL INSURANCE SOCIETY

  
Its DIRECTOR

SERVCO PACIFIC INC.

Its \_\_\_\_\_

SMK, INC.

Its \_\_\_\_\_

WATERHOUSE INC.

Its \_\_\_\_\_

JN GROUP, INC.

Its \_\_\_\_\_

cc: EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
ATTN: Mr. Kevin Butterbaugh

Governor, State of Hawaii  
c/o Office of Environmental Quality Control  
235 South Beretania Street, Suite 702  
Honolulu, Hawaii 96813  
ATTN: Katherine Puana Kealoha

Mr. Daniel Larson, Director  
Ms. Carol Lam, Senior Vice President  
Mr. Paul Kosasa  
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- b. The reserved housing program will require that 20% of the residential floor area be reserved and developed for buyers or renters with qualifying incomes not more than 140% of Area Median Income.
- c. A preference for units rather than allow payment of 'in-lieu' fees.
- d. A preference for on-site reserved housing to foster mixed income communities.

We would like to note that along with the proposed changes to the reserved housing program, the HCDA also proposes the following incentives.

- a. Density or height bonus which would allow developers to build at a greater density than typically permitted.
- b. Unit size reduction and finish cost adjustment for reserved housing units.
- c. Reduced parking requirements by reducing the number or size of spaces or allowing tandem or shared parking.
- d. Design flexibility in design such as reduced setbacks or waive minimum lot size requirements.
- e. Fee waivers on a pro-rata basis for improvement district or public facilities assessment. Allow fees to

Ms. Susan Tamura  
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EXHIBIT A

(Parcels Owned in Kakaako Redevelopment District)

1. CUNA MUTUAL INSURANCE SOCIETY ("*Cuna*") who is the fee simple owner of the parcel identified as follows:  
  
 TMK No. (1) 2-1-046:002 – 600 Kapiolani Boulevard
2. SERVCO PACIFIC INC. ("*Servco*") who is the fee simple owner of several parcels identified as follows:  
 TMK No. (1) 2-1-046: 001 – 650 Kapiolani Boulevard  
 TMK No. (1) 2-1-047: 005 & 006 – 645 Kapiolani Boulevard  
 TMK No. (1) 2-1-031-030 – 609 South Street
3. SMK INC. ("*SMK*") who is the fee simple owner of several parcels identified as follows:  
 TMK No. (1) 2-1-031:001 - 601 Queen Street  
 TMK No. (1) 2-1-031:031 - 613 Queen Street  
 TMK No. (1) 2-1-031:032 - 627 Queen Street  
 TMK No. (1) 2-1-031:029 - 630 Keawe Street  
 TMK No. (1) 2-1-050:004 - 740 Halekauwila Street  
 TMK No. (1) 2-1-052:001 - 766 Pohukaina Street  
 TMK No. (1) 2-1-052:002 - 754 Pohukaina Street  
 TMK No. (1) 2-1-052:003 - 525 Ohe Lane  
 TMK No. (1) 2-1-052:004 - 526 Ohe Lane  
 TMK No. (1) 2-1-052:007 - 501 Cooke Street
4. WATERHOUSE INC. and its subsidiaries ("*Waterhouse*") who are the fee simple owner of several parcels identified as follows:  
 TMK No. (1) 2-1-048-002 – 716 Cooke Street  
 TMK No. (1) 2-1-048:005 – 700 Queen Street  
 TMK No. (1) 2-1-048:006 – 717 Emily Street  
 TMK No. (1) 2-1-048-007 – 711 Kawaiahao Street  
 TMK No. (1) 2-1-044:002 – 716 Cooke Street  
 TMK No. (1) 2-1-044:022 & 002 – 768 Kapiolani Boulevard
5. JN GROUP, INC. ("*JN*") who is the fee simple owner of several parcels identified as follows:  
 TMK No. (1) 2-1-044:001 – 736 Ward Avenue  
 TMK No. (1) 2-1-044:006 – 830 Kapiolani Boulevard  
 TMK No. (1) 2-1-044:032 – 850 Kapiolani Boulevard

Mr. Daniel Larson, Director  
 Ms. Carol Lam, Senior Vice President  
 Mr. Paul Kosasa  
 Mr. Scott Whiting, President  
 JN Group, Inc.  
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 May 6, 2009

be paid upon receipt of certificate of occupancy rather than upon application for a building permit.

- f. Fast tract permitting would streamline the permitting process for projects containing reserved housing.

Finally, we would like to note that while there is some discretion on the reserved housing policies, there are two legislative bills moving forward this legislative session that could increase the existing reserved housing requirements. Should the bills become law, the reserved housing program will be amended to reflect State law as established by the legislation.

6. Your statement that the existing Mauka Area Plan and Rules do not need to be substantially changed is noted. We agree that there exists a substantial baseline of information and redevelopment experience with the current Mauka Area Plan and Rules. As you are probably aware, recent developments have targeted the ultra-luxury segment of the condominium market. These single-loaded, glass towers have created a fortress-like environment, not conducive to a livable urban environment. For the past four years, we have been working with the Kakaako community to establish a vision that promotes positive economic development, preserves our diverse cultural heritage, and incorporates best practices in environmental sustainability including a multi-modal transportation plan. We believe by establishing appropriate urban design objectives and design standards the Kakaako District will truly be a mixed use community with a range of housing types and uses. This is the basis for the comprehensive review of the Mauka Area Plan.

Mr. Daniel Larson, Director  
Ms. Carol Lam, Senior Vice President  
Mr. Paul Kosasa  
Mr. Scott Whiting, President  
JN Group, Inc.  
Page Nine  
May 6, 2009

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
e: EDAW, Inc.

12490-10

**Data@Work**  
Real Estate Market Research

1029 Iiwi Street  
Honolulu, Hawaii  
U.S.A. 96816

(808) 291-4407  
rcassiday@mac.com  
http://www.rcassiday.com/

August 18, 2008

HCDA  
c/o Comments on Draft SEIS Mauka Plan  
677 Ala Moana Blvd  
Honolulu, Hawaii 96734

Sirs:

I have reviewed your draft Supplemental EIS and would like to raise a concern about the effect of these changes on the feasibility of earning an adequate return in investing in high-rise projects in the area.

Simply put, the reduction of building heights and shrinkage of building floor plates undermine the ability of capital partners to fund such projects. That then has the unfortunate ripple effect of taking food off the table of those of us in the development and construction industry, to say nothing of those who look to make a decent livelihood in our community. Indeed, residential development, by bringing into our city (and Kakaako in particular) the resources and the talents of both short-term visitors and long-term residents, feeds many mouths, and allows many more to enjoy a decent standard of living and a good quality of life.

Put bluntly, the area of Kakaako needs such residential projects, now more than ever - the economy is down, there is adequate capacity in the industry, and there is a growing number of unemployed. I say this as a long-time kamaaina, whose family had owned a mill in Kakaako - the mill that built the Iolani Palace and the Moana Hotel.

In my opinion, the shame of it all is that Kakaako managed to sail through the biggest boom in residential real estate history without a single project being built in it's heart. This was not for want of trying, as I worked on a number of projects in this exact area that did not go forward because the return wasn't there. Please be mindful that a balance needs to be struck between the ideal and the practical, a balance whose first purpose should be as supportive of project feasibility as possible. To that end, I hope you allow more flexibility into these regulations.

With Thanks, and Aloha

Paul Cassiday Jr.

HAWAII COMMUNITY  
DEVELOPMENT AUTHORITYLinda Lingle  
GovernorJonathan W. Y. Lai  
ChairpersonAnthony J. H. Ching  
Executive Director

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Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Paul Cassiday Jr.  
Data@Work  
1029 Iiwi Street  
Honolulu, Hawaii 96816

Dear Mr. Cassiday:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 18, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We acknowledge your concern regarding the effect of reduced building heights and shrinkage of building floor plates on the ability of capital partners to fund such projects and the ripple effect of taking food off the table of those in the development and construction industry. Provisions in the Draft Mauka Area Plan are, by no means, trying to take food off the table of those in the development and construction industry. The intent of the Mauka Area Plan is to create better communities that will enhance the quality of life for people of Hawaii. For the past four years, the Hawaii Community Development Authority ("HCDA") has been working with the Kakaako community to establish a vision that promotes positive economic development, preserves a diverse cultural heritage, and incorporates best practices in environmental sustainability. It needs to be acknowledged that not all development in Kakaako have created places that have been conducive to the environment, area businesses, residents and users of the District. A number of high-rise buildings have created a fortress-like environment, not conducive to a livable urban environment. We hope that through the Mauka Area planning process, HCDA can establish better urban design objectives and design standards to make Kakaako a desirable urban community.

Mr. Paul Cassidy Jr.  
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May 6, 2009

We would also like to note that under HCDA's regulatory guidelines, a total of 1,283 residential units were completed in 2008. Projects completed include: Moana Pacific (706 units); 909 Kapiolani Boulevard (225 units); and Keola Lai (352 units, including 63 reserved units). An additional 694 residential units are currently under construction. Since 1982, HCDA has permitted 2,089 market-priced residential units and 1,451 affordable units to be built in Kakaako.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



Integrated Solutions to Real Estate & Development

Rosalind J. Schurgin  
Executive Vice President  
Office: 310.625.9610

August 19, 2008

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AUG 22 2008

Via Email

[Susan@hcdaweb.org](mailto:Susan@hcdaweb.org)

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority (HCDA)  
c/o Comments on the Draft SEIS Mauka Plan  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

**Re: HCDA Draft Supplemental Environmental Impact Statement  
Kaka'ako Community Development District**

Dear Ms. Tamura:

This letter serves to address specific comments to some of the development requirements included in the draft Supplemental Environmental Impact Statement ("DSEIS") issued in July 2008.

Our company has been involved in urban redevelopment projects for over 25 years, including many public-private partnerships. Over this time span, the problems that both the public and private sectors have seen are almost universally acknowledged: consumption of irreplaceable resources, disinvestment and deterioration of our cities, the loss of community, and the need to adapt to the demographics of a changing society. Mass suburbanization has continued to cause deterioration of our cities. These two issues, suburbanization and deterioration of our cities are not unrelated, with macroeconomics being one of the key drivers that influence the decision of successful and sustainable development. Historically, the private and public sectors have tended to favor suburban growth, over high density development and reinvestment in our cities, due to the myriad of obstacles that affect urban redevelopment. The Festival Companies

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TEL 310-665-9000 - FAX 310-565-9009  
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Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Rosalind J. Schurgin  
Executive Vice President  
The Festival Companies  
9841 Airport Boulevard, Suite 700  
Los Angeles, California 90045

Dear Ms. Schurgin:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

- **Building Height along Ala Moana Boulevard**

1/2/4. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. In the third alternative analysis, parcels along Ala Moana Boulevard are designated as being in a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, it warrants a discretionary design review to ensure that any proposed tower elements are planned to enhance the urban design framework in the Mauka Area. The review process will study various aspects of the proposed development such as building configurations, height, orientation, and location. The guiding principles for the review process can be found in Section 3.1 of the Urban Design Analysis ("UDA"), Appendix B.

Ms. Susan Tamura, Planner, HCDA  
August 19, 2008  
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has been involved in many complex urban redevelopments and advocates urban redevelopment and the gentrification of our cities into thriving livable communities.

Our comments to the DSEIS are based upon specific elements of the Kaka'ako Community Development District development criteria recommendations that we believe should be studied further.

**The recommendation that building heights be reduced from 400 feet to 200 feet for structures fronting Ala Moana Boulevard.**

1. A decision to reduce high value density will compromise the private sector's ability to underwrite and provide community benefits, including public spaces, streetscapes, public art and other public programming.
  2. Issues related to sight lines should be addressed through strategic orientations of the buildings rather than a reduction in height, in order to provide view corridors that are within an urban environment, rather than the suburban context. The design review process can control these strategic design considerations.
  3. The higher densities will yield profits that will permit HCDA to require developers to provide reserved housing and/or reserved housing subsidies.
  4. Introduction of the "Mid-Height Element" with maximum heights ranging up to 215 feet, combined with the reduction in tower height along the Ala Moana frontage will force more mid-level building envelopes and mid-level massing, that may work against the intent of preserving mauka-makai views at pedestrian level. The higher, slender high-rise towers provide for higher level of design, while preserving view corridors at both pedestrian and above grade view planes.
- **The recommendation that building floor plates for structures over 200feet be reduced from 16,000 square feet to 9,000 square feet.**
    1. This reduction will impact economic feasibility. We suggest that HCDA study this reduction further and the potential long term negative economic impacts resulting from said 44% reduction in floor plate area.
    2. The reduction in floor plate area and overall height will result in substantially fewer units being developed at a much higher price per square foot, resulting in only the more affluent purchaser being able to occupy Kaka'ako towers.
    3. The reduction in floor plates probably eliminates the mixed use component or potential office development within the District.



Ms. Rosalind J. Schurgin  
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3. The provision of reserved housing is a requirement of any planned development permit. "Profits" do not factor into the requirement of providing reserved housing units.

- **Building Tower Footprint Size**

- 1/2/3. The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS. The alternatives analysis is also included in the UDA, Appendix B of the Final SEIS.

- **Absence of Auahi Street Connectivity**

- 1 & 2. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the adjacent Civic District. For traffic circulation purposes, Pohukaina-Auahi Street better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools properties. Assessment on the traffic analysis for the roadway plan can be found in Section 3.7 of the Final SEIS.

- **Street Front Element**

1. Your recommendation that the Street-front Element minimum height should not be fixed at the greater of 40 feet or four stories is noted. The third alternative

Ms. Susan Tamura, Planner, HCDA  
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Page 3

• **Absence of Auahi Street connectivity.**

1. Auahi Street were to be opened at Kamani Street, it might lessen the area wide traffic impact concerns addressed in the SEIS. This should be studied further.
2. A more uniform network of streets is safer and more empowering for those without a car. It also activates the street level with mixed use opportunities of retail and other uses.

• **The recommendation that street front elements have a minimum height of 40 feet or four stories.**

1. This criteria is too restrictive and will inhibit design creativity. Some variations will increase visual and functional use and integration of public and private spaces.

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

Sincerely yours,

**THE FESTIVAL COMPANIES**



Rosalind J. Schurgin  
Executive Vice President

RJS:ym



Ms. Rosalind J. Schurgin  
Page Three  
May 6, 2009

analysis proposes a Street-front Element range of 40 feet to 65 feet to maintain pedestrian-scaled developments. Urban Design analysis on structure heights for all three alternatives can be found in Section 3.10 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

**FORESTCITY**

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AUG 22 2008

August 18, 2008  
Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Re: Kaka'ako Community Development District Draft Supplemental Environmental Impact Statement

Dear Ms. Tamura:

Thank you for the opportunity to review and comment on the Kaka'ako Community Development District Draft Supplemental Environmental Impact Statement (DSEIS) for the Hawaii Community Development Authority's (HCDA's) Draft Mauka Area Plan dated July 2008.

Forest City Enterprises, Inc. is a large publicly traded real estate company engaged in the acquisition, development, ownership and management of commercial and residential real estate throughout the United States. We have become an active contributor to the Hawaii economy with our involvement with the construction and management over 6,500 military housing units and have the intention of expanding our activity with an emphasis on providing badly needed rental and affordable housing in Hawaii. We also intend to develop supporting commercial to serve the needs of the local residents for these projects and look forward to an enduring presence in the islands. Towards this end, we are exploring potential developments in the Kaka'ako and therefore, the subject DSEIS is of great interest to us.

We understand and appreciate the urban design principles put forth by the DSEIS and HCDA's overall goal of creating a pedestrian-oriented, multi-modal community in the Kaka'ako Mauka Area.

At the same time, we have two areas of concern in the DSEIS: the reduction in building heights along Ala Moana Boulevard from 400 to 200 feet and the reduction in building floor plates from 16,000 to 9,000 square feet for structures over 200 feet. Both of these changes will drive development costs higher and make the financial feasibility of projects harder to achieve. The result may be a variety of unintended consequences. For example, reducing the maximum building floor plates will increase the per square foot construction costs for mid and high-rise residential towers making it even more difficult to provide rental and for-sale product intended for Hawaii residents. This will also further compromise the ability of developers to provide the required reserved housing, rendering projects economically impossible.



HAWAII COMMUNITY DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Brian Jones  
Chairman & Chief Executive Officer  
Forest City Commercial Development  
949 South Hope Street  
Los Angeles, California 90015

Mr. Jon Wallenstrom  
Chief Operating Officer/Senior Vice President  
Forest City Enterprises, Inc., Hawaii  
949 South Hope Street  
Los Angeles, California 90015

Dear Messrs. Jones and Wallenstrom:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 18, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We acknowledge your concerns regarding the reduction in building heights along Ala Moana Boulevard from 400 to 200 feet and the reduction in building floor plates from 16,000 to 9,000 square feet for structures over 200 feet. As stated in your comments, recent developments have targeted the ultra-luxury segment of the condominium market. These single-loaded, glass towers have created a fortress-like environment, not conducive to a livable urban environment. For the past four years, the Hawaii Community Development Authority has been working with the Kakaako community to establish a vision that promotes positive economic development, preserves our diverse cultural heritage, and incorporates best practices in environmental sustainability. We believe that by establishing appropriate urban design objectives and design standards, the Kakaako District will truly be a mixed use community with a range of housing types and uses.

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on

Ms. Susan Tamura  
August 18, 2008  
Page 2

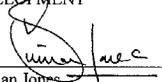
Kaka'ako presents an opportunity to move Hawaii residents back into the urban core. Recent developments have largely targeted the ultra-luxury segment of the condominium market, and the proposed rules will further exacerbate this trend. We don't believe it is the intent of HCDA to turning Ala Moana Boulevard into the Park Avenue of Honolulu.

Development in the Mauka Area of Kaka'ako can make a large contribution to badly needed housing inventory targeted for the permanent residential workforce in Hawaii, and we feel the DSEIS does not sufficiently assess the economic impact of these changes. We strongly urge HCDA to fully analyze these impacts in the Final Supplemental Environmental Impact Statement.

Thank you for the opportunity to comment on these important plans.

Sincerely,

FOREST CITY COMMERCIAL  
DEVELOPMENT

By   
Brian Jones  
Chairman & CEO, Commercial  
Development, West Coast Region

By   
Jon Wallenstrom  
COO/Senior Vice President,  
Forest City Enterprises, Inc., Hawaii

cc: EDAW Inc. (Mr. Kevin Butterbaugh)  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Office of Environmental Quality Control

Mr. Brian Jones  
Mr. Jon Wallenstrom  
Page Two  
May 6, 2009

urban form and design. In the third alternative, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area. The third alternative proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.
- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Chapter 3.10 of the Final SEIS and in Appendix B, Urban Design Analysis.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



Dale A. Henn  
Vice President, Capital Appropriations & Facilities

RECEIVED  
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HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

Gannett Co., Inc.  
7950 Jones Branch Drive  
McLean, VA 22107-0830

Office: 703-854-5928  
Fax: 703-854-2042  
dhenn@gannett.com

August 22, 2008

RECEIVED  
AUG 22 2008

Mr. Anthony J. H. Ching  
Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Re: Letter of Joinder to Comments Regarding Draft Supplemental Environmental Impact Statement/Proposed Revisions to Kakaako Community Development District Mauka Area Plan and Rules (the "Revised Mauka Area Plan and Rules")

Dear Mr. Ching:

I hereby verify that Gannett Co., Inc. owns the property at 605 Kapiolani Boulevard, Honolulu, HI 96813 that will be affected by the above-referenced Revised Mauka Area Plan and Rules which includes:

1. TMK No. (1) 2-1-047:003, located on the corner of Kawaiahao Street and South Street; and
2. TMK No. (1) 2-1-047:004, located on the corner of South Street and Kapiolani Boulevard.

**JOINDER**

Gannett Co., Inc. joins in the Comments submitted by letters of August 18, 2008 to the Hawaii Community Development Authority on behalf of CUNA MUTUAL INSURANCE SOCIETY, SERVCO PACIFIC, INC., SMK, INCK, WATERHOUSE, INC. AND JN GROUP, INC.

Respectfully submitted,

By:

Dale A. Henn  
VP, Capital Appropriations and Facilities  
Gannett Co., Inc.

cc: Susan Tamura, HCDA  
Kevin Butterbaugh, EDAW, Inc.  
Katherine P. Kealuha, OEQC  
Carol Lam, SERVCO

80719



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Jonathan W. Y. Lai  
Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Dale Henn, Vice President  
Gannett Co., Inc.  
7950 Jones Branch Drive  
McLean, Virginia 22107-0830

Dear Mr. Henn:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 18, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In 2005, the Hawaii Community Development Authority ("HCDA") embarked on a comprehensive review of the Mauka Area Plan and Rules in response to longstanding issues relating to the Mauka Area Plan's urban design scheme and concern regarding the cohesiveness and livability of Kakaako's neighborhoods. All Kakaako landowners, businesses and interested parties were invited to participate in the planning process. In total, HCDA held six public meetings, including three public presentations to the Authority. In May 2007, a Draft Mauka Area Plan was completed for public review. We offer the following in response to your comments.

• **General Comments**

*Third Alternative Analysis.* In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. The third alternative analysis is provided in Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

*General Growth Master Plan.* The General Growth Master Plan application was submitted and approved under provisions of the existing Mauka Area Plan and Rules. The existing

Mr. Dale Henn, Vice President  
Page Two  
May 6, 2009

Mauka Area Plan and Rules were assessed in a Final and Supplemental EIS prepared in 1983 and 1985, respectively.

We believe that the Final SEIS includes full disclosure and assessment of the Draft Mauka Area Plan, including two alternatives to the proposed action. We would like to note that the Mauka Area Plan is intended to provide guidance for the long-range development of the Mauka Area. We believe we have properly assessed the relevant impacts of the proposed changes to the existing Mauka Area Plan.

- **Specific Comments**

1. The purpose of identifying neighborhoods within the Kakaako district was to create a strong neighborhood identity that supports the viability of the larger urban district. People who live and work in neighborhoods feel a sense of belonging to the community and recognize they have a stake in maintaining it as a desirable place. The intent of the Civic Center Neighborhood was to be consistent with the City and County of Honolulu Hawaii's Capital District boundary. Chapter 206E -33(5) states the following: "Redevelopment of the district shall be compatible with plans and special districts established for the Hawaii Capital District, and other areas surrounding the Kakaako district."

As noted in your letter, the Neighborhood map was revised in the Draft SEIS to exclude the block bounded by Kapiolani Boulevard, King and Cooke Streets within the Civic Center Neighborhood.

2. Your objection to the Draft Mauka Area Plan's proposed building elements is noted. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third

Mr. Dale Henn, Vice President  
Page Three  
May 6, 2009

alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA.

3. Your objection to the Draft Mauka Area Plan's proposal to include parking stall areas which exceed the required minimum number of parking stall to count as building floor area is noted. A key objective of the Draft Mauka Area Plan is to make Kakaako's neighborhoods and streets more pedestrian-friendly and transit-oriented. As stated in the Draft Mauka Area Plan, many Kakaako development projects provide parking well in excess of minimum requirements for market reasons. The result is massive parking structures, which are not conducive to pedestrian-friendly and active streets. For this reason, the Draft Mauka Area Plan proposes to have parking that exceeds the required minimum number of spaces count as floor area. Floor area and parking requirements will be determined through the Mauka Area Rule amendment process, pursuant to Chapter 91, Hawaii Revised Statutes.
4. Your objection to the Draft Mauka Area Plan's proposal to establish a preferred Mauka-Makai orientation for the longer faces of the tower element is noted. The third alternative analysis contains provisions to accommodate development potential of the Mauka Area properties while minimizing the resultant visual impacts on the community. As such, the third alternative analysis also proposes that the longer side of the tower be required to be orientated in

Mr. Dale Henn, Vice President  
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May 6, 2009

the Mauka-Makai direction at a certain length to width ratio. This is to encourage point/slender towers with small footprint and narrow circumference or width in proportion to length/height). In keeping with this concept, the length to width ratio are required to not exceed 4:1 for residential building and 2:1 for commercial buildings on development parcels.

The alternatives analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA.

5. Your statement that the revisions to the reserved housing requirements contained in the Draft Mauka Area Plan do not adequately address the economic viability of enabling or incentivizing the private sector to actually be able to construct reserved housing units is noted. The program for requiring reserved housing within Mauka Area projects is established in Chapter 206E-33(8), HRS. It states the following: "Residential development may require a mixture of densities, building types, and configuration in accordance with appropriate urban design guidelines; integration both vertically and horizontally of residents of varying incomes, ages and family groups; and an increased supply of housing for residents of low-or-moderate-income may be required as a condition of redevelopment in residential use..." In April 2003, the Authority directed staff to initiate a comprehensive review of the Mauka Area Plan and Rules, including a review of the reserved housing requirements and policies. Subsequently, the Authority formed a Housing Task Force ("HTF") consisting of Authority members to review the Mauka Area reserved housing rules and make recommendations for revisions and improvements of the reserved housing program. The HTF conducted a stakeholder meeting on reserved housing that included Kakaako landowners and businesses as well as representatives from the design and development

Mr. Dale Henn, Vice President  
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May 6, 2009

community. Based on the results of the stakeholder meeting, proposed policies established from the HTF include:

- a. Maintain HCDA's focus on "gap group" or "workforce" housing;
- b. Retain current buy back provisions;
- c. Establish a preference for units over collection of in-lieu fees;
- d. Offer incentive bonuses on a selective basis and establish public-private joint ventures;
- e. Simplify the reserved housing rules; and
- f. Merge Mauka and Makai Area Rules as they relate to reserved housing.

Based on the recommendation of the HFT, a revised reserved housing plan was developed as part of the Draft Mauka Area Plan. The revised reserved housing program proposes that all new residential projects with the Kakaako Community Development District on lots of 20,000 square feet or more contribute to the development of reserved housing. Features of the proposed housing program include the following.

- a. A preference for reserved housing that is inclusionary.
- b. The reserved housing program will require that 20% of the residential floor area be reserved and developed for buyers or renters with qualifying incomes not more than 140% of Area Median Income.

Mr. Dale Henn, Vice President  
Page Six  
May 6, 2009

- c. A preference for units rather than allow payment of 'in-lieu' fees.
- d. A preference for on-site reserved housing to foster mixed income communities.

We would like to note that along with the proposed changes to the reserved housing program, the HCDA also proposes the following incentives.

- a. Density or height bonus which would allow developers to build at a greater density than typically permitted.
- b. Unit size reduction and finish cost adjustment for reserved housing units.
- c. Reduced parking requirements by reducing the number or size of spaces or allowing tandem or shared parking.
- d. Design flexibility in design such as reduced setbacks or waive minimum lot size requirements.
- e. Fee waivers on a pro-rata basis for improvement district or public facilities assessment. Allow fees to be paid upon receipt of certificate of occupancy rather than upon application for a building permit.
- f. Fast tract permitting would streamline the permitting process for projects containing reserved housing.

Finally, we would like to note that while there is some discretion on the reserved housing policies, there are two legislative bills moving forward this legislative session that could increase the existing reserved housing requirements. Should the bills become law; the reserved

Mr. Dale Henn, Vice President  
Page Seven  
May 6, 2009

housing program will be amended to reflect State law as established by the legislation.

6. Your statement that the existing Mauka Area Plan and Rules do not need to be substantially changed is noted. We agree that there exists a substantial baseline of information and redevelopment experience with the current Mauka Area Plan and Rules. As you are probably aware, recent developments have targeted the ultra-luxury segment of the condominium market. These single-loaded, glass towers have created a fortress-like environment, not conducive to a livable urban environment. For the past four years, we have been working with the Kakaako community to establish a vision that promotes positive economic development, preserves our diverse cultural heritage, and incorporates best practices in environmental sustainability including a multi-modal transportation plan. We believe by establishing appropriate urban design objectives and design standards the Kakaako District will truly be a mixed use community with a range of housing types and uses. This is the basis for the comprehensive review of the Mauka Area Plan.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Cling  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

 General Growth Properties, Inc.

August 21, 2008

BY FACSIMILE AND MAIL

EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawai'i 96813  
Attention: Mr. Kevin Butterbaugh

Hawai'i Community Development Authority  
677 Ala Moana Blvd., Suite 1001  
Honolulu, Hawai'i 96813  
Attention: Ms. Susan Tamura

Dear Mr. Butterbaugh and Ms. Tamura:

Re: Draft Supplemental Environmental Impact Statement – Proposed Revisions to the Kaka'ako Mauka Area Plan and Rules

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed revisions to the Kaka'ako Mauka Area Plan and Rules.

We have attached a summary of our comments on the DSEIS.

Please feel free to call me at 947-3788 x 206 if you have any questions.

Sincerely,



Jan Yokota  
Vice President of Development – Hawai'i Region

Enclosure

Limited Partnership  
1441 Kapiolani Blvd., Ste 202  
Honolulu, Hawaii 96814  
**Development Design  
& Construction**  
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Ref. No.: PL EIS 6.26

August 14, 2008

Ms. Jan Yokota  
Vice President of Development  
General Growth Properties, Inc.  
1441 Kapiolani Boulevard, Suite 202  
Honolulu, Hawaii 96814

Dear Ms. Yokota:

Re: Draft Supplemental Environmental Impact Statement ("SEIS") for the Revisions to the Mauka Area Plan

Thank you for your letter dated August 1, 2008, requesting additional information on the subject Draft SEIS. We offer the following responses in the respective order of your questions.

1. Information on land use assumptions by Traffic Analysis Zones ("TAZ") used in the Transportation Analysis may be found in Appendix A of the Draft SEIS – Volume II, pages 227-236 for the No Action Alternative and pages 237-246 for the Preferred Alternative. The Transportation Analysis used trip generation categories found in the ITE Trip Generation Manual, 7<sup>th</sup> Edition and were used as follows:

Residential:	LU 230 (Residential Condominium/Townhouse);
Retail:	LU 814 (Specialty Retail Center) for daily and PM; For AM, taken as the ratio of AM to PM average rates for LU 820 (Shopping Center), multiplied by the PM total using LU 814;
Office:	LU 710 (General Office Building); and
Industrial:	LU 110 (General Light Industrial).

In general, TAZ centroid connectors were modeled using "mid-block loading" with connections to adjacent roadways, except arterial roadways with high traffic volumes. The Transportation Analysis implicitly assumes no connections from any developments to Kapiolani Boulevard, Ala Moana Boulevard, and Piikoi Street. See attached figure for locations of centroid connectors by TAZ.

2162

HCDA Draft SEIS Comments

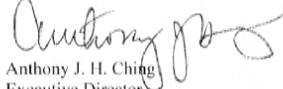
DSEIS Volume	Page No.	Comment
2.4.2 - Development Provisions	2-6	Building Height provisions for "Street-Front Element" - Although it is stated that the intent of this provision is to define a consistent street wall, it is not clear whether the current 1:1 slope from 20' to 45' will still be required. Elimination of this setback will contribute towards achieving a consistent street wall.
2.4.2 - Development Provisions	2-7	<p>"Tower Element":</p> <p><b>Maximum footprint</b> - The proposed maximum footprint of 9,000 sf, which reflects a 44% reduction in allowable floor plate size, is inefficient from a construction perspective and will result in a higher construction cost per square foot. In addition, a smaller footprint will necessitate the construction of taller buildings in order to provide the same FAR. In order to achieve a 3.5 FAR, with a reduction in the allowable building footprints from 16,000 sf to 9,000 sf, taller buildings and/or additional towers would be required.</p> <p><b>Maximum height</b> - Reducing the heights along Ala Moana Boulevard to 200' and 100', together with the reduction in building footprint, increases the difficulty of achieving the permitted density (3.5 FAR), which could potentially result in economic hardship. To achieve the maximum permitted density, a wall of 100' and 200' buildings may be required. This would run counter to the interest in preserving mauka-makai views. A better solution would be the design strategies proposed on page 3-57 of the DSEIS that would orient the buildings along Ala Moana Boulevard in a mauka-makai configuration to allow some views to be maintained and that would allow visual and physical connections to penetrate the required massing.</p> <p><b>Mauka-makai orientation</b> - We support the proposed mauka-makai tower orientation. However, on the parcels facing Ala Moana Boulevard, this orientation and the proposed length-to-width tower footprint ratio may not be achievable given current tower setback requirements.</p> <p>We request an opportunity to review any architectural models or analyses prepared to verify that the permitted FAR can be maintained with the proposed height and footprint reductions.</p>
2.5.1 - Parks and Open Space: Strategies for Meeting the Project Need	2-8 (Fig. 2-3)	<p>Ward Avenue is shown in the "Open Space Network" as a "tree-lined low speed avenue." The Draft Mauka Area Plan calls for a reduction of lane widths and wider sidewalks on Ward Avenue, but no bike lane is shown. We feel that bicycle lanes on Ward would greatly enhance mauka-makai bike transportation options and would allow for a safe bike connection to Kewalo Basin and Ala Moana Park.</p> <p>If it is intended that Ward Avenue and other streets include bike lanes, this should be shown on Figure 2-3.</p> <p>Please note that the Ward Neighborhood Plan proposes additional bicycle routes in addition to those assumed in the DSEIS. The Ward Neighborhood Plan proposes an off-path bicycle path on Ala Moana Boulevard, a new bicycle route along Auahi Street, and new bicycle lanes on Kamake'e and Pohukaina Streets and Ward Avenue.</p>
	2-9	It is noted that several locations are suggested for new parks. One of these is at Ward Avenue and Auahi Street. However, Figure 2-3 indicates a proposed park near Ward and Kamake'e. Which is the suggested location? It is unclear why a location near Ward and Kamake'e is proposed as a park location. Please explain.

Ms. Jan Yokota  
Page Two  
August 14, 2008

2. Parking garage locations are assumed to coincide with access points, or locations of centroid connectors for each TAZ.
3. The Transportation Analysis analyzed 33 intersections along major roadways within the Mauka Area. It was determined that the greatest impact to traffic circulation would be along the major roadways servicing the Mauka Area. Traffic turning movement volumes for intersections along minor roadways were not analyzed as part of the Transportation Analysis.

Thank you for your interest in the environmental review process.

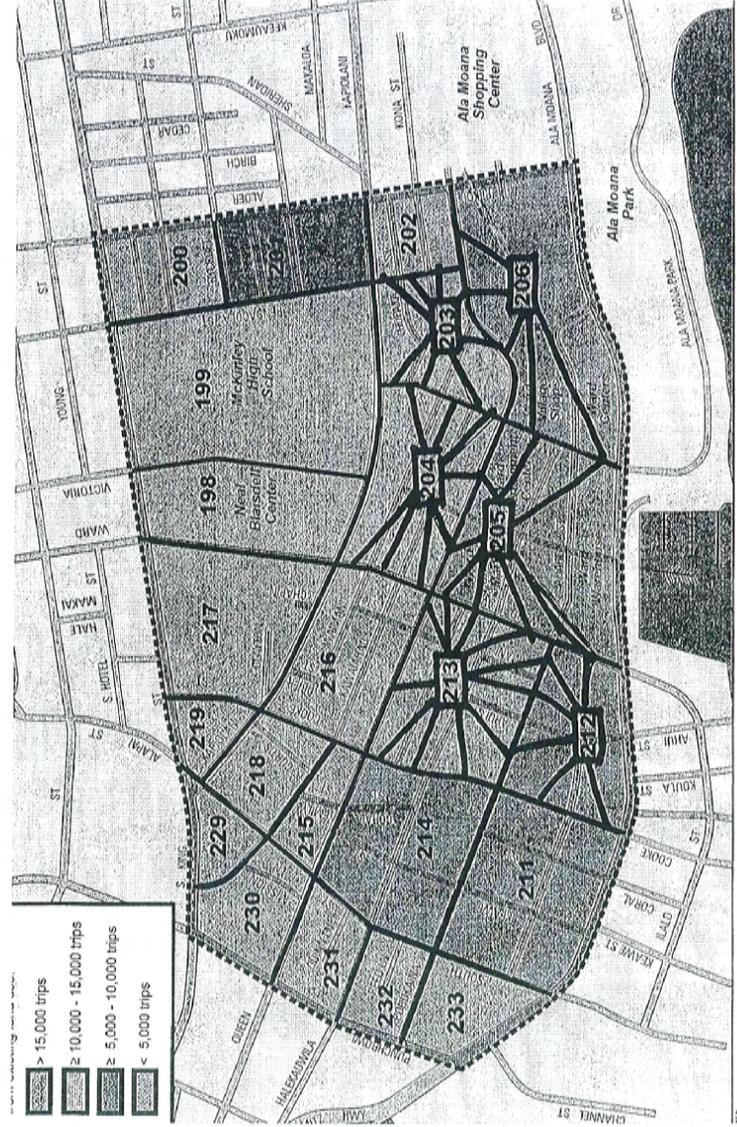
Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:II  
Attachment

HCDRA Draft SEIS Comments

2.5.2 - Views and View Corridors	2-10 and 2-11 (Fig. 2-4)	This section states that: "The view cones represent an attenuated view that remains across areas of Mauka area where taller buildings are either absent or placed far enough from the shorelines that their visibility recedes and their perceived height diminishes in relation to the mountain backdrop." The attenuated cones refer to the existing conditions. To address concerns relating to preserving mauka-makai views, the buildings on Ala Moana Boulevard in the Ward Master Plan were rotated to present the narrowest profile to the mauka-makai axis. We would appreciate the opportunity to review the Urban Design Analysis mentioned in this section.
2.6.1 - Roadway Network Changes	2-12 (Fig. 2-5)	This graphic identifies "promenade" streets. The roadway cross sections presented in Figures 2-6 and 2-7, however, do not seem to indicate differences between "promenade" streets and the other streets. For example, the sidewalk width within the right-of-way is 8 feet on Pi'iko'i Street, which is the same as Cooke Street, which is proposed as a "promenade" street.
	2-12 (Fig. 2-5), 2-13	<b>Cummins Street Extension</b> - The DSEIS shows Cummins Street extending from Waimanu Street to Ala Moana Boulevard, thus allowing traffic through a critical primarily pedestrian oriented public plaza within the Ward Neighborhood Plan from Waimanu Street. There appears to be no justification within the DSEIS, from a traffic perspective, for this extension of Cummins Street. This extension would bisect a major block within the Ward Neighborhood Plan and would make it impossible to construct the Central Plaza that is currently envisioned. Please provide traffic or other analyses to support the extension of Cummins Street from Waimanu Street to Ala Moana Boulevard.
	2-12 (Fig. 2-5), 2-13	<b>Halekauwila Street from Ward to Kamake'e</b> - Halekauwila Street is shown on Figure 2-5 as connecting through a major block in the Ward Neighborhood Plan to Kamake'e Street. The Ward Neighborhood Plan shows a variation of this street, with Halekauwila Street terminating at Ward Avenue. The proposed new street in the Ward Neighborhood Plan provides connectivity between Kamake'e Street and Ward Avenue.
	2-13	The following statement is confusing: "Remove on-street parking on Ward Avenue and Auahi Street between Queen Street and Auahi Street and install a planted median." Does this refer to Ward Avenue between Queen and Auahi Street, as well as Auahi Street generally? Please clarify.  In any case, however, it is important to allow on-street parking on Ward Avenue to maintain viable retail storefronts along Ward and to enhance the streetscape experience. Perhaps on-street parking could be removed during peak periods of demand to address traffic concerns.
2.7.1 - Inclusionary Housing	2-19	While we acknowledge the preference for providing reserved housing units on a project site, allowing units to be provided off-site, but within Kaka'ako, may increase the economic viability of building the reserved housing units.
2.12.4 - Cost Estimates	2-31	On the Table 2-9, labeled "Traffic Signalization Improvement Costs", should the intersection identified be "Kamake'e/Queen Streets" rather than "Kamani/Queen Streets"?
3.4.1 - Affected Environment (Flood and Tsunami)	3-5 to -8	In the discussion on flood zones, it is noted that Zone A is an area where the flood elevations are undetermined. However there is no discussion as to why the existing buildings are elevated relative to the street levels, except for a comment on pages 3-40 through 41 that "...the new developments in the Mauka Area...create a visual disconnect at the pedestrian level."



see: OIMPO, 2003

PREFERRED ALTERNATIVE TRAFFIC ANALYSIS ZONE (TAZ) MAP  
Figure 34

HCDA Draft SEIS Comments

		<p>In the appendix, a letter from the State Department of Land and Natural Resources notes the flood zone and the response given was that the project would comply, yet information on how compliance will be achieved is not discussed in the DSEIS. A flood elevation determination could be obtained from the Corps of Engineers for various locations in the Mauka Area. With such determinations, the general implications for the street-pedestrian-building connections could be identified and appropriately discussed in section 3.4.2.</p> <p>In addition, with the known change in the FIRM (FEMA held informational meetings in Kaka'ako recently), the flood zone limits should be cited as an "Unresolved Issues" in section 5.4.2, page 5-5. Based on discussions with the City Department of Planning and Permitting, the draft FIRM panels are due in December 2008 with the final panels expected in September to December 2009.</p> <p>A related implication of building within the flood zone that is not recognized in the DSEIS is the need for flood insurance. At present, any building with an elevator pit serving residential units needs to have the bottom of the pit at or above the base flood elevation (BFE); if not, then flood insurance is required. It is possible that a mixed-use development with no residential units on the ground floor will be released from the insurance requirement associated with the elevator pit if the ground level is at or above the BFE, but the determination has yet to be made by FEMA. Until FEMA makes a favorable determination regarding the elevator pits, essentially all new buildings will require flood insurance. The insurance will need to cover the replacement cost of the structure. The annual premiums are capped at \$500,000 by federal law at this time, with current premiums in the upper \$400,000s.</p> <p>With the proposed reduction in footprint, restriction in height and narrower configuration of residential towers resulting in fewer units, there will be fewer individuals sharing the cost of the insurance premium.</p>
3.7.1 - Affected Environment (Traffic)	3-30	We will need to understand how these bicycle lanes are integrated with cars and the impact on street cross sections. Please clarify.
3.10.2 - Potential Impacts and Mitigation Measures	3-57	In the section titled "Urban Form", it is noted that: "The blocks along Ala Moana average 250- to 275-feet deep. The relatively shallow lot size is more conducive to medium-scale development." We disagree with this statement and have worked with our design firms on building concepts for slender high rises oriented in the mauka-makai direction.
		In the same section, the following statement is made: "By employing a lower tower-element height restriction and encouraging mid-rise development, the Draft Mauka Area Plan allows the future development to achieve maximum FAR without the presence of 400-foot towers." Was an architectural analysis done to support the statement that maximum FAR can still be achieved? If so, please provide this analysis. In addition, we note that buildings on Ala Moana Boulevard can be designed, with appropriate modifications to the current Mauka Area Plan, as slender towers with mauka-makai orientations. The Mid-Height Element and taller podiums are concepts that are included in the Ward Neighborhood Plan.
		The following is also noted in this section: "Construction of 400-foot towers, as allowed in the existing Mauka Area Plan, could be feasible with parcel consolidation and block reconfiguration. In that scenario, the suggested development strategy would be to break up the 'superblocks' into smaller linear lengths at a pedestrian level to allow visual and physical connections penetrating the required massing. Another design strategy would be to orient the building in a Mauka-Makai configuration to allow some views to be maintained." Please note that the Ward Neighborhood Plan proposes both strategies.



HAWAII COMMUNITY DEVELOPMENT AUTHORITY



Linda Ingle  
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Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Jan Yokota  
Vice President of Development – Hawai'i Region  
General Growth Properties, Inc  
1441 Kapiolani Boulevard, Suite 202  
Honolulu, Hawaii 96814

Dear Ms. Yokota:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

2.4.2 Development Provisions:

- 2-6. The setback requirement of 1:1 slope from 20 - 40 feet for view corridor streets in the existing Mauka Area Rules will not be required under the proposed street front element.
- 2-7 We acknowledge your comment that the proposed maximum 9,000 square foot print is inefficient from a construction perspective and will result in higher construction costs per square foot. Your comment that the reducing the heights along Ala Moana Boulevard to 200' and 100' increases the difficulty of achieving the permitted density is also noted.

Our analysis has shown that the floor area ratio ("FAR") can be maintained with the proposed height and footprint reductions because some of the square footage requirement will be covered in the street front element and its maximum coverage of the site, allowing a reduced tower footprint. A greater amount

HCDRA Draft SEIS Comments

3.11.2 - Potential Impacts and Mitigation Measures	3-63	<p>This section refers to the impact of the implementation of the Draft Mauka Area Plan on large landowners. It notes that it would restrict the ability to construct massive tower elements due to the floor plate reduction and the changed floor plate to accommodate mauka-makai views. It also notes that the proposed Mid-Height Element atop the Street-Front Element would accommodate an even greater amount of floor area.</p> <p>Was an architectural analysis prepared to support the statement that a greater amount of floor area can be accommodated with the proposed height and footprint reductions in the Draft Mauka Area Plan? If so, please provide a copy of this analysis.</p>
3.13 - Public Services and Facilities	3-100 (Fig. 3-25)	The alignments shown in Figure 3-25 for the Queen Lane connection to Queen Street and the intersection of Ward Avenue with the realigned Auahi Street should match the alignments shown in the Transportation Analysis in the appendix.
5.1 - Relationship between Local Short-Term Uses of the Environment and the Maintenance of Long-Term Productivity	5-1	In this section, the following statement is made: "In the event structures are built to maximum allowable heights, the existing Mauka views of the Ko'olau Range may be eroded...in the event structures are built to the maximum allowable heights. The effect of adhering to development guidelines under the existing Mauka Area Plan has the effect of nearly eliminating Mauka views of the Ko'olau Range." We disagree. With modifications to the Mauka Area Plan that would allow buildings along Ala Moana Boulevard to be designed as slender buildings in a mauka-makai orientation, towers can be built to maximum allowable heights without the impacts suggested.
5.2.2 - Impacts on the Human Environment	5-3	The following statements are made in this section: "The build-out of the Mauka Area under the Draft Mauka Area Plan will result in the impairment of the existing Mauka view of the Ko'olau Range. The implementation of the No-Action Alternative would result in near obstruction of this view. KS and GGP development projects would yield similar results since both are within the Mauka Area." We note that, with appropriate design and orientation of buildings, mauka-makai views can be preserved.
5.4 - Probable Adverse Environmental Effects that Cannot be Avoided	5-4	The statement is made in this section that: "The build-out of the Mauka Area under the Draft Mauka Area Plan would have less impact on the Mauka view of the Ko'olau Range than under the No-Action Alternative, which permits building footprints to be built up to 16,000 square feet, resulting in bulkier and more massive structures." We disagree with this statement. The maximum footprint of 9,000 sf proposed in the DSEIS will necessitate the construction of taller buildings and/or additional towers in order to provide the same FAR. Buildings can be designed with a larger footprint that are slender and oriented in the mauka-makai direction to minimize impact to view planes.
<b>DSEIS - Volume II</b>		
Transportation Analysis (Appendix A)	Comments on Methodology	1. With the OMPO model used as the basis for some future assumptions, the future traffic volumes appear to be generated without directly applying a travel demand model. Simply adding cumulative traffic volumes associated with the alternatives to estimated future background traffic volumes at specific locations will not capture any regional shifts in travel behavior. Any regional benefits, for example, improved jobs-housing balance in central Honolulu, are therefore not accounted for in the analysis.

Ms. Jan Yokota  
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of floor area can be accommodated by including a mid-height element.

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address issues related to urban form and design. The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development.

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to

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		<p>2. In calculating cumulative traffic volumes for both alternatives, it is not apparent if reductions in traffic were taken into account for existing uses that are assumed to be redeveloped with build-out of the Mauka Area Plan. It is not clear if the cumulative traffic volumes for the No-Action Alternative and the Preferred Alternative account are net of future uses less existing uses.</p> <p>3. HCDA's letter to General Growth Properties dated August 14, 2008 indicates the ITE Land Use Code 230 was used for residential land uses. This may overestimate trip generation for high-density, high rise residential uses.</p> <p>4. It is noted that the future mode split was derived from OMPO model projections and when compared to existing conditions include a small shift from auto to alternative modes. As noted in the Transportation Analysis, the future mode split was thus conservatively estimated. Considering that build-out of the Mauka Area Plan would dramatically change the character of the area into a more transit, pedestrian and bicycle supportive environment, the auto trip generation forecasts used for the impact analysis are likely to be over-conservative and substantially overstate the impacts in both future alternatives.</p> <p>5. It is also noted that the trip distribution analysis assumed an internal trip capture rate of 7% within the study area. However, it does not appear to account for internal trip capture within individual Traffic Analysis Zones (TAZs), and therefore the results may overestimate future traffic volumes at the study intersections.</p>
	Fig. 16 series	The Existing Roadway Cross Sections show sidewalks along Halekauwila Street, Kamake'e Street, Pohukaina St., Kamani St., Ilianiwai St., Ward Ave., Waimanu St., and Auahi Street which conflicts with the Existing Pedestrian Facilities shown in Figure 14. The existing sections should be corrected to indicate the actual conditions.
	Figure 18	The Halekauwila Street Extension shown in Figure 18 is a new roadway section between Ward Avenue and Kamake'e Street. The Ward Neighborhood Plan shows a variation of this, with Halekauwila Street terminating at Ward Avenue. The proposed new street in the Ward Neighborhood Plan provides connectivity between Kamake'e Street and Ward Avenue.
	Figure 31	<p>We reiterate our concerns with the Halekauwila Street Extension as shown in Figure 31. The street proposed in the Ward Neighborhood Plan is in a similar alignment but does not connect to Halekauwila Street.</p> <p>In addition, Figure 31 shows Cummins Street extending from Waimanu Street to Ala Moana Boulevard, thus allowing traffic through a critical, primarily pedestrian oriented public plaza within the Ward Neighborhood Plan from Waimanu Street. There appears to be no justification within the DSEIS, from a traffic perspective, for this extension of Cummins Street. This extension would bisect a major block within the Ward Neighborhood Plan and would render it impossible to construct the Central Plaza that is currently envisioned. Please provide traffic or other analyses to support the extension of Cummins Street from Waimanu Street to Ala Moana Boulevard.</p>
Cultural Impact Analysis (Appendix B)	Section 3.4	The section relating to Kamake'e to Pi'ikoi Streets provides some initial description of the human burials found at the Ward Village Shops site. The report should be updated to include discussion of the O'ahu Island Burial Council (OIBC) process to recognize the cultural descendants in the Kaka'ako area, consultation with OIBC, consultation with the cultural descendants, and the ultimate reinterment of all the discovered human burial remains.

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preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.

- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Section 3.10 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

2.5.1 Parks and Open Space: Strategies for Meeting the Project Need:

- 2-8. It is the intent of the Mauka Area Plan to include bicycle facilities along Ward Avenue. However, the final layout of Ward Avenue will be determined through the Mauka Area Plan and Rules amendment process, pursuant to Chapter 91, Hawaii Revised Statutes.

We would like to note that the Ward Neighborhood Plan was submitted and approved under the existing Mauka Area Plan and Rules and was not considered in the proposed Draft Mauka Area Plan.

- 2-9. The Draft Mauka Area Plan states that the redevelopment of private properties presents opportunities to increase the availability of public open spaces. The proposed Open Space Network Plan

Ms. Jan Yokota  
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suggests several locations for new plazas and pocket parks. The Open Space Network Plan proposes a plaza at Ward Avenue and Auahi Street. Figure 2-3 Open Space Network Plan of the Final SEIS will be revised to reflect the correct location.

*2.5.2 Views and View Corridors:*

The UDA will be included in the Final SEIS as Appendix B.

*2.6.1 Roadway Network Changes:*

- 2-12. Clarification on promenade streets will be included in the Final SEIS.

The extension of Cummins Street to Ala Moana Boulevard would improve internal access for the Ward Neighborhood and relieve the traffic load at the adjacent intersections of Ala Moana Boulevard/Ward Avenue and Ala Moana Boulevard/Kamakee Street. The extension of Cummins Street would also help segregate local traffic from through-traffic on Ward Avenue, which is a major north-south arterial, likely reducing delay for people traveling between the Makai Area and H-1 freeway.

Proposed streets through the block bounded by Ward Avenue, Queen, Kamakee and Auahi Streets are intended to provide for maximum connectivity and to break up the large development block. The exact location of the proposed streets will be determined through the Mauka Area Plan and Rules amendment process, pursuant to Chapter 91, Hawaii Revised Statutes.

The Draft Mauka Area Plan proposes a planted median along Ward Avenue. To maintain acceptable service

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along the Ward Avenue, parking would have to be eliminated if the median were constructed. The following clarification regarding on-street parking on Ward Avenue will be made in the Final SEIS: "Remove on-street parking on Ward Avenue between Queen Street and Auahi Street."

We agree that it is important to allow on-street parking where possible to maintain viable retail storefronts along Ward Avenue and to enhance the streetscape experience. Removal of on-street parking during peak hours only will be considered.

*2.7.1 Inclusionary Housing:*

- 2-19. We acknowledge your comment that allowing units to be provided off-site may increase the economic viability of building the reserved housing units.

*2.12.4 Cost Estimates:*

- 2-31. Table 2-9, Traffic Signalization Improvement Costs, will be revised to identify the Kamakee/Queen Street intersections, rather than the Kamani/Queen Streets intersection.

*3.4.1 Affected Environment (Flood and Tsunami):*

- 3-5:8. The discussion on Natural Hazards, Affected Environment, Flood and Tsunami provides a discussion on the flood zones in the Mauka Area. All projects developed in the Mauka Area will be required to comply with applicable Federal, State and City and County permit requirements, including flood hazard ordinances.

Ms. Jan Yokota  
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Inasmuch as the final determination on FIRM maps is yet to be approved, the flood zone limits will be cited as an “Unresolved Issues” in the Final SEIS. Your comment on the proposed impact of flood insurance premium is noted.

*3.7.1 Affected Environment (Traffic):*

- 3-30. Bicycle lanes mentioned are Class II facilities, offering dedicated rights-of-way (“ROW”) for bicycle use. The Transportation Analysis (Appendix A) includes cross-sections for all streets and shows how the proposed bicycle lanes would be accommodated in the given ROW.

*3.10.2 Potential Impacts and Mitigation Measures:*

- 3-57. We acknowledge your disagreement with the statement from the Draft SEIS, which reads: “The blocks along Ala Moana Boulevard averages 250 to 275 feet deep. The shallow lot size is more conducive to medium-scale development”. The statement reflects the design concern of potential scale conflict, the shallow lot and the setback needed to scale down the high rises.
- 3-63. Architectural analysis is included in the Final SEIS and in the UDA (Appendix B) that supports the statement that Floor Area Ratio can be achieved with the street-front and mid-rise elements.

*3.13 Public Services and Facilities:*

- 3-100. All figures will be revised to reflect the realigned Auahi Street.

Ms. Jan Yokota  
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*5.1 Relationship between Local Short-Term Uses of the Environment and Maintenance of the Long-Term Productivity:*

Your disagreement with the statement from the Draft SEIS, which reads: "In the event structures are built to maximum allowable heights, the existing Mauka views of the Koolau Range may be eroded than under the No-Action Alternative, which permits building footprints to be built up to 16,000 square feet, resulting in bulkier and more massive structures" is noted.

*5.2.2 Impacts on Human Environment:*

With respect to the impairment of existing Mauka views of the Koolau Range, we acknowledge your statement that with appropriate design and orientation of buildings, Mauka-Makai views can be preserved.

*5.4 Probable Adverse Environment Effects that Cannot be Avoided:*

Your disagreement with the statement from the Draft SEIS, which reads: "The build-out of the Mauka Area under the Draft Mauka Area Plan would have less impact on the Mauka view of the Koolau Range than under the no Action Alternative, which permits building footprints to be built up to 16,000 square feet, resulting in bulkier and more massive structures" is noted.

*Transportation Analysis (Appendix A):*

1. The cumulative (future-year) traffic volumes are derived using growth factors by intersection approach, calculated from future-year model runs. These model runs estimate traffic on roadways given expected changes in land use and the roadway network. Any regional shifts in travel behavior as a result of

Ms. Jan Yokota  
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an improved jobs-housing balance would thus be accounted for in the derivation of growth factors.

2. The trip generation calculations were based on a net difference of land use assumed during the run of the base year and future year models. Any net negative differences in land use (i.e., as a result of demolition, redevelopment into another use, etc.) are considered as "negative trips" in the final trip generation calculations.
3. Land Use 230 (Residential Condominium/Townhouse) was selected because it has a larger sample size than other alternative ITE land use codes such as Land Use 231 (Low-Rise Residential Condominium/Townhouse) and Land Use 232 (High-Rise Residential Condominium/Townhouse).
4. Your comment that the future mode split was conservatively estimated is noted. The expected mode shift is difficult to estimate and depends largely on whether or not the planned infrastructure is constructed, in particular the new fixed rail guideway system, and how future development in the Mauka Area interacts with this infrastructure. Given these uncertainties, a conservative approach was taken which assumes a modest mode shift which could overestimate the amount of vehicular traffic under the Draft Mauka Area Plan if the entire planned infrastructure is constructed to maximize use of alternative modes of travel.
5. The internal trip capture rate of seven percent considers all possible original destination pairs within the study area, including trips beginning and ending within the same Traffic Analysis Zone ("TAZ"). It should also be noted that trips within the same TAZ would likely be walk or bicycle trips (i.e., non-auto trips) because of the proximity, and would thus not affect traffic volumes at all.

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*Fig 16:*

The Existing Roadway Cross Sections figures in Appendix A reflect the existing Mauka Area Plan's roadway cross sections. Figure 14, Existing Pedestrian Facilities, reflect existing conditions in the Mauka Area.

*Fig 18 & Fig 31:*

We acknowledge your comments on the Halekauwila and Cummins Street extensions. We would like to note that the final transportation plan will be ultimately determined through consultation with the City and County of Honolulu as well as the Kakaako community through the Mauka Area Plan amendment process.

*Cultural Impact Analysis (Appendix B):*

3-4 Section 3.5 of the Final SEIS and the Cultural Impact Assessment (Appendix D) has been updated to include discussion of the Oahu Island Burial Council ("OIBC") process to recognize cultural descendants in the Kakaako area, consultations with OIBC and with cultural descendants, and the reinterment of all the discovered human burial remains within the Ward Village site. All disinterred burials from the Ward Village site were reinterred in July 2008.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



## PRINCIPALS

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12519-31

August 21, 2008

Ms. Susan Tamura  
c/o Kristen Sohn  
Hawaii Community Development Authority  
677 Ala Moana Blvd., Suite 1001  
Honolulu, HI 96813

Subject: Kaka'ako Mauka Area Plan Draft Supplemental Environmental Impact Statement

Dear Ms. Tamura:

We appreciate this opportunity to provide comments on HCDA's Kaka'ako Mauka Area Plan Draft Supplemental Environmental Impact Statement (DSEIS). While we look forward to reviewing HCDA's proposed Mauka Area Rules in the future, we are submitting these comments now for your consideration during this Mauka Area Plan DSEIS process.

We support the State's intention to spur economic development in the Kaka'ako District, create a vibrant neighborhood for a growing population, and provide a sustainable alternative to suburban sprawl. We offer the following comments related to the physical form that might achieve these objectives for Kaka'ako.

#### 1) Building Tower Footprint Size

The Mauka Area Plan recommends that building tower footprint size be reduced from the current maximum of 16,000 SF (existing Mauka Area Rules) to a maximum of 9,000 SF.

In our experience, tower plates of 9,000 SF or less are technically difficult to achieve given existing fire codes which call for separation of exit stair shafts. Plates this size are also not very cost effective to construct and limit the effective use of the buildings. Building towers with plates between 10,000 and 12,000 SF provide the flexibility for multiple uses and, while they are typically more expensive to construct, they fall within the higher range of cost feasibility.

*We agree with a reduction of the maximum building tower footprint size for buildings up to 400 feet, but ask HCDA to consider a maximum of 10,000 – 12,000 square feet.*

#### 2) Building Height

The Plan recommends that building tower heights be limited to 200 feet along Ala Moana Boulevard and 400 feet elsewhere in the District.

We have studied the visual impact of 200 feet versus 400 feet towers along Ala Moana from the views shown in the DSEIS and see no discernable visual impact.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Governor

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Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Francis S. Oda, Arch.D, FAIA, AICP  
Chief Executive Officer  
Group 70 International  
925 Bethel Street, 5th Floor  
Honolulu, Hawaii 96813-4307

Dear Mr. Oda:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including the following.

- **Building Tower Footprint Size**

The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS. The alternatives analysis is also included in the Urban Design Analysis ("UDA") report as Appendix B of the Final SEIS.

- **Building Height**

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as being in a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana

Ms. Susan Tamura  
Hawaii Community Development Authority  
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From the ground plane at street level, the difference is not noticed, especially when the towers are sufficiently set-back from the property line. From a distance, the buildings blend into a silhouette created by the 400 foot buildings and are not very distinguishable on their own.

We are concerned that the smaller maximum floor plate reduction, which we support in concept for high-rises, needs to allow buildings to be built to 400 feet in order to be economically feasible. In addition, the lowering of heights along Ala Moana may reduced the FAR potential of lots, thereby diminishing the ability of Kaka'ako lands to off-set the development of lands in suburban and rural areas of the community. Smart Growth principles would indicate increasing densities in Kaka'ako rather than decreasing them.

The Mauka Area Plan provides for a mid-height element between 80 and 215 feet with a relatively unrestricted tower footprint size.

If Mauka Area Rules are established to implement the design standard described above, there is the potential for Kaka'ako to develop with a series of large block buildings similar to the Gold Bond Building on Ala Moana Boulevard. Such buildings - large footprint mid-height forms - create a mass that overpower streets, impede near and distant views, and block light from streets and sidewalks.

*We recommend that building heights should remain a maximum of 400 feet along Ala Moana Boulevard. Further, we suggest that HCDA consider establishing a maximum footprint for the mid-height element referred to in the Mauka Area Plan.*

### 3) Auahi Street

The Mauka Area Plan calls for the opening of Auahi Street and increased street connectivity throughout the District.

*We wholeheartedly support these proposals.*

We appreciate this opportunity to provide comments on the DSEIS. Please do not hesitate to contact me if you have questions.

Sincerely,  
GROUP 70 INTERNATIONAL, INC.



Francis S. Oda, Arch.D, FAIA, AICP  
Chief Executive Officer

Mr. Francis S. Oda, Arch.D, FAIA, AICP  
Page Two  
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Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, it warrants a discretionary design review to ensure that any proposed tower elements are planned to enhance the urban design framework in the Mauka Area. The review process will study various aspects of the proposed development such as building configurations, height, orientation, and location. The guiding principles for the review process can be found in Section 3.1 of the UDA, Appendix B. We agree with you on the benefit that higher density development at proper locations will bring to the district, which is also a key principle of smart growth. In the third alternative analysis, "intensified Transit Ready Development" is proposed as one of the design principles.

### • Auahi Street

We acknowledge your support of opening Auahi Street through to Pohukaina Street.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



HONOLULU

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August 21, 2008

01:Administrative Assign to Special Purpose

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

**Comments Regarding Draft Supplemental Environmental Impact Statement Mauka Plan**

Dear Ms. Tanner,

We appreciate the opportunity to respond to the Draft Supplemental Environmental Impact Statement/Proposed Revisions to the Kakaako Community Development District Mauka Area Plan and Rules.

It is our understanding that the proposed reduction in building heights (from the existing 40 floors to the proposed 20 floors), footprints (from the existing 16,000 square feet to the proposed 9,000 square feet), and square feet of office space (from the existing 640,000 square feet to the proposed 180,000 square feet), all lead to lower potential density. Other proposed changes impact affordable housing and excess parking quantification. By decreasing potential marketable density, the value of the underlying land is also decreased.

The proposed revisions will reduce the developer incentive necessary to encourage redevelopment. Most existing under improved land uses in the Kakaako area are generating a positive cash flow. To encourage redevelopment, which requires demolition of current structures and uses, the proposed revisions must generate sufficient profit to cover risk and provide an adequate return on the overall investment. The proposed master plan revisions will delay or deter redevelopment.

We recommend that economic models be developed to ascertain if redevelopment feasibility and residual land values under the proposed redevelopment guidelines are sufficiently attractive to incentivize developers and encourage the actualization of the envisioned development plan. Otherwise, the decrease in density will result in the continuation of the status quo which is certainly not the desired long-term or envisioned result by private landowners or the Hawaii Community Development Authority.

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. James E. Hallstrom, Jr., MAI, CRE  
The Hallstrom Group Inc.  
Pauahi Tower, Suite 1350  
1003 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Hallstrom:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

Our analysis has shown that the floor area ratio ("FAR") can be maintained with the proposed height and footprint reductions because some of the square footage requirement will be covered in the street front element and its maximum coverage of the site, allowing a reduced tower footprint. A greater amount of floor area can be accommodated by including a mid-height element.

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address issues related to urban form and design. The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development.

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that

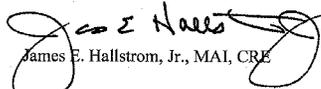
HONOLULU

Ms. Susan Tamura, Planner  
 August 21, 2008  
 Page 2

We appreciate the opportunity to share our opinion of the proposed revisions and their impact on the growth goals for Kakaako.

Respectfully submitted,

THE HALLSTROM GROUP, INC.

  
 James E. Hallstrom, Jr., MAI, CRE  
 /as/Misc08

Mr. James E. Hallstrom, Jr., MAI, CRE  
 Page Two  
 May 6, 2009

reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.
- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Section 3.10 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

We acknowledge your request for an economic model to ascertain if redevelopment feasibility and residual land values under the proposed redevelopment guidelines are sufficiently attractive to incentivize developers. An economic model for all parcels within the entire Mauka Area is unattainable as each development project has its respective project parameters. Financial parameters such as cost of equity, cost of debt, internal rate of return, and hurdle rate that are typically used in developing economic models for any real estate development can vary from one landowner to the next. It is not possible to develop an economic model that addresses the financial parameters of every landowner. At best, any economic model developed by the Hawaii Community Development Authority will have to be hypothetical in nature by necessity. We believe that the

Mr. James E. Hallstrom, Jr., MAI, CRE  
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physical development parameters such as floor area ratio, tower footprint, and height, provide more meaningful information to the landowners regarding development potential of their land parcels than a hypothetical economic model.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

RECEIVED  
AUG 22 2008



*Hawaii's Thousand Friends*

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Kaka'ako Draft Supplemental Environmental Impact Statement  
Mauka Area

Hawaii's Thousand Friends has the following comments, concerns and questions regarding the SDEIS for the Kaka'ako Draft Mauka Plan.

HCDA is using this SDEIS as an umbrella disclosure document for all future new and rehabilitation projects within the 450 acre Kaka'ako Mauka. Under the Chapter 343 Findings and purpose and definition this is impossible.

- Chapter 343 Findings and purpose states The legislature finds that the quality of humanity's environment is critical to humanity's well being, that humanity's activities have broad and profound effects upon the interrelations of all components of the environment, and that an environmental review process will integrate the review of environmental concerns with existing planning processes of the State and counties and alert decision makers to significant environmental effects which may result from the implementation of certain actions. The legislature further finds that the process of reviewing environmental effects is desirable because environmental consciousness is enhanced, cooperation and coordination are encouraged, and public participation during the review process benefits all parties involved and society as a whole. (Emphasis added)

It is the purpose of this chapter to establish a system of environmental review, which will ensure that environmental concerns are given appropriate consideration in decision making along with economic and technical considerations. [L 1979, c 197, §1(1); am L 1983, c 140, §4]

- Chapter 343 defines an "Environmental impact statement" or "statement" as an informational document prepared in compliance with the rules adopted under section 343-6 and which discloses the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects. (Emphasis added)

The SDEIS for Kaka'ako Mauka does not discuss the "interrelations of all components" nor does it "alert decision makers to significant environmental effects which may result from the



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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May 6, 2009

Ms. Donna Wong, Executive Director  
Hawaii's Thousand Friends  
25 Malunui Ave, Suite 102, No. 282  
Kailua, Hawaii 96734

Dear Ms. Wong:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter received via fax on August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following responses in the respective order of your comments.

The proposed action by Hawaii Community Development Authority ("HCDA") is to update its existing Kakaako Community Development District Mauka Area Plan ("Mauka Area Plan"). The Mauka Area Plan sets forth the planning principles and development parameters for the orderly redevelopment of Kakaako's Mauka Area. The EIS for the Mauka Area Plan was prepared in June 1983. A subsequent SEIS was prepared in 1985 when the State Legislature amended the KCDD boundary to include the Kakaako Makai Area.

The proposed revisions to the Mauka Area Plan include proposed changes to the land use, urban design, parks, open space, views, transportation, reserved housing and infrastructure plan. Inasmuch as information for all future Mauka Area projects is unavailable at this time, certain projections have been made to be able to assess impacts for the 20-30 year assessment period. We believe that the proposed revisions to the Mauka Area Plan will be fully assessed in the Final SEIS. Individual projects that trigger Chapter 343, HRS will be required to fulfill its own requirements.

implementation of certain actions” because it does not specify “certain actions” but instead lists needed new and rehabilitated infrastructure projects. Neither does it evaluate or give information on individual development proposals or projects so that decision makers will know the social, economical and cultural impacts of the individual and cumulative projects.

While the Draft Mauka Area Plan may be better than the existing Mauka Plan with regard to building height and view plains it still allows for walls of high rises that will obscure the Koolau Range and only provide glimpses between buildings of the majestic mountains behind them.

Since Ala Moana Beach Park and Kaka’ako Park, which are considered recreational areas available to Kaka’ako Mauka residents and make up most of the makai land use, the FEIS must explain how allowing 100 to 200 foot buildings along Ala Moana Boulevard that will block the present makai to mauka view and reduce air flow will socially effect visitors to these recreational areas.

The FEIS should explain why the HCDA contracted and paid for Kaka’ako Citizen’s Plan was so radically changed, provisions in the plan such as having human scale development of four to six story buildings that would allow for an basically unobstructed makai to mauka view plains were ignored and replaced with the Draft Mauka Area Plan.

The SDEIS lays out the components of conceptual plans in the Draft Mauka Area Plan as a high-density mixed-use urban center that “discourages” superblocks and street closures.

1. What processes/regulation will HCDA use to prevent the development of “superblocks” and street closures?
2. The SDEIS is contradictory. In one section it says the Draft Mauka Area Plan will discourage street closures then further in the document the following statement is made, “Several streets are designed to be gentrified as ‘promenade’ streets featuring service, retail, entertainment and open space.”
3. What is HCDA’s policy regarding street closures?
4. What does the following statement mean? “Through the implementation of the Plan HCDA proposes a “self-mitigating” plant that aims at curtailing the magnitude of impacts induced by maximum utilization of development provisions contained in existing Plan?”
5. The FEIS must provide a description of “self-mitigating” plant and define “magnitude of impacts” that will require self-mitigation.
6. The SDEIS provides data from the City Department of Planning and Permitting that Mauka Area population could increase from 6,180 (2000 census) to 30,253 residents by 2030 and housing units are expected to increase from 4,253 (2000) to 20,667 by 2030. Both figures assume that all potential development would be implemented in next two decades.
7. With population expected to increase by 24,073 and housing units expected to increase by 17,414 in the 450 acre Kaka’ako Mauka Area over a twenty-two year period.
8. Does the statement “. . .the resulting population increase and number of housing units would be expected to have less than significant impacts on population and housing” refer just to Kaka’ako Mauka or the entire island?

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The Draft Mauka Area Plan recognizes the value of preserving the Koolau Range and the ocean views. The Draft Mauka Area Plan proposes that buildings be slimmer and tower orientations to be in the Mauka-Makai direction with a maximum 4:1 ratio, longer side and shorter side, respectively. This measure would mitigate the impact of obliterating the existing view of the mountains and the sea. Chapter 3.10.2 of the Final SEIS includes an impact analysis on Makai to Mauka views and information on reduced air flows. In addition, an impact assessment on Makai-to-Mauka views is also included in the Urban Design Analysis (“UDA”) report as Appendix B of the Final SEIS.

The HCDA is unaware of a Kakaako Citizen’s Plan and if one exists, we did not contract to pay for it. We are aware that community groups have prepared a development plan for the Kakaako Makai Area. The Draft Mauka Area Plan and the subject SEIS pertains to the Mauka Area, not the Makai Area.

• **Superblocks and Street Closures:**

1. Chapter 206E-4 (7), Hawaii Revised Statutes (“HRS”) empowers the HCDA to prepare a community development plan for all designated community development districts. A community development plan includes community development guidance policies, district-wide improvement program and community development rules. The existing Mauka Area Plan roadway plan proposes superblock development by closing streets to create a superblock. The Draft Mauka Area Plan proposes to keep most streets open to provide for smaller development blocks and better street connectivity.
2. Street closures and Promenade Streets are two very different planning elements. Promenade streets are defined as streets with particular importance as public

### Employment

1. The statement "Negative impacts may result from absence of growth in other sectors such as light industrial because these jobs are likely to shift to other parts of the island rather than disappear altogether, these negative impacts are anticipated to be less than significant" is not substantiated by any facts.
2. What methodology was used to determine that light industrial businesses and jobs will relocate from Kaka'ako to other areas and not just go out of business?
3. What negative impacts are anticipated in the statement "Negative impacts may result from absence of growth in other sectors...?"
4. Without facts to back up such subjective statements it is impossible to evaluate the effects of a proposed action on the economic and social welfare of a proposed action.
5. The FEIS must contain data and methodology used to order to substantiate these statements.

### 2.3 Neighborhoods

1. The SDEIS gives the various zoning types but does not identify the boundaries of each zoning nor does it provide specifics on what density and height limits are permitted in each zoning. This information must be provided in the FEIS.
2. What are the density and height limits allowed for the development of residential and commercial use projects in the MUZ-R zoning?
3. What method(s) and policies will be used to determine "limited mixture" of neighborhood commercial activities allowed in an area designated for residential use?
4. Is the Sheridan Neighborhood the only MUZ-R zoned area within the 450 acre Kaka'ako Mauka Area Plan? If not, all others must be identified in the FEIS.
5. Without specifics regarding density, height, and number of commercial and residential projects allowed in the specific area it is impossible to evaluate the economic and social impacts of each zoning and development.
6. The FEIS must contain more specifics regarding zoning types, allowed density and heights in each, and how "limited mixture" will be determined.

### 2.4 Urban Design

#### 2.4.1 Principles

1. What types of support are anticipated from "adjacent landowners" along the proposed "landscaped pedestrian-way that links the Kaka'ako Mauka-Makai Promenade with Mother Waldron Playground" that will reintegrate the City and waterfront?
2. Who are the "adjacent landowners"?
3. Will public funds, facilities or other resources be used to fulfill this Mauka-Makai linkage? If so, identify the facilities and resources and total anticipated public funds in the FEIS.

#### Support the small-lot, mixed-use pattern of Central Kakaako:

1. How do limiting public infrastructure improvements to the use of IDs when "initiated only on the petition of a majority of property owners of the affected area" minimize disruption and possible displacement of existing businesses?
2. What is the rationale and policy for the requirement that IDs would only be initiated when petitioned by a majority of property owners? What are the consequences to businesses that lease their property?

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spaces, supporting a significant level of pedestrian activity and providing connections between public open spaces and destinations. Along Promenade streets, there is an emphasis on wide sidewalks with ample canopies of street trees and other pedestrian amenities.

Promenade streets identified in the Draft Mauka Area Plan include Cooke, Kamakee, and Auahi-Pohukaina Streets. Street closures pertain to a roadway plan that closes existing streets to determine development block size and pattern.

3. Under the Draft Mauka Area Plan, street closures are minimized to provide for maximum road connections. The proposed roadway plan will enable alternative routes for circulation and access to properties. This will reduce the traffic burden on principle streets and provide more convenient routes for all modes of travel.
- 4/5. In an effort to mitigate the worst case scenario under the existing Mauka Area Plan, several alternative development parameters, such as floor plate size, building height, bulk and mass, made available in the Draft Mauka Area Plan. Consequently, future projects under the Draft Mauka Area Plan, if adopted, would provide for a range of development possibilities within the Mauka Area.
- 6/7. Your comment that the 'Draft SEIS provides data from the City and County Department of Planning and Permitting on population projections' is noted.
8. The statement on population increase refers to the Island of Oahu.

3. In order to evaluate the economic and social impacts of each proposal a comprehensive evaluation of how many businesses and jobs will be lost in Central Kaka'ako due to new development, redevelopment and infrastructure improvements must be included in the FEIS.
4. The FEIS must contain information on the impact to existing businesses that lease space and their ability to pay higher lease rents when areas are redeveloped with greater density and heights.

**Support TOD:**

1. The SDEIS advocates reducing parking for personal vehicles but does not provide information on how visitors to residents or businesses in a TOD development will be impacted.
2. How will reduced parking impact businesses dependent on visitors from outside of Kaka'ako? How will reduced parking spaces impact businesses within Kaka'ako?
3. Will Transit Oriented Developments be required to provide parking spaces for residents and visitors? If so, what is the percentage of parking required for each development?
4. What is the methodology used to calculate the number of needed parking spaces?
5. Without this information it is impossible to evaluate the social and economic effects.

**2-6 Chapter 2 Project Descriptions**

**Mid-Height Element:**

1. If the intent of the Mid-Height is to "maintain Mauka-Makai view planes" how will allowing a building to be 80-215 feet in height accomplish this goal?
2. There is no map showing where any of the height limits will be allowed. Without knowing the exact locations and quantity of buildings that will be permitted to have heights of 80-215 feet it is impossible to evaluate any social, economic, or visual effects of a single or multiple projects.
3. What mechanisms will be used to "encourage projects" that will maintain Mauka-Makai view planes?

**2.5 Parks, Open Space, and Views**

1. The SDEIS only identifies public property to be used as park space. Are there requirements that private landowners dedicate a percentage or portion of their land to the creation of parks? If so, what is that requirement? If not, explain why landowners who will benefit from the development of public infrastructure and greater density and height limits are not required to provide park space?
2. What type(s) of "formal joint school/community use arrangement(s)?"
3. How was the conclusion reached "that when it comes to public open space in an urban setting, quality and location are more important than quantity and size?" This may hold true with a development that will be void of children but if these housing units are being built for families then confining children and parents to a high rise without a conveniently located park and other outdoor recreational opportunities such as ball fields is short sighted and poor planning.
4. What are "urban plazas?" what population are they designed for?
5. Why is the Mauka Area Plan advocating that pocket parks just be landscaped green areas and not have any "activity generating elements" when Kaka'ako will be a high density

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• **Employment:**

1. Impacts resulting from the absence of growth in other sectors are expanded upon in Chapter 5 of the Final SEIS.
2. The determination of light industrial businesses and jobs to relocate from Kakaako was made based on public input from Kakaako business and landowners. Businesses expressed the difficulty to remain viable because of rising property taxes and their likelihood of relocating their businesses.
3. Negative impacts include, but are not limited to, increased property taxes and loss of business and employment.
4. Your comment that 'without facts to back up subjective statements it is impossible to evaluate the effects of a proposed action on the economic and social welfare of a proposed action' is noted.
5. As stated in item 2, impacts relating to future projects are primarily based on issues identified by existing Kakaako landowners and businesses through community meetings.

• **2.3 Neighborhoods:**

1. The land use map (Figure 2-1) in the Draft SEIS delineates the land uses by color. A legend is also provided which identifies specific land uses. A height map will be included in the UDA, Appendix B.
2. Residential and commercial projects in the proposed Mixed-use Zone Residential ("MUZ-R") are granted a

- area with children and families in need open areas for plan and relaxation?
6. It should be imperative that developers are required to provide on-site park and recreational facilities and not just a wish as stated in the SDEIS.
  7. Without knowing the park and open space requirements for each zoning and density area it is impossible to evaluate the social or environmental impacts.
  8. Why wasn't the Urban Design Analysis (UDA) study for this DSEIS that examines the degree of view obstruction caused by the build-out of the Mauka Area under the existing Mauka Area Plan and the Draft Mauka Area Plan included in the SDEIS?
  9. Perhaps the Analysis would have given the reader a better understanding of the potential impacts from the placement of the various heights and densities. Without such an analysis it is impossible to assess the impact of partial or full build-out on makai-mauka view planes.
  10. The Urban Design Analysis must be included in the FEIS.

## 2.6 Transportation Plan

1. Was a study conducted to go along with Figure 2-5 Roadway Network? If yes, why wasn't it included in the SDEIS?
2. Figure 2-5 gives readers a basic concept of what is being proposed but only in the Kaka'ako Mauka area so there is no way to evaluate impacts beyond the 450 acres. Such as, what are the impacts on receiving streets when streets currently one-way are converted to two-way traffic? What are the impacts of creating median planters on the flow of traffic?
3. How and why was it determined that the pedestrian realm requires "no front yard space and no trees?"
4. Without descriptions of closing off, extending, realigning, reducing lane width, removing parking and interaction between connecting streets beyond the 450 acres it is impossible to evaluate the impacts on foot and car traffic.

## 2.7 Reserved Housing

1. What percentage of units in a housing development on a 20,000 sq. ft. lot must be Reserved Housing?
2. What percentage of units in a housing development on lots larger than 20,000 must be Reserved Housing?
3. Is participation in the Reserved Housing Program a requirement for development in Kaka'ako Mauka? What are the consequences if a developer does not want to participate in the Reserved Housing program?
4. What entity will construct units funded through in-lieu fees?
5. Will in-lieu of build units be required to be within Kaka'ako Mauka or can housing units be elsewhere on the island?
6. Describe the formulas used to create the required units of Reserve Housing within the various density and height areas?
7. Does the statement "developers would receive non-monetary offsets in the form of density (or height) bonuses" apply to all developers who participate in the Reserved Housing Program within the 450 acre Kaka'ako Mauka Area Plan? If so, does that mean that developments who receive offsets could exceed the 215 as well as increased density anywhere in the Kaka'ako Mauka?

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floor area ratio ("FAR") of up to 2.0. Maximum height allowed is 65 feet.

3. The Draft Mauka Area Plan proposes limited mixture of land use for the MUZ-R area only. The MUZ-R area is a predominantly residential neighborhood comprised of small, fee simple properties. Properties within the MUZ-R zone will be allowed to develop up to .3 FAR in commercial use. This retains the general residential character of the Sheridan Tract neighborhood. Chapter 2.2 of the Final SEIS provides a description of land use zones proposed in the Draft Mauka Area Plan.
4. Under the Draft Mauka Area Plan, there are no other parcels, apart from the Sheridan neighborhood, zoned MUZ-R within the Mauka Area.
- 5/6. Chapter 3.10 of the Final SEIS and the UDA (Appendix B) provides information on height, density and urban design parameters of the proposed alternatives.
6. Chapter 2.4.2, Development Provision, of the Final SEIS includes information on development provisions for the proposed action. Additional information on height, density and urban form is provided in Chapter 3.10 of the Final SEIS and the UDA (Appendix B). As stated in item 3, the Draft Mauka Area Plan proposes limited mixture of land use for the MUZ-R area only. The Draft Mauka Area Plan proposes a limit of .3 FAR of commercial use for the MUZ-R area.

- **2.4 Urban Design:**

- **2.4.1 Principles:**

1. In order to achieve the landscaped pedestrian-way that links the Kakaako Mauka-Makai promenade

8. What formula will be used to determine how much “bonus” each development that participates in the Reserved Housing Program will receive?
9. What are Planned Development benefits?
10. Without knowing how many, where or the magnitude of “bonuses” it is impossible to evaluate social and economic effects. This information must be in the FEIS.

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### 2.7.2 Preference for Units vs. In-Lieu Fees

1. Why are fractional units exempted from Reserved Housing Program and given preference of “in-lieu” fees?
2. Currently fractional ownership is being used for vacation rentals. It is disappointing to see that this concept is not being discouraged since it flies in the face of HCDA’s concept of inclusionary housing that encourages developers to create “housing for their workforce and enable families of moderate means to benefit from urban redevelopment”.

with Mother Waldron Neighborhood Park, larger sidewalks are anticipated. Support from the adjacent landowner may include private development of the sidewalk area. In the Makai Area Plan, a large setback along Cooke Street is off-set by no setback along Coral Street.

### 2.7.5 Proposed Reserved Housing Program Checklist

1. If a developer chooses to offer rental units what is the process once the fifteen- year rental period expires? Will new leases be offered? Will the tenants be required to leave?
2. What types of “life care facilities” will be exempted from gross floor area?

2. In the case of the landscaped pedestrian-way that links the Kakaako Mauka-Makai promenade with Mother Waldron Neighborhood Park, the adjacent landowner is Kamehameha Schools.

### 2.8.1 Historic and Cultural Resources

1. Is being listed on the State or National Register of Historic Places one of the requirements for consideration of protection?
2. Explain why the architecturally unique Ossipoff designed IBM Building was not identified as a building to be protected?
3. This exclusion is puzzling especially in light of the fact that the much newer and less architecturally unique NBC has been identified as a building worthy of protection because of its “cultural and aesthetic values.”
4. The FEIS should identify the cultural values of the NBC and explain why the Ossipoff IBM Building was not considered for protection?

3. There are various funding mechanisms for the Mauka-Makai linkage. As mentioned in item 2, the landscaped pedestrian-way can be developed by the adjacent landowner in conjunction a future development project. Another mechanism is the through the Improvement District Program. Improvement Districts (“ID”) are discussed in Chapter 2.12.1 of the Final SEIS and would be funded by the State. Cost estimates of the ID Programs are disclosed in the same chapter.

### 2.9 Social & Safety Plan

1. What does “housing support facilities,” mean and what types of support will “housing facilities” provide? What social needs will these facilities fulfill?
2. The narrow statement that “The social needs of the Mauka Area will largely be met by the provision of “housing support facilities” is puzzling since a communities social fabric is made up of many activities and institutions such as church’s, school’s, community events, sports leagues, parks, sports playing fields etc.
3. The SDEIS states that “Chapter 206E, HRS directs HCDA to create in the Mauka Area, a community that serves the highest needs and aspirations of Hawaii’s people. Such a community must provide all of the basic needs of its residents, employees, and visitors in a safe and socially desirable environment.” Yet, the SDEIS does not define what the basic needs of a new community are or how those need’s will be met.
4. The FEIS must identify the components necessary for a socially well-balanced community and describe how those components necessary for the social wellbeing of residents will be met.
5. The SDEIS does not address the social upheaval that will occur when businesses and

➤ *Support the small-lot, mixed-use pattern of Central Kakaako:*

1. HCDA intends to minimize adverse impacts to the small business owners and property owners affected by the ID Programs. To that extent, it is anticipated that programming of any future ID would include consultation with the landowners and businesses to mitigate the impacts of roadway and infrastructure improvements.
2. The policy for the requirement that IDs would only be initiated with approval from majority of property owners was developed through

households are displaced. Without knowing the extent of the relocation of businesses, households and loss of jobs it is impossible to evaluate the social and economical impact singularly and cumulatively.

6. The FEIS must identify the number of businesses, households, as close as possible, that will be evicted and the number of jobs that will be lost.

### 2.9.1 Social Proposals

1. What types of services are envisioned that require fees?
2. How will ensuring that services are competently administered and giving priority to residents and employees within Kaka'ako Mauka convey a "feeling of wellbeing?"
3. The SDEIS does not specifically identify what attributes and facilities are needed to ensure the social wellbeing of residents and workers in the 450 acre Kaka'ako Mauka Plan area. This information must be contained in the FEIS.

### 2.10.1 Relocation Proposals

1. Does the statement, "Relocation refers primarily to displacement resulting from government-initiated projects" mean that if a business or household is displaced by a private entity then various types of assistance are not available to them?
2. What types of government-initiated projects that would displace a business or household?
3. What does "provide meaningful relocation assistance" mean and who will qualify for such assistance?
4. What does "properly relocated" mean?
5. The SDEIS fails to identify how many businesses and household could be evicted due to new development, redevelopment or neighborhood rehabilitation. The FEIS must contain this information.
6. The SDEIS does not consider or calculate the social disruption, upheaval and consequences when businesses and residents are forced to evacuate their home or place of business. This information must be contained in the FEIS.
7. Why are only "persons displaced by government action" being offered the opportunity to return to avoid major financial loss? Why isn't the same offer made to those displaced by private actions?
8. What will HCDA do to "minimize or ameliorate any serious negative impacts of displacement, such as loss of employment or business, imminent loss of shelter, and monetary losses?"
9. Since HCDA has sole planning and decision making jurisdiction over the 450 acre Kaka'ako Mauka area what other government "induced or stimulated" governmental "planning decisions" will force the displacement of businesses and households?
10. Are only businesses and households that are displaced by "public acquisition" eligible for temporary relocation facilities? If so, why aren't these same provisions offered to businesses and households displaced by private interests?
11. Is eminent domain anticipated to be the primary means to acquire property within the 450 acre Mauka area?
12. This section talks about providing "equitable assistance" that may include, "payments to displaced businesses to aid moving costs: allowance to relieve relocation effort: substitute payments to assist owner-occupants who purchase: rent subsidy to owner-occupants: substitute payments to assist tenant-occupants who purchase or rent: and substitute

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community meetings with Central Kakaako landowners and businesses. Central Kakaako landowners have requested involvement on when and where ID projects would be implemented for Central Kakaako. Meetings with Central Kakaako businesses are on-going with the goal of determining short-and-long term needs of landowners and business. A discussion on potential impacts and mitigation measures for Central Kakaako is provided in Chapter 3.11.2 of the Final SEIS.

3. Under the Mauka Area Plan, each landowner and business has the prerogative of retaining its existing business, renovating an existing structure, or redeveloping its property. There are no projects scheduled for redevelopment within the Central Kakaako area at this time.
4. HCDA anticipates that increased property tax and rent may cause the affected business to relocate to another affordable location. HCDA is currently working with landowners and businesses through a series of public meetings and workshops in addressing issues relating short-and-long term plans for Central Kakaako properties. A discussion on potential impacts and mitigation measures for Central Kakaako is provided in Chapter 3.11.2 of the Final SEIS.

- **Support Transit Oriented Development ("TOD"):**

1. TOD is an area within a 10-minute walk from a transit stop that is designed to maximize access to public transportation. Higher densities with less parking can be

- housing subsidy for tenants” but the total cost of these services is not in the SDEIS.
13. The FEIS must contain the anticipated amount of money that will be needed to provide for relocation services and costs including identification of the source(s) of funding.
  14. Will businesses and households displaced by private acquisition be offered the same “comparable replacement facilities at reasonable rates” as those offered to businesses and households evicted by public acquisition? If the answer is no, explain why.
  15. What types of assistance will HCDA give to the State and County displacing agencies to help develop and implement relocation assistance programs? If funding is provided by HCDA where will that money come from – public or private entities or both?
  16. Identify the “specific public improvement projects” that will force the displacement of a business or household and that will make a business or household eligible for relocation assistance.
  17. What types of “advisory services” will be offered to displaced individuals and businesses of private sector actions, or to persons or business concerns occupying property adjacent to any property acquired for public improvement and are caused substantial economic injury because of the public improvement?
  18. What formula will be used to determine financial reimbursement to businesses or residents for loss of property or lease?

#### 2.11.2 Public Facilities Proposals

1. What is the “program” that is referred to in the SDEIS?
2. It is hard to believe that this SDEIS for the Kaka’ako Mauka Area Plan with a planning horizon of 2030 and a population increase of approximately 24,073 by 2030 does not expect additional police, fire and health services are “to be required.”
3. As a full disclosure document the FEIS must provide data on how many new safety personnel will be needed, financing for the new positions and at what stage of development new safety personnel will be required and requested.
4. It is impossible to evaluate the social, economical or environmental effects of public facilities because specifics are not given only generalities such as “public facilities will be located on sites which will be convenient for the people they are intended to serve” or “A new school may need to be established as the school age population increases to a level which warrants additional school facilities.”
5. Without specific information such as potential future school sites or exact locations of public facilities it is impossible to evaluate any social, environmental or economic effects.

#### 2.11.3 Public Facilities Plan Provisions

1. What method(s) will be used to assess the private sector “for the costs of public facilities which benefit private sector developments?”
2. What types of “publicly provided incentives” will be offered to private developers to entice the development of public facilities?

#### 2.12 Infrastructure and Utilities Plan

1. Why wasn’t the KCDD Mauka Area Infrastructure Plan, that supports the Draft Mauka Area Plan, included in the SDEIS? The SDEIS cites the Plan but without the Plan being included in the SDEIS making it impossible to determine what effects projects noted in

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accommodated based on the project’s dependence on transit.

2. The Draft Mauka Area Plan proposes a multi-modal transportation plan with provisions for pedestrians, public transportation (transit and buses), cars and bicycles. Since it is a multi-modal transportation plan, all forms of transportation are taken into consideration. In considering parking requirements, it is expected that areas with a reliable high capacity transit system would reduce dependence on the automobile.
- 3/4/5. We would like to clarify that HCDA is not establishing a TOD within the Draft Mauka Area Plan at this time. The Draft Mauka Area Plan supports a future TOD, in concept, as there are two proposed transit stations programmed within the Mauka Area. The high capacity transit system and associated TOD are under the auspices of the City and County of Honolulu, not the HCDA.

- **2-6 Chapter 2 Project Description:**

- *Mid-Height Element:*

1. To mitigate impact on the existing Koolau Range and ocean view, the Draft Mauka Area Plan proposes height restriction complemented with building setbacks, floor plate size, and tower orientation, are proposed.
2. A height map will be included in the Final SEIS. Chapter 3.10.2 of the Final SEIS contains a visual impact analysis comparing the impact of maximum development allowed under all proposed alternatives.

the Infrastructure Plan will have on the social, environmental and economic wellbeing of businesses and residents in Kaka'ako Mauka?

2. The statement "establish an infrastructure system that adequately supports future development, development growth and diversification and densification of land use and population" is subjective and impossible to respond too.
3. More definitive data must be provided in the FEIS.
4. What is percentage of funds needed for new, rehabilitation and maintenance of infrastructure projects within the 450 acre Kaka'ako Mauka Area is anticipated to be appropriated by the legislature through the 2030 horizon?
5. What is the percentage of the cost for infrastructure will be required of private property owners?
6. Will private entities be assessed a percentage annually for maintenance of public infrastructure that benefits their development?

#### 2.12.1 Improvement District Program

1. What types of "supporting" and "increased economic opportunities for small business owners and owners of small land parcels" is HCDA working one?
2. Have small business and small parcel land owners been informed of existing assistance programs?
3. Have they been involved in the formation of these supporting economic opportunities?
4. Dislocation of countless numbers of small businesses and loss of property by eminent domain are real threats as Kaka'ako is gentrified so actual numbers of possible eviction and programs and monetary support that will be available must be articulated in the FEIS.
5. The SDEIS did not provide sufficient information regarding anticipated ID Projects so it was impossible to evaluate the social, environmental and economic impacts

#### 2.12.2 Existing Infrastructure

1. Instead of providing specific information on the condition of infrastructure individually and collectively including costs the SDEIS only gives generalities such as "The existing infrastructure was assessed to verify whether the general conditions and capacities would be able to support density and population forecasts out to the year 2030."
2. Without specific information on the condition of each road, sewer line, drainage system and the cost of rehabilitation, replacement or new systems separately and collectively it is impossible to evaluate the social, environmental or economic impacts.
3. This information must be provided in the FEIS.

#### 2.12.3 Infrastructure Evaluation

1. The KCDD Mauka Area Infrastructure Plan, which is not a part of this SDEIS, found, "the existing drainage system within the Kakaako District is inadequate to accommodate the City design flows for both the existing and future conditions when taking flow from outside the district into account that contribute to the existing storm drain system" and "The drainage system is adequate to manage storm water contribution from within the Mauka Area only."
2. Presently there is no way to separate the Kaka'ako Mauka drainage system from areas outside the 450 acres. As long as this system exists it is irrelevant that the drainage system within the Mauka Area is adequate.

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3. The Mauka Area Rules adopted pursuant to Chapter 91, Hawaii Revised Statutes ("HRS") will establish parameters for all development within the Mauka Area.

#### • 2.5 Parks, Open Space, and Views:

1. Pursuant to Chapter 206E-12, HRS, Dedication for Public Facilities as a Condition to Development, all developers are required to dedicate public facilities for commercial and residential floor area. The Authority may expend the moneys for the purchase, creation, expansion, or improvement of public facilities, including parks and recreational facilities. To date, approximately \$3.38 million has been expended or approved to be expended from public facilities dedication fees for parks within the Mauka Area. In addition, the HCDA has acquired approximately 98,000 square feet of land through public facilities dedication for the expansion of the Mother Waldron Neighborhood Park and Makai Gateway Park.

We would also like to note that, under the existing Mauka Area Plan and Rules, all private residential projects with development site of 20,000 square feet or more are required to provide 55 square feet of recreation space per dwelling unit. As a result of this requirement, 17 acres of private recreational space has been developed in the Mauka Area.

2. Memorandum of Agreement ("MOA") is an example of formal joint school/community use arrangement. A MOA may contain conditions, the extent, and descriptions of uses permitted.
3. The Draft Mauka Area Plan acknowledges the amount of land committed to public park space falls short of the City and County of Honolulu's Park Planning Standards. In as much as it is unrealistic to expect that large

3. Yet, the SDEIS concluded “the relative, impermeable character of the developed land (percentage of hard surface) would not alter significantly by the year 2030, and as such, the amount of runoff contributions to the existing drainage system would not increase and worsen the condition from the current state.” How can this be when the system has been declared inadequate?
4. What process was used to reach the conclusion that the projected addition of approximately 24,073 new residents, approximately 17,414 new housing units plus untold numbers of visitors lured to the new shopping and entertainment opportunities will not impact the existing and inadequate drainage system?
5. This type of subjective platitudes throughout the SDEIS makes it impossible to evaluate the social, environmental and economic impacts of an inadequate drainage system.
6. Kaka`ako Mauka cannot and does not live in a vacuum, water flows down hill and Kaka`ako is at the receiving end. Therefore, if the drainage systems mauka of Kaka`ako are inadequate and will not, for financial reasons, be upgraded to hold additional capacity then it is foolhardy to suggest that the drainage system will only handle water generated within the 450 acres.
7. The SDEIS is inconsistent. Section 2.7 Transportation states that in Central Kaka`ako “the pedestrian realm requires no front yard space and no trees.” Yet, this section proposed to mitigate localized “stormwater ponding” and “water capture” by “increased plantings of groundcover and vegetation within roadway right-of-ways.
8. The FEIS must identify each sewer line and holding system that will be replaced, and provide information on the capacity of each line, provide a timeline, total cost of replacement, identify financing options and evaluate effects on the receiving ocean environment.
9. Without adequate and complete information it is impossible to evaluate the impact of increased sewage and drainage on the ocean receiving waters.
10. What agency(s) or private entity(s) will be responsible physically and financially for the installation and maintenance of traffic signs, signals and street lighting?

#### 2.12.4 Cost Estimates

1. What agency(s) or private entity(s) will be financially responsible for the infrastructure construction costs of \$5,549,000 for storm drain system, \$49,482,000 for sewer system, \$4,700,000 for water system, \$900,000 for traffic signalization, \$5,140,000 for street lights and \$21,870,000 for street improvements?
2. Are these figures for all needed infrastructure until 2030? If not, the FEIS must contain the timeline for these figures and provide additional figures for the remaining years.
3. It is insufficient to say that, “Drainage improvements may include 18-inch drain line and appurtenant drain inlets and/or catch basins along the street noted in Table 2-3.” The exact dimensions of each drain line must be provided in order to evaluate the single and cumulative impact on the drainage systems and receiving waters.
4. The SDEIS evaluates costs in 2008 dollars but build out within the 450 acres is projected to occur incrementally until 2030. Therefore, the FEIS must provide figures that reflect true costs up to 2030.

#### 2.13 Implementation

1. The SDEIS fails to provide information on the increased amount of water that will be

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amounts of land can be acquired for large public parks in a built-up urban area like Kakaako where land costs are high and most properties are currently in use. The Draft Mauka Area Plan proposes the following strategies to meet the demand for parks and outdoor recreation.

- Use of vacant public land. The former Pohukaina School is programmed for a possible future school site. If a school is built at this site, it should provide some additional outdoor recreation facilities for children on the school grounds itself. If a public school is not built on this site, it could be used for the expansion of Mother Waldron Neighborhood Park.
  - Shared use of public recreation facilities, including McKinley High School.
  - Enhance pedestrian connections to nearby public parks and campuses. As a centrally located urban district, the Mauka Area offers a wide array of places within walking or bicycling distance to shoreline parks, public squares and campuses.
  - Private investment in open space and recreational facilities. The redevelopment of private properties presents opportunities to increase the availability of public open space and recreational facilities for use by neighborhood residents.
4. An urban plaza is a public gathering place much like Tamarind Park in downtown Honolulu. In the context of the Mauka Area, urban plazas are often sighted with food vendors, outdoor dining, programmed entertainment, public art and water features. Urban plazas are intended for those who live, work, and visit the Mauka Area.

carried through new and larger drains and sewage pipes. Without this information it is impossible to evaluate the individual and cumulative impact on the receiving ocean water body.

2. This information must be contained in the FEIS.

### 2.13.1 Mauka Area Rules and Project Review

1. Is there currently a provision for "variances in cases of hardship" under the HCDA rules? If so, what are the thresholds that must be met to qualify?

### 3.1.1 Affected Environment

1. While this section notes that due to the built urban asphalt and concrete surface environment that absorb the heat there is a "slight temperature difference" it fails to say what that difference is or if there are any negative impacts from the temperature difference.
2. The FEIS must provide more comprehensive and factual information on current and future impacts of the built out conditions when the area will contain more, denser and taller buildings that will reduce air flow.

### 3.2.2 Potential Impacts and Mitigation Measures

1. Impacts due to increased development on soils "defined as Poor" should have been identified in this SDEIS. As stated it is unclear what or when "further geotechnical analysis" will be performed. It will be an unnecessary waste of money should infrastructure be put in to accommodate development only to find out that unreliable soil conditions won't safely allow development.
2. A complete geotechnical analysis for the areas identified with poor soil must be conducted and included in the FEIS in order to ensure the safety of future residents and visitors and a wise use of taxpayer money.

### 3.5 Archaeological and Historic Resources

#### Archaeological Resources

1. It is unsatisfactory to conclude that when "Post-contact habitation refuse and fill layers are found throughout the area." that "no major pre-contact habitation areas have been found in the Kakaako area. It appears, based on the results of previous archaeological work, that all or most of the permanent habitation sites were located farther inland." What documentation is this statement based on?
2. What is meant by further inland? Are the "inland" areas within the Draft Mauka Area Plan 450 acres for which this SDEIS has been prepared?
3. To avoid inadvertent destruction of 'iwi, habitation sites and other archeological artifacts and costly delays in infrastructure development, further studies of areas known or suspected of containing archeological remains within the 450 acre Mauka Plan area should be conducted and then identified on a map attached to the FEIS.
4. After a lengthy discussion on how culturally rich in post-contact Hawaiian archeology the Kaka'ako area is the following disturbing statement is made, "To preserve Kakaako's historic resources, the Draft Mauka Area Plan calls for protection of buildings which are historically significant, in productive use, and economically self-sustaining."
5. Does this mean that a building must be productive and economically self-sustaining to

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5. The Draft Mauka Area Plan proposes pocket parks as one type of park that can be provided by private developers. Quieter pocket parks may be located on a local street, with a greater emphasis on landscaping and seating.
6. Under the existing Mauka Area Plan and Rules, developers of residential projects are required to provide on-site recreational space within their projects. To date, approximately 17 acres of active and passive recreation have been developed within private developments. We expect that the requirement for on-site recreational space will continue to be required.
7. Under the existing Mauka Area Rules, the recreational requirement for residential use is currently 55 square feet per dwelling unit. The on-site recreational requirement under the new Mauka Area Plan and Rules will be determined through the Mauka Area Rule amendment process, pursuant to Chapter 91, HRS.

8/9/10. The UDA will be included in the FSEIS as an appendix. We agree that the UDA report may facilitate understanding of the development provisions presented in the Draft Mauka Area Plan.

#### • 2.6 Transportation Plan:

1. In 2005, HCDA embarked on a comprehensive review and revision of the Mauka Area Plan and Rules in response to long-standing issue relating the Mauka Area Plan's urban design scheme and concern regarding the cohesiveness and livability of Kakaako's neighborhoods. The roadway network was developed as part of the revisions to the Mauka Area Plan. As part of the SEIS process, a transportation study was conducted to assess

- warrant protection?
6. Are there protection plans for Hawaiian sites other than those listed on the State and Federal Historic Preservation registers and are “in productive use, and “economically self-sustaining?”
  7. The FEIS must explain why “productive use” and “economically self-sustaining” are qualities used to measure whether an historical site will or will not be protector.
  8. The SDEIS also notes that “Properties listed in both Registers include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture rise to the ranks of protection.” (Emphasis added)
  9. This reference to American history is disturbing. Hawai`i is rich in Hawaiian cultural, historical and cultural sites and artifacts most of which preceded American occupation. These sites are not American they are Hawaiian. This policy statement and criteria that leaves out Hawaiian historical sites is narrow-minded and shows a disturbing lack of concern for Hawaiian culture and history.
  10. What criteria must a property owner meet in order to obtain a “certificate of appropriateness?”
  11. What is the filing process for a certificate of appropriateness? Does the HCDA board or executive decision grant a certificate of appropriateness?
  12. What process was used in crafting the rule that HCDA must grant an application for a certificate of appropriateness if: (1) the proposed action will not hinder the protection and use of the historic property; (2) the property as it exists is totally inadequate for the owner and/or lessee’s legitimate needs; or (3) the owner or lessee is unable to earn a reasonable return unless the proposed project is undertaken?”
  13. Under these narrow conditions there appears to be no way for HCDA to protect historical properties, short of buying them, even those identified in Table 3-2 Properties to be protected in the Mauka Area because the narrow conditions do not allow for refusal of an applicant who makes the argument that the site is inadequate or not economically viable.
  14. The SDEIS admits that “Ongoing and future development / redevelopment efforts resulting in excavation may result in the destruction or permanent burial of essentially all of the cultural remains encountered.”
  15. Yet, the only protections offered by HCDA will be to “encourage potential developers in the Kakaako Mauka Area to consult with the SHPD before preparing any development plans to familiarize themselves with the archaeological and cultural issues relating to the Mauka Area.”
  16. According to this comment HCDA is not recommending that archaeological reconnaissance be conducted prior to development. All that is required is to become familiar with “archaeological and cultural issues.”
  17. This is unacceptable. To prevent costly delays and massive destruction of archeological sites and artifacts HCDA must require that all proposed developed, redevelopment and rehabilitation projects conduct an archeological survey.
  18. Without comprehensive information on and understanding of where potential burials and archeological sites are located, the context and scope it is impossible to evaluate the impact of single and cumulative developments on the cultural practices on the Hawaiian community.

### 3.10 Parks, Open Space, and Visual Resources

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the proposed roadway plan. The transportation study is included in the Final SEIS as Appendix C.

2. Impacts related to the proposed roadway changes are detailed in the Transportation Study, Appendix C of the Final SEIS.
  3. The term ‘pedestrian realm’, as proposed in the Draft Mauka Area Plan, is used to describe the layout of what is referred to as the sidewalk area. The pedestrian realm consists of tree/furniture zone next to the curb, a clear walk zone, and a frontage area at the face of the adjacent buildings. Except for service and alleys, all streets will include street trees.
  4. Chapter 3.7 of the Final SEIS includes a full discussion and assessment on the transportation plan, including the Draft Mauka Area Plan’s proposed roadway alignment and its impact on the District.
- **2.7 Reserved Housing:**
    - 1/2. The Draft Mauka Area Plan proposes 20% of residential floor area be reserved for individuals and families earning between 100 to 140 percent of median income.
    3. All residential development projects on a lot of 20,000 square feet or larger are required to participate in the reserved housing program. Participation in the Reserved Housing Program is a requirement of the development permit.
    4. Historically, HCDA along with the Hawaii Housing Finance and Development Corporation have collaboratively developed affordable and reserved housing projects in Kakaako.

1. While the SDEIS states, "The goal of creating these controls is to preserve visual assets that are unique to Honolulu and Kakaako" we could not find any written controls in this section.
2. An explanation of the "controls" must be included in the FEIS.
3. The PUCDP identifies two mauka view plains of Punchbowl from Ala Moana Park and Magic Island respectively that were not included in this document. The FEIS must evaluate the impact on the view plan from these vantage points.
4. What types of programs does HCDA have in place to ensure that existing parks and open spaces will be preserved?
5. If Reserve Housing is a major component and requirement of all development how will private developments provide on-sight recreational facilities if the statement "Affordable and reserve housing projects often cannot accumulate extensive recreational amenities due to the initial construction cost, the reduction of marketable floor area, and the maintenance costs to the resident" is true?

### 3.11.2 Potential Impacts and Mitigation Measures

1. Why is HCDA permitting the placement of buildings up to 215 feet in height on top of 65 foot Street-Front Element? The potential increase to 280 seems to make a mockery out of the intent of lower building heights.
2. Once a building passes above the 100-foot level the height almost becomes irrelevant and no matter how a building is oriented massive structures, especially when placed in succession, will wipe out any meaningful mauka-makai view corridors.
3. Glimpses of the Koolau through narrow corridors that exist between high-rise buildings is just a tease of what lies hidden from view.
4. Hawai'i prides itself on the beautiful unique scenery. High-rise development that creates barricades to view planes destroys the ambiance that is Hawai'i's shining glory. Once view planes are lost they can never be regained.
5. The FEIS must contain information on how much of the existing view plain as seen from Ala Moana Park, Kewelo and Kaka'ako makai area will be lost and compare that with how much view plain will be left once Kaka'ako Mauka reaches full buildout.
6. What calculations were used to determine that "While displacement may be necessary, the inconvenience caused to the affected persons and the uses are anticipated to be short-term" therefore, "no mitigation measures are proposed?" (Emphasis added).
7. Loosing your home or business can have devastating long-term social and economical effects. No-where in this disclosure document is there a discussion on potential long-term impacts and how to address them. Given the gravity of the loss of a business, job and home not addressing the need for long-term solutions and determining that mitigation measures are not necessary is short sighted. Unless dealt with these social and economical issues could put extreme pressure on government at all levels to provide solutions.

### 3.12 Social and Economic Characteristics

1. It is a pretty telling statement that even though streets within the Central Kakaako area are generally unimproved and lack storm drains and other utilities "property owners and business owners would generally prefer to stay where they are."
2. The central location of Kaka'ako is convenient for people who work downtown, live in

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5. Chapter 206E-4(18), HRS, allows the development of reserved housing within areas immediately surrounding the community development district, areas within the central urban core, and in outlying areas within the same island as the development project. The Draft Mauka Area Plan proposes a preference for inclusionary zoning, where reserved housing units will be provided on site.
6. The Draft Mauka Area Plan proposes that all new residential projects on lot size of 20,000 square feet or more reserve 20% of residential floor area for individuals and families earning between 100 to 140 percent of median income.
7. The Draft Mauka Area Plan proposes offsets for providing reserved housing. Offsets include: density or height bonuses; unit size reduction and finish cost adjustment; reduce parking requirement, design flexibility; fee waivers reductions or deferrals, and fast tract permitting for development permits.
8. The density bonus will be roughly equivalent to the required set aside for reserved housing.
9. Unlike the existing Mauka Area Plan and Rules, the Draft Mauka Area Plan may not provide a Planned Development option. Development requirements are based on lot size.
10. Chapter 2.7 of the Final SEIS shall include information on the proposed reserved housing offsets.

#### • 2.7.2 Preference for Units vs. In-Lieu Fees:

- 1/2. "Fractional ownership" as mentioned by Hawaii's Thousand Friends, appears to pertain to "timeshare" units. Timeshare is typically associated with resort

East Honolulu or the Windward side to come to small businesses for services. Dispute the poor street conditions businesses have survived primarily because people need services that are convenient and centrally located.

3. It is only logical for business to want to be located on land they own or lease at a reasonable rate and that is in a convenient location. Isn't that why the rush for development of some of the larger land owner?

### 3.12.2 Potential Impacts and Mitigation Measures

#### Population Conditions, Housing, and Employment

1. If warehousing, light industrial and manufacturing are continually pushed out by gentrification of an area then the declaration that there will be a gradual decline in light industrial uses, as stated in this SEIS, will become a self-fulfilling prophecy.
2. Kaka'ako was once a thriving neighborhood with jobs, homes and community. Slowly, as powers to be saw the financial potential in Kaka'ako the area is being taken over for high-end residential, retail and entertainment. So of course, the remaining remnants of a once vibrant community feel threatened.
3. The SDEIS admits, "Jobs are likely to shift to other areas of the island and disappear altogether" but somehow has determined that the negative impacts of loosing a business, job or income are "anticipated to be less than significant; therefore, no mitigation measures are proposed."
4. Instead of the cavalier attitude with people's lives the SDEIS is supposed to disclose the effects of a proposed action on the economic, social and cultural welfare of the community and State.
5. The FEIS must evaluate the single and cumulative social, economic and cultural impacts from what could be massive relocation, displacement, loss of jobs, loss of businesses and loss of homes.

#### Water Quality

1. The SDEIS identifies sediments, oil and debris from construction and dewatering activities as having potential impacts to near shore coastal water and Honolulu Harbor but doesn't not provide any details on the amount of pollutants from individual developments and collectively from all potential development that will be funneled to the ocean or their effect on the receiving waters from. This information must be provided in the FEIS.
2. Potential negative impacts from dewatering such as settling within Kaka'ako Mauka and surrounding areas are not discussed in the SDEIS. More in-depth information regarding this potential threat to surrounding buildings and infrastructure must be provided in the FEIS.
3. Will each construction project be required to obtain an NPDES Permit for construction related stormwater discharges or could HCDA obtain one NPDES to cover all construction activities within the 450 acre Kaka'ako Mauka Plan area?
4. What method(s) would be used to treat effluent from dewatering sites prior that will discharge into a drainage system or surface waters?
5. The SDEIS does not explain how the conclusion was reached that "Due to the existing ... development within the Mauka Area, future redevelopment and improvements would not significantly alter the hydrological runoff character of the land" and that "the relative

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condominium units, in which multiple parties hold rights to use the property, and each "share holder" is allotted a period of time in which they may use the property.

Fractional units in the Draft Mauka Area Plan, refers to the 'left over' floor area from a reserved housing requirement that is not large enough for a living unit. For example, if there is 75 square feet 'left over' of a reserved housing requirement, the developer may be able to pay a cash-in-lieu for the 75 square feet.

#### • 2.7.5 Proposed Reserved Housing Program Checklist:

1. Rules governing the status of the rental units will be adopted pursuant to Chapter 91, HRS, pertaining to Rule Making Procedures.
2. It is anticipated that facilities such as assisted living care facility and nursing facilities will be exempted from gross floor area from reserved housing requirements.

#### • 2.8.1 Historic and Cultural Resources:

1. Yes, being listed on the Hawaii and/or National Register of Historic Places was the primary criteria for protection.
2. As stated in Item 1, the primary criterion for the protection designation is to be listed on the Hawaii and/or National Register of Historic Places. The regulation of Hawaii Register of Historic Places is under the auspices of the Department of Land and Natural Resources' State Historic Preservation Division ("SHPD"). Nomination procedures are regulated pursuant to Chapter 6E, 5.5, HRS, Hawaii Historic Places Review Board. It is our understanding that for private properties; the respective landowners must initiate the nomination process. According to the SHPD,

percentage of hardscape and impermeable surface to more permeable areas would not change substantially from the existing to the year 2030” when no one can predict the amount of development or what types of development proposals will come before HCDA.

6. In order to get an accurate picture and understanding of social, environmental and economic effects the FEIS must provide greater detail on potential impacts from incremental development and full build out.

#### Sanitary Sewer Systems

1. What is the total cost of replacing approximately 18,000 feet of sewer trunk lines shown in Figure 3-18? How will these infrastructure projects be financed? This information must be contained in the FEIS.
2. What are the “downstream facilities” referred to in the SDEIS?
3. What factors were used to determine that “downstream facilities” are “adequate” to accommodate the proposed increases in both pipe sizes and flows and that “No adverse, negative impacts system are anticipated from the proposed improvements are anticipated?”
4. This information must be provided in the FEIS.

#### 4.2.1 Hawaii State Plan

##### §226-5.b.1, 2, 3, 4 Population

- It is unclear how the Draft Mauka Plan meets §226-5.b.4 *Encourage research activities and public awareness programs to foster an understanding of Hawaii’s limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaii’s population* since the SDEIS does not mention research activities or any population public awareness programs that will foster awareness of Hawaii’s limited capacity to accommodate growth within the Mauka Plan area.

##### §226-6.b.2 Economy—In General

- It is unclear how creating a high-density urban residential, commercial and industrial area whose intended beneficiaries are purported to be Hawaii’s working population and families will *Promote Hawaii as an attractive market for environmentally and socially sound investment activities that benefit Hawaii’s people.* (Emphasis added)

##### §226-11.b.2, 3, 8 Physical Environment – Land-Based, Shoreline, and Marine Resources

- It is unclear how adding 24,073 additional residents and 17,414 new housing units within a 450-acre parcel over the next twenty-two years with increased density, runoff, sediment loading and sewage will *Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.*
- The only times that *natural resources* was mentioned in this SDEIS was in sections of the State Plan so the Mauka Area Plan does not appear to *Pursue compatible relationships among activities, facilities, and natural resources.*

##### §226-12.b.1, 3, 4, 5 Physical Environment – Scenic, Natural Beauty, and Historic Resources

- We are sure that HCDA believes that by lowering the tower heights along Ala Moana

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the IBM building is not listed on the National or Hawaii Register of Historic Places.

- 3/4. The Neal Blaisdell Center (“NBC”) is identified as a cultural resource in the Draft Mauka Area Plan. The NBC is a primary venue for cultural events such as plays, operas, concerts, conventions and sporting events. The cultural value of the NBC is noted in Chapter 2.8.1 of the Final SEIS.

#### • 2.9 Social & Safety Plan:

- 1/2. Housing support facilities discussed in the Draft Mauka Area Plan pertain to uses that are vitally linked with housing facilities and the residents involved. Uses include childcare facilities, gerontology programs, and recreational facilities. For example, in the State’s Kamakee Vista family housing project, a childcare center is located on the ground floor of the project and active recreation (playing courts) is provided on the deck of the parking structure. In senior rental projects, programs geared to help the elderly (exercise classes) and community gardens are provided to support the project’s residents.
3. Basic needs of the Mauka Area community and implementation tools are detailed in Chapter 2.9 of the Final SEIS.
4. The components for a socially balanced community are detailed in Chapter 2.9 of the Final SEIS.
5. Chapter 3.12 of the Final SEIS, anticipates the plausible scenarios of the eventual build out of the Mauka Area under the Draft Mauka Area Plan. The extent of relocation of the existing Kakaako businesses is difficult to ascertain, as it is the prerogative of each landowner to

Blvd. from 400 to 215 + 63 ft. for Store Front and turning tall buildings in a makai to mauka direction, which leaves peep holes between an unknown number of buildings, that they are preserving mauka views and vistas. If HCDA was sincere and serious about *Promote[ing] the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features* the Mauka Plan would advocate a low-rise human scale development that didn't obscure the Koolau Range from almost all ocean and beach vantage points along the ocean front.

- It is unclear how such a dense urban environment as that envisioned in Kaka'ako Mauka will. ....complement *the natural beauty of the islands.*

#### §226-13.b.2, 3, 5, 6, 7 Physical Environment – Land, Air, and Water Quality

- It is unclear how developing a high-density high-rise residential, commercial and industrial area *Promote(s) the proper management of Hawaii's land and water resources.*
- While the SDEIS states that NPDES and other permits will be required, promotes the use of Best Management Practices and increased landscaped areas the SDEIS does not recommend preventive measures beyond what is required and standard practice. Therefore, the SDEIS does not *Promote effective measures to achieve desired quality in Hawaii's surface, ground, and coastal waters.*
- It is unclear how creating a dense urban center will *Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.*

#### §226-19.b.1, 2, 3, 5, 6 Socio-Cultural Advancement—Housing

- Throughout the SDEIS rehabilitation projects are only mentioned in connection with infrastructure. We were unable to find any reference to maintaining, improving or rehabilitating existing housing units or residential areas as stipulated in the provision to *Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.*

### 5.1 Relationship between Local Short-Term Uses of the Environment and the Maintenance of Long-Term Productivity

1. This section of the SDEIS recognizes that "In the event structures are built to maximum allowable heights, the existing Mauka views of the Koolau Range may be eroded as seen from vantage points identified in the City and County of Honolulu's PUCDP..." yet there is nothing in this document that provides alternative to 100-200 feet structures.
2. More provisions from the citizen's plan that calls for human scale development could have been adopted into the Draft Mauka Area Plan. Instead that Plan was ignored and HCDA commissioned the new Draft Mauka Area Plan.
3. An EIS is supposed to suggest alternatives but there none other than the no build and the current Mauka Plan are noted in this SDEIS.
4. The FEIS must include the provisions relating to view plains that are in the Citizen's Plan as another alternative.
5. The SDEIS did not evaluate impacts to regional traffic patterns even though it notes that traffic increases "will affect" outside traffic.
6. The FEIS must include information on how regional traffic patterns will be affected and potential costs for needed roadway upgrades etc.

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remain in the district, relocate or redevelop. In our meetings with Mauka Area landowners, most are proposing to stay in the District.

6. Inasmuch as majority of the properties within the Mauka Area are privately owned, the State has no intention of evicting any businesses or households. As stated above, it is the prerogative of each private landowner to develop its own property.

The Draft Mauka Area Plan is a planning document that provides a range of options for area landowners. Landowners can remain as is, renovate existing structures or redevelop. For the redevelopment option, proposed urban design parameters and requirements are established.

#### • 2.9.1 Social Proposals:

1. Example of envisioned services requiring fees are child care programs. Gerontology programs may or may not require fees, depending upon funding opportunities.
2. Although "well-being" may be interpreted differently by many, in the context of the Draft Mauka Area Plan, the term is used to convey confidence in the administration of social programs and the resulting sense of security and trust in the social programs. We anticipate social services programs to be regulated under the Department of Health or Department of Commerce and Consumer Affairs.
3. The public facilities program is discussed in Chapter 3.14 of the Final SEIS.

### 5.2 Cumulative and Secondary Impacts

1. The SDEIS is the disclosure document that is supposed to identify and evaluate the social, economic, environmental and cultural affects of each individual and collective action but there are so many unknowns and subjective statements in this document that it is impossible to fully address or understand all the implications, effects and impacts on Kaka'ako resident and visitor population, the natural environment and areas beyond the 450 acres.
2. The statement in this section that "The implementation of the Draft Mauka Area Plan in light of each or all of the plans mentioned must be assessed to ensure all reasonable cumulative and secondary impacts are identified and mitigated to the fullest extent" is mind boggling because assessment of effects on the social, economic, environmental and cultural wellbeing of residents and the land is what this SDEIS is suppose to do not a Plan.
3. The above statement demonstrates that in order to fully understand the single, cumulative and secondary impacts on the social, economic, cultural and environmental wellbeing of citizens and the land from the many developments, new infrastructure and rehabilitation projects that could occur in the 450 acre Kaka'ako Mauka Area over a twenty-two year horizon requires that an Environmental Impact Statement must be done for each proposed project.
4. The SDEIS refers to other Plans but does not include any information nor does it identify or assess cumulative and secondary impacts from the proposals in those.

#### 5.2.2 Impacts on the Human Environment

- It is perplexing as to why HCDA is not taking a pro-active position and requiring extensive archeological reconnaissance be conducted for the entire 450 acres in light of the knowledge that "... the amount of *iwi* suspected to be contained in the Kakaako District, and the number of projects and the level of development being proposed, cumulative impacts are anticipated to impact this and potentially other archaeological resources."
- This wait-and-see attitude could lead to the inadvertent destruction of many *iwi*, archeological sites, features and relics.
- It is unacceptable to not disclose and evaluate individual and cumulative impacts of the various infrastructure and development scenarios on cultural resources in this disclosure document that is meant to "*discloses the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action*" (Emphasis added)
- In order to prevent mass and unexpected destruction the FEIS must provide comprehensive information potential locations of burials and habitation sites including a map showing the potential sites.

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#### • 2.10.1 Relocation Proposals:

1. Households and businesses displaced by private sector action will receive public assistance services except for monetary payments. Information on relocation can be found in Chapter 2.10 of the Final SEIS.
2. An example of a government program that would cause displacement of households and/or businesses is the development of a public housing project, parks and roadway improvements.
3. It is the intent of the Authority to provide meaningful relocation assistance for all persons and businesses displaced due to public action. The Authority shall be guided by the following criteria established in the Draft Mauka Area Plan:
  - To phase redevelopment to minimize disruptions.
  - To ensure that families and businesses are, to the extent practicable, properly relocated before permitting their displacement by new development, redevelopment or neighborhood rehabilitation and businesses.
  - To return as many persons displaced by government actions back to the Mauka Area.
  - To provide opportunities for persons and businesses displaced by government action to avoid major financial loss.
  - To minimize or ameliorate serious negative impacts on displacees, such as loss of employment or business, imminent loss of shelter, and monetary losses.

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- To provide counseling, information and referral services to displacees affected by private sector actions, induced or stimulated by governmental planning decisions.
- 4. 'Properly relocated' means families and businesses are able to function in a new location.
- 5. The DSEIS and the Final SEIS assess potential impacts from the implementation of the Draft Mauka Area Plan in the next 25 to 30 years. The Draft Mauka Area Plan does not require eviction of businesses or households; however, due to economic and other conditions in the future, businesses and households may choose to voluntarily relocate.
- 6. Chapter 2.10.1 of the Final SEIS includes a discussion on relocation proposals and mitigation measures.
- 7. The State does not control nor regulate individual leases for private properties. As mentioned in item 1, households and businesses displaced by private sector action will receive public assistance services except for monetary payments. The State does not have the resources to pay for relocation cost due to private redevelopment.
- 8. Examples of efforts to 'minimize or ameliorate any serious negative impacts of displacement' include counseling, information and referral services and low-interest loan programs.
- 9. Under the Draft Mauka Area Plan, there are no proposed 'takings' of properties beyond the right-of-way alignments. Other governmental planning decisions that may displace businesses and households include the City and County of Honolulu with roadway improvement

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pertaining to the High Capacity Transit System project, as well as State and Legislative actions.

10. See response to Item #7.
11. Eminent domain is one of the tools that can be used to acquire properties for public purposes.
- 12/13. An equitable assistance would occur in case of a displacement, and the amount allotted would be decided on a case-by-case basis. As stated in Item 9, there are no proposed 'takings' of properties beyond the right-of-way alignments.
14. See response to Item #7.
15. HCDA does not provide assistance to other State and County displacing agencies to help develop and implement relocation assistance programs. In the past, funding for relocation was obtained through an appropriation from the State Legislature. Monies received from the State Legislature was project specific and not for general relocation. HCDA is not proposing any specific project in the Draft Mauka Area Plan that would displace existing households or businesses.
16. In the past, specific public improvement projects included a public housing project (e.g. Kamakee Vista, Kauhale Kakaako), parks (expansion of Mother Waldron Neighborhood Park), and for roadway improvements.
17. Advisory services primarily include counseling and referral services.
18. In the past, the formula used to determine financial reimbursement to businesses or residents for loss of property was fair market value.

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- **2.11.2 Public Facility Proposals:**

1. The public facilities program (“Program”) has been established to provide various public facilities for creating neighborhoods that give Mauka Area residents, employees and visitors a sense of identity and belonging. Public facilities include meeting areas, urban parks, community centers, parking, streets and utility and service corridors projects to adequately service development improvements. Public facilities may also include fire and police stations, medical facilities, and schools.
2. Through the Draft SEIS public comment process, the Honolulu Fire Department and Honolulu Police Departments has indicated that no additional facilities will be required.
3. Hiring safety personnel is not proposed with the Draft Mauka Area Plan. Each private development project is responsible for its own safety plan and program.
- 4/5. The location of a future school is shown on Figure 2.1 of the Final SEIS. Actual programming and development of the school will be under the State Department of Education. Information on the existing Fire, Police, and medical facilities will be added to the FSEIS. No new Fire, Police or medical facilities are proposed, unless integrated into private projects.

- **2.11.3 Public Facilities Plan Provisions:**

1. Pursuant to Chapter 206E-12, HRS, all developers are assessed a public facility dedication fee for the development of residential and commercial floor area.

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2. Publicly provided incentives include possible modification of design standards (heights, open space, density, yard setbacks and parking).

- **2.12 Infrastructure and Utilities Plan:**

1. The Infrastructure Plan will be included in the FSEIS as Appendix E.
2. The Infrastructure Plan was based on a 25-year projection of future development. Assumptions and criteria in establishing projects are included in the Infrastructure Plan, Appendix E.
3. Comment noted on more definitive data must be provided in the Final SEIS.
- 4/5. Funding for infrastructure improvements have generally been split between the State (70%), utility companies (10%) and private landowners (20%). Funding is Legislative Capital Improvement Projects funding. For utility companies, funding has been negotiated on a project-by-project basis. There may be no assessment on private landowners if Senate Bill SB 721, HD1, of the 25th Hawaii State Legislature becomes law.
6. In the past, private entities have not been assessed for maintenance of public infrastructure that benefits their development. Upon completion of the improvement district, the infrastructure is turned over to the City and County of Honolulu for maintenance and repair.

- **2.12.1 Improvement District Program:**

1. Support and increased economic opportunities for small business owners include the option to redevelop their properties into highest and best use.

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- 2/3. Since 2005, HCDA has conducted on-going meetings with the small business and small lot landowners to inform them of existing assistance programs.
4. Under the Draft Mauka Area Plan, there are no plans to acquire small lots by eminent domain. If gentrification should occur, it would be through the efforts of individual landowners.
5. At this point, there is no future ID planned for the Mauka Area. HCDA is currently working with the community in determining which areas need improvement.

- **2.12.2 Existing Infrastructure:**

- 1/2/3. Comment noted. Specific infrastructure information on each system (sewer, drain, water, electrical, telecommunication) is provided in Appendix E, Infrastructure Plan.

- **2.12.3 Infrastructure Evaluation:**

1. The capacity and adequacy/inadequacy of the existing drainage system are analyzed in the Infrastructure Plan (Appendix E). The existing drainage system within the Mauka Area is inadequate to accommodate the City design flows for both the existing and future conditions when taking flow from outside the district into account that contribute to the existing storm drain system. The drainage system is adequate to manage (City design) storm water contribution from within the Mauka Area only. This clarification of the system being able to accommodate "City design" storm water contribution from within the Mauka Area only will be added to the Final SEIS.

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2. This statement of inadequacy pertains to the City design (100-year recurrent) flows for drainage systems. The existing drainage system can accommodate the more frequent, day-to-day rainfall intensities for both the Mauka Area and adjacent contributory areas. There is an existing inadequacy with regard to the City design flow for both areas. Any additional storm water discharge above the existing condition shall be retained on-site for individual, specific development and redevelopment projects. City requirements for retaining all additional storm water in excess of the existing condition for individual projects are discussed in the Final SEIS.
3. The amount of runoff contributions to the existing drainage system would not significantly increase from the current state. Any additional storm water discharge above the existing condition caused by local hardening of ground character will be retained on-site for individual, specific development & redevelopment projects by City requirements. Thus no increase in drainage flow to the existing system, which constitutes “worsening the drainage condition from the current state”, is anticipated. Even though the existing drainage system is inadequate to accommodate the City design (100-year recurrent) storm water flows, it can accommodate the more frequent, day-to-day rainfall intensities for both the Mauka Area and its adjacent contributory areas. Storm water criteria and calculations, and the capacity and adequacy/inadequacy of the existing drainage system are analyzed in Appendix E, Infrastructure Plan.
- 4/5. Estimated design storm water flows are determined from 3 main factors, the design size of the drainage area (from a bird’s-eye view), design intensity of rainfall event, and the impermeable character of the area. The first 2

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factors are constant, while the third will not change substantially with a projection to the year 2030 by developments and redevelopments. Additionally, vertical development, which increases cumulative floor area but not bird's-eye view area, does not impact design quantities of storm water runoff. Storm water quantities are independent and unaffected by population growth, new housing units (that will mostly be via redevelopment), visitor count, or new shopping and entertainment opportunities.

6. The existing drainage system can accommodate the more frequent, day-to-day rainfall intensities for both the Mauka Area and its adjacent tributary areas. City design standards for storm water management focus on an particular project area; worsening existing storm water conditions of downstream parcels is not a consideration. Further, physical constraints, flat terrain, and low elevation (high groundwater table) hinder water interception and increased drainage system capacity. Any additional storm water discharge above the existing condition will be retained on-site for individual, specific development and redevelopment projects.
7. The Draft Mauka Area Plan proposes different types of roads with varying widths and improvements to accommodate each neighborhood type. In HCDA's community meetings, Central Kakaako landowners and businesses had requested that HCDA develop a service road type configuration. They expressed that in the service, light industrial areas, landscaping and setback would not be needed as most of the lots are 5,000 square feet or less. The additional setback would limit the redevelopment potential of the service area character of Central Kakaako.

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The increased plantings of groundcover and vegetation within road right-of-ways discussed in Section 2.12.3 apply to wider roadways, which may include medians and grassed sidewalks. Typical City road cross sections contain plantings.

8. The Infrastructure Plan, Appendix E, provides specific capacity information and recommendations for sewer system improvements, with associated cost estimates. Sewage will flow to the Sand Island WWTP, undergo treatment, and be released to the ocean as it does in the existing condition.
9. Comment noted. Sewage will flow to the Sand Island WWTP, undergo treatment, and be released to the ocean as it does in the existing condition. Due to City requirements preventing individual specific projects from increasing the net amount of storm water runoff from their site to the existing drainage system, storm water discharge to the ocean is anticipated to remain relatively unchanged when forecasted out to the year 2030. Additionally, each individual applicant for a City Building Permit for development or redevelopment within the Mauka Area shall need to address storm water quality requirements for their specific project in accordance with Section II of the City's "Rules Relating to Storm Drainage Standards.
10. Maintenance of traffic signs, signals and street lighting will be the responsibility of the City and County of Honolulu for City-owned streets. Maintenance of traffic signs, signals and street lighting along Ala Moana Boulevard will be the responsibility of the State Department of Transportation. The private landowner will maintain private streets.

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- **2.12.4 Cost Estimates:**

1. Funding for infrastructure improvements have generally been split between the State (70%), utility companies (10%) and private landowners (20%). Funding is Legislative Capital Improvement Projects funding. For utility companies, funding has been negotiated on a project-by-project basis. There may be no assessment on private landowners if Senate Bill SB 721 HD-1 of the 25th Hawaii State Legislature becomes law.
2. The estimated costs are for all needed infrastructure until 2030.
3. Drain line sizes and locations of appurtenant drain inlets and catch basins are indicated for planning purposes only. Exact sizes of drain lines and locations of appurtenant inlets and catch basins will be determined on a case-by-case basis during the actual design phase (and associated hydrologic and hydraulic analyses) of each specific individual project.
4. The elements of future ID Projects (which dictate the incremental build-out) are yet to be determined. Due to the uncertainty of when each improvement project will occur with prevailing costs at the projects' time of occurrence and where the project will occur and its extents, present day dollars are used to provide a standard basis of comparison. Because of the time value of money, present value of the cost is a better measure than future values in estimating future CIP costs.

- **2.13 Implementation:**

- 1/2. Due to City requirements preventing individual projects from increasing the net amount of storm water runoff from their site to the existing drainage system, storm

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water discharge to the ocean is anticipated to remain relatively unchanged when forecasted out to the year 2030. Additionally, each individual applicant for a City Building Permit for development or redevelopment within the Mauka Area will need to address storm water quality requirements for their specific project in accordance with Section II of the City's "Rules Relating to Storm Drainage Standards."

- **2.13.1 Mauka Area Rules and Project Review:**

1. For a variance application to be approved, the project applicant must demonstrate that, due to physical constraints on his parcel, he or she is not able to enjoy the same rights enjoyed by other property owners situated in the same zoning/land use.

- **3.1.1 Affected Environment:**

1. As a result of the existing urbanized environment of the Mauka Area, which is composed of asphalt and concrete surfaces there is a slight temperature difference in comparison to the overall climate of the region. At this time, we are unable to determine what the temperature difference is. This will be listed as an unresolved issue in Section 5.4.2 of the Final SEIS.
2. We acknowledge your comment that the Final SEIS must provide more comprehensive and factual information on current and future impacts of the built-out conditions, when the area will contain more, denser and taller buildings that will reduce airflow. Appendix B, Urban Design Analysis, contains information on airflow patterns in the built environment.

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- **3.2.2 Potential Impacts and Mitigation Measures:**

- 1/2. Landowners or developers will decide if a geotechnical analysis is required for their respective project site. A comprehensive geotechnical study on private property is beyond the scope and resources of the Draft Mauka Area Plan.

- **3.5 Archaeological and Historic Resources:**

1. The study area was apparently outside the two most intensely populated and cultivated areas—Waikiki and Honolulu (Kou)—along this portion of Oahu’s southern shore during pre-Contact times. It was nonetheless well utilized by the Hawaiians for activities appropriate to the specific environment, salt making and farming of fish ponds, along with some wetland agriculture. The study area was also among the last areas of urban Honolulu to be built on and developed.
2. “Further inland” refers to the habitation area immediately inland of the shoreline. It is a marshy area with salt pans and ponds. The phrase was used describing the settlement pattern of the Kakaako area, not specific to the Mauka Area.
3. The Cultural Impact Assessment (Appendix D) includes information on all known burials within the Mauka Area. As part of any ID project, early consultation with DLNR’s State Historic Preservation Division (“SHPD”) is programmed into project schedule and scope.
- 4/5. As stated in the Draft SEIS, the criteria for protection of building include, historically significant, in productive use, and economically self-sustaining.

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6. All historic properties in the Mauka Area that are to be preserved are registered with either State or the National Register of Historic Places.
7. The Draft Mauka Plan states that the preservation, restoration and use of historic sites are very important from an economic standpoint. The retention of historic and cultural sites promotes the uniqueness of Hawaii's history. Historic and unique buildings in the Mauka Area, which are renovated and made economically productive can contribute to the continuing distinctiveness and uniqueness of the Mauka Area, and serve as attractions to residents and visitors in Honolulu.
- 8/9. It is opined that the phrase "American history" is inclusive of record of events that took place, affecting different people groups, on American soil. Kawaiahao Church and Grounds, Mission Houses, Old Kakaako Fire Station, McKinley High School, Makiki Christian Church and the Royal Brewery Building, have value as buildings significant to Hawaii's own history as well as part of American history.
10. The criteria for meeting the Certificate of Appropriateness is detailed on Section 3.5 of the Final SEIS.
11. Certificate of Appropriateness is filed in conjunction with a development permit application. The Authority approves certificate of appropriateness, based on the advice and recommendation of the SHPD.
12. Criteria for the Certificate of Appropriateness process was established under Chapter 91, Hawaii Administrative Rules. As stated in Item 11, the Authority approves Certificate of Appropriateness, based on the advice and recommendation of the SHPD.

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13. Comment noted.
14. We acknowledge that impacts are being disclosed.
- 15-17. Procedures are currently in place for early consultation with SHPD prior to initiation of the development permit process. Developers and landowners must submit a letter from SHPD stating that early consultation has taken place. SHPD may or may not require that an archaeological survey be completed.
18. The Cultural Impact Assessment (Appendix D) includes information on all known burials within the Mauka Area.

- **3.10 Parks, Open Space, and Visual Resources:**

- 1/2. The controls are disclosed in Chapter 2, Project Descriptions of the Final SEIS.
3. Chapter 3.10.1 of the Final SEIS evaluates the impact on the view plane from the Kewalo Basin Park and Kakaako Waterfront Park, the two PUCDP two vantage points. In addition to the two vantage points, four other vantage points throughout the Mauka Area were included in the assessment of any potential impact to the Mauka-Makai views. The assessment will be detailed in Chapter 3 of the DSEIS.
4. Development of parks and open space areas are regulated through zoning provisions in the Mauka Area Rules.
5. Under the existing Mauka Area Plan, all residential and commercial projects are required to provide on-site recreational space within the project site. Reserved housing projects may not be able to provide 'extensive'

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recreational amenities, but projects can accommodate play courts, picnic areas and other passive uses. It is anticipated that the new Mauka Area Plan will continue the on-site recreational requirement.

- **3.11.2 Potential Impacts and Mitigation Measures:**

1. The existing maximum height limit is 400 feet on lots greater than 80,000 square feet. The mid-height element is envisioned as an alternative to the 400-foot tower. The UDA shows that panoramic views to the Koolaus are maintained with the 215-foot building.
2. The UDA shows that panoramic views to the Koolaus, from the PUCDP vantage points are maintained with the 215-foot building height. In addition, the citing of the tower element to a Mauka-Makai orientation would preserve more of the Mauka-Makai views than if no action was taken.
3. Your comment that 'glimpses of the Koolau through narrow corridors that exist between high-rise buildings is just a tease of what lies hidden from view' is noted.
4. Your comment that once view planes are lost they can never be regained is noted.
5. The anticipated build-out of the Mauka Area under the existing plan as well as the Draft Mauka Area Plan is shown in Chapter 3.10 of the Final SEIS and in Appendix B, UDA.
- 6/7. Chapter 5 of the Final SEIS includes a discussion on the short-and long-term impact of displacement. As stated under the Relocation section, mitigation measures on displaced businesses include:

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- To phase redevelopment to minimize disruptions.
- To ensure that families and businesses are, to the extent practicable, properly relocated before permitting their displacement by new development, redevelopment or neighborhood rehabilitation.
- To return as many persons and businesses displaced by government actions back to the Mauka Area.
- To provide opportunities for persons and businesses displaced by government action to avoid major financial loss.
- To minimize or ameliorate any serious negative impacts on displacees, such as loss of employment or business, imminent loss of shelter, and monetary losses.
- To provide counseling, information and referral services to displacees affected by private sector actions, induced or stimulated by governmental planning decisions.

- **3.12 Social and Economic Characteristics:**

- 1/2. Your comment that despite the poor street conditions business owners would generally prefer to stay in Central Kakaako is noted. We also acknowledge your comment that despite the poor street conditions, businesses have survived primarily because people need services that are convenient and centrally located.
3. We agree that businesses want to be located on land they own or lease at a reasonable rate and that is in a convenient location.

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- **3.12.2 Potential Impacts and Mitigation Measures:**
  1. Comment noted.
  2. Comment noted.
  3. The statement from the DSEIS should read, "...these jobs are likely to shift to other areas of the island rather than and disappear altogether..." The corrected sentence shall be incorporated into the Final SEIS.
  4. The Draft SEIS has demonstrated the anticipated impacts to the built, natural, and social environments.
  5. It is not anticipated that the implementation of the Draft Mauka Area Plan, which would take place over a 25-30 year period, would cause a massive relocation due to displacement, loss of jobs, businesses, and homes. The measures to assist persons and businesses in the event of displacement for reasons ranging from natural disaster to public and/or private project are proposed to mitigate the necessary transition from the existing predicament to being properly situated.
- **Water Quality:**
  1. The assessment of typical construction and dewatering pollutants (sediments, oil and debris) will be required of individual specific projects based on work-specific equipment and methodology, and nature of the activities involved. Each individual applicant for a City Building Permit for development or redevelopment within the Mauka Area will be required to address storm water quality requirements for their specific project in accordance with Section II of the City's "Rules Relating to Storm Drainage Standards." Depending on the size of the anticipated disturbed area (at least 1 acre); State

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Department of Health National Pollutant Discharge Elimination System (“NPDES”) requirements may also apply for construction storm water. Dewatering activities would require an NPDES Permit regardless of project size.

2. Chapter 3.13 of the Final SEIS will include the potential impacts from dewatering.
3. Depending on the size of the anticipated disturbed area (at least 1 acre), State NPDES requirements would apply. Each qualifying construction project will be required to individually obtain an NPDES Permit for construction-related storm water discharges.
4. Treatment method(s) for water quality of dewatering effluent shall be conducted pursuant to City MS4 and/or State NPDES Permit requirements.
5. Estimated design storm water flows are determined from 3 main factors—the design size of the drainage area (from a bird’s-eye view), design intensity of rainfall event, and the impermeable character of the area. The first 2 factors are constant, while the third will not change substantially with a projection to the year 2030 by developments and redevelopments. This is because the existing condition is relatively built-out and identified parks are to remain to the year 2030. Vertical development, which increases cumulative floor area but not bird’s-eye view area, does not impact design quantities of storm water runoff since it does not change drainage area or the impermeable character of the ground.
6. The Draft Mauka Area Plan is a 25-30 year plan for the Kakaako Community Development District Infrastructure systems are designed to accommodate

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full-development as it would be cost prohibitive and disruptive to area businesses to incrementally develop infrastructure systems. Chapter 3.13 of the Final SEIS discloses impacts of future IDs.

- **Sanitary Sewer System:**

1. The total estimated cost for replacement of the sewer system is \$49.5 million. In the past, approximately 90% of the cost has come from the State and 10% from private landowners who benefit from the system. Information on ID project funding is provided in Chapter 3.13 of the Final SEIS.
2. "Downstream facilities" pertain to any structure, utility or process down flow of the subject area.
- 3/4. The current City sewer model (INFLIX) and City wastewater studies are referenced. Future design flows were estimated and compared to the planned improvements to increase facility pumping capacity for the Ala Moana WWPS and the ongoing construction improvements to the treatment capacity for the Sand Island WWTP. This will be clarified in Chapter 3.13 of the FSEIS. Also, the existing sewer system and its capacity are analyzed in the infrastructure plan, which will be included as part of the FSEIS as Appendix E.

- **4.2.1 Hawaii State Plan:**

- *§226-5.b.1, 2, 3, 4 Population:*

Chapter 4 of the Final SEIS shall include a clarification on how the Draft Mauka Area Plan meets this requirement. The Mauka Area is situated in the Primary Urban Center, which has been designated as a region by the City and County of Honolulu to take on a substantial share of

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Oahu's present and future growth. HCDA along with private landowners encourages research activities and enhances public awareness programs to foster an understanding of Hawaii's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaii's population through our public information program and website.

➤ *§226-6.b.2 Economy – In General:*

Chapter 4 of the Final SEIS shall include a clarification on how the Draft Mauka Area Plan meets this requirement. The Draft Mauka Area Plan fosters Smart Growth planning concepts to reduce dependence on automobile travel and encouraging creative mix of industrial, residential, and commercial uses in the Mauka Area will strengthen the desirability of the Mauka Area as a place to live, work, and play. For example, the Ward Entertainment Center (restaurants, shops, theaters), developed under the Mauka Area Plan, has successfully proven to be for Hawaii's working population and families. The destination promotes Hawaii as attractive market for environmentally and socially sound investment activities that benefit Hawaii's people.

➤ *§226-11.b.2, 3, 8 Physical Environment:*

The premise of urban "infill" development is to accommodate growth in an already heavily urbanized area, whereby other areas that are rural or agriculture in nature can be saved from urban expansion. Redeveloping areas that are already near existing infrastructure will save the cost of extending infrastructure to areas where it does not currently exist.

➤ *§226-12.b.1, 3, 4, 5 Physical Environment – Scenic, Natural Beauty, and Historic Resources & §226-13.b.2, 3,*

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*5, 6, 7. Physical Environment – Land, Air, and Water Quality:*

As stated above, the Draft Mauka Area Plan is based on the concept of infill development within an already dense urban area. We believe that urban form provisions mitigate the impact on panoramic views. In addition, development provisions are geared towards promoting active uses and pedestrian-scaled building forms at the street level.

➤ *§226-19.b.1, 2, 3, 5, 6. Socio-Cultural Advancement – Housing:*

Chapter 4 of the Final SEIS shall include a clarification on how the Draft Mauka Area Plan meets this requirement. Existing land uses in the Mauka Area are predominantly a mix of commercial and industrial. In 1980, there were approximately 1,100 residences in Kakaako, concentrated mostly in the Sheridan Tract area. The existing Mauka Area Rules provides provisions for the rehabilitation and maintenance of existing home units, specifically in the Sheridan Tract area. We anticipate no changes to the Sheridan Tract area.

• **5.1 Relationship Between Local Short-Term Uses of the Environment and the Maintenance of Long-Term Productivity:**

1. The Chapter 3 of the Final SEIS and the UDA provides a visual analysis of the impacts on views.
2. The HCDA is unaware of a Kakaako Citizen's Plan. We are aware that community groups have prepared a development plan for the Makai Area, not the Mauka Area.

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Planning for the Mauka Area was initiated in 2005 with a comprehensive review and revision of the existing Mauka Area Plan and Rules. Through and extensive stakeholder and public input process (focus groups, community meetings, advisory committee meetings, and presentations to the Authority), a revised Mauka Area Plan and Rules was developed that fulfills the objectives of 206E, HRS in planning for a high-quality urban community that promotes positive economic development, preserves Honolulu's diverse cultural heritage and is working toward best practices in energy and environmental sustainability.

3. The original EIS for the Mauka Area Plan assessed the following three alternatives:
  - No Action alternative. Develop Kakaako in accordance with the City zoning and land use plans.
  - Alternative 1. Unify residential community by locating commercial and residential districts in contiguous blocks.
  - Alternative 2. Utilize a mixed-use zoning concept where commercial, residential and industrial uses could occupy the same parcel or building.

These alternatives are still valid alternatives under the subject SEIS. In addition, in response to comments received through the Draft SEIS from Kakaako stakeholders and landowners, a third alternative analysis was developed to assess alternatives to the reduction in footprint and height. The third alternative analysis is provided in the Chapter 2.14.3 of the Final SEIS.

Ms. Donna Wong, Executive Director  
Page Thirty Nine  
May 6, 2009

4. The HCDA is unaware of a Kakaako Citizen's Plan for the Mauka Area. We are aware that community groups have prepared a development plan for the Makai Area.
- 5/6. The Transportation Analysis of the DSEIS assessed the proposed transportation plan affecting the Mauka Area and the area situated on its periphery. Regional traffic was taken into account through projections provided by the Oahu Metropolitan Planning Organization.

- **Cumulative and Secondary Impacts:**

- 1/2. The 'action' for the subject SEIS is to assess proposed revisions to the Mauka Area Plan. Revisions to the Mauka Area Plan include proposed changes to the land use, urban design, parks, open space, views, transportation, reserved housing and infrastructure plan. Inasmuch as information for all future Mauka Area projects is unavailable at this time, certain projections have been made to be able to assess impacts for the 20-30 year assessment period. We believe that the proposed revisions to the Mauka Area Plan have been fully assessed in the Final SEIS.
3. Pursuant to Chapter 343-5, HRS private development projects would not be required to prepare an environmental assessment or environmental impact statement. Projects on State land or use of State funds will be required to fulfill Chapter 343 requirements, including infrastructure improvements.
4. The Final SEIS will include the Transportation Analysis (Appendix C), the UDA (Appendix B), a Cultural Impact Assessment (Appendix D) and Infrastructure Plan (E).

Ms. Donna Wong, Executive Director  
Page Forty  
May 6, 2009

- **Impacts on the Human Environment:**

- 1/2. The Cultural Impact Assessment (Appendix D) includes information of all known burials within the Mauka Area. The CIA discloses extensive burials throughout the Mauka Area; therefore, procedures have been established, in coordination with the SHPD, to ensure that archaeological resources are protected.
3. The Cultural Impact Assessment (Appendix D) discloses the impacts of the Draft Mauka Area Plan and provides mitigation measures on the cumulative impacts of the infrastructure and development scenario on cultural resources with the District.
4. The Cultural Impact Assessment (Appendix D) includes information of all known burials within the Mauka Area.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



737 Bishop Street  
Mauka Tower, Suite 2750  
Honolulu, Hawaii 96813  
Office 808 585-7900  
Fax 808 585-7910

August 19, 2008

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moana Blvd. Suite 1001  
Honolulu, HI 96813

Re: Comments on Draft Supplemental Environmental Impact Statement ("DSEIS")

Thank you for this opportunity to submit comments on the *draft Supplemental Environmental Impact Statement ("DSEIS")*. We request that the Hawaii Community Development Authority ("HCDA") reconsider the following recommendations of the DSEIS:

1. Page 22. The Building Tower Element Max Height limit should remain at 400 feet along Ala Moana Boulevard.
2. Page 22. Building Tower Element Max Footprint sizes should remain as they are, reaching upwards of 16,000 square feet depending on existing lot capacity rules.
3. The Street-front Element Minimum Height should not be fixed at the greater of 40 feet or four stories but should be flexible depending on other building forms on the parcel or block.
4. Auahi Street should be opened immediately between Koula Street and Kamani Street.

Collectively, these proposed rule changes could have substantial impacts on development within Kaka'ako, and HCDA should assess the impacts of these proposed rule changes before adopting such drastic changes. Our concerns with these changes include:

- Reductions in floor area will impair economic feasibility of new development and prevent or slow growth occurring in Kaka'ako.
- The cost constraints imposed by mid-height building forms that do not provide the revenue potential of tower elements could result in such product not being constructed, making it hard to achieve home production goals the State is seeking to achieve in the area.

The unintended consequence of these changes could be the equivalent of a slow growth initiative in an urban area with new infrastructure installed to facilitate growth.

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Steve Colon, President  
Hunt Development Group  
Mauka Tower, Suite 2750  
737 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Colon:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including:

- **Building Height and Floor Plates**

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as being in a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, it warrants a discretionary design review to ensure that any proposed tower elements are planned to enhance the urban design framework in the Mauka Area. The review process will study various aspects of the proposed development such as building configurations, height, orientation, and location. The guiding principles for the review process can be found in Section 3.10.2 of the Final SEIS and in Section 3.1 of the Urban Design Analysis ("UDA"), Appendix B.

Ms. Susan Trimm  
August 19, 2008  
Page 2 of 3

#### **Building Height and Floor Plates**

Reduced building height of 200 feet and floor plates of 9,000 square feet will reduce the ability to provide housing along Ala Moana Blvd by 50%. Reducing footprint sizes by 7,000 square feet is a 44% reduction. Taken together, the Plan is proposing potentially a 72% reduction in residential development capacity along Ala Moana, as is illustrated in the following table.

	Existing	Proposed	Loss	Loss
Floors	40	20	(20) floors	(50%)
Footprints	16,000 sf	9,000 sf	(7,000)sf	(44%)
Square feet	640,000 sf	180,000 sf	(460,000)sf	(72%)
Dwelling Unit estimate	640 du	180 du	(460)du	(72%)

Further, if developers are considering future office towers rather than residential, a necessary land use to create a "work, "live, play" environment in Kaka'ako, then the HCDA should address whether such small footprints can reasonably be built and economically supported. While such construction is no doubt physically possible, the size constraints will inevitably increase construction costs and make future office uses infeasible.

Furthermore, lower density hampers building flexibility and the economic ability of a project to incorporate and/or pay for well-designed public benefits, such as streetscapes, reserved housing, and other community amenities. At a minimum, we recommend that an economic impact analysis be performed to evaluate the impact of these changes.

#### **40 Foot Street Front Elements**

The DSEIS proposes a substantial new requirement to the Street-front Element Minimum Height by mandating a 40 foot height where there appears to be no justification for such. In this format, it could be impossible to have courtyard areas opening to the street in certain areas. This could unnecessarily take away from the beauty and the variety of the area. Economically it could also reduce the value of the area by only allowing solid donut type buildings with no material openings or courtyard visages to the street.

#### **Auahi Street**

Connectivity and traffic management are keys to viable, healthy communities. As such, we strongly encourage that Auahi St. be opened-up between Koula St. and Kamani St. The lack of east-west flow and connectivity within the district is of great concern, and the DSEIS needs to include an adequate study of the traffic impacts of this closure when substantial new housing is added to the urban landscape both east and west of Ward Avenue.

Auahi street is designated a "Major Street" in the DSEIS and is a "feature" street in the General Growth ("GGP") Master Plan application. All other Major Streets connect to Collector or Arterial streets to enhance district circulation. Auahi is the only Major Street not treated as a Major Street. The DSEIS must address this circulation matter.

While Queen Street and Ala Moana Boulevard carry traffic around and beyond the district, many streets within the district are dead-ends. Under the GGP Master Plan Auahi Street becomes an urban promenade linking neighborhoods together. This is a major public gesture that should be extended throughout the district to maintain continuity and enhance pedestrian and vehicular connectivity. Opening Auahi St. is consistent with HCDA's vision as an emerging activity location.

Mr. Steve Colon, President  
Page Two  
May 6, 2009

The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA, Appendix B.

- **40 Foot Street Front Element**

We acknowledge your recommendation that the Street-front Element minimum height should not be fixed at the greater of 40 feet or four stories. The third alternative analysis proposes a Street-front Element range of 40 feet to 65 feet to maintain pedestrian-scaled developments. Urban Design analysis on structure heights for all three alternatives can be found in Section 3.10 of the Final SEIS.

- **Auahi Street**

We acknowledge your request to open Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha School properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

Ms. Susan Tamara  
August 19, 2008  
Page 3 of 3

The security impact of opening a Major Street like Auahi Street should also be considered. Opening it from Koula to Kamani only to pedestrian traffic creates a security risk in the evening, especially if older people end up buying homes in the area and have to walk. If they elect to avoid that security risk by driving, it puts more cars on the road using less through streets.

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

Sincerely,  
**HUNT DEVELOPMENT GROUP, LP.**



Steve Colón  
President – Hawaii Division

Mr. Steve Colon, President  
Page Three  
May 6, 2009

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

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Urban Land

## Comments on the Draft Supplemental Environmental Impact Statement

### Draft Mauka Area Plan



Submitted to  
Hawaii Community Development Authority  
Honolulu, Hawaii

by  
IBI Group on behalf of Kamehameha Schools  
August 21, 2008



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Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Vivian Tong  
IBI Group  
7360 Westminister Highway, Suite 130  
Richmond, British Columbia V6X1A1

Dear Ms. Tong:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your fax received on August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

- **Density**

Your recommendation that the Hawaii Community Development Authority ("HCDA") consider higher densities and density bonus programs as a key tool in funding public realm improvements and the development of valued public amenities needed for the development of a complete community is noted. The Draft Mauka Area Plan is considering bonus densities for providing reserved housing. In addition, future transit oriented developments within the Mauka Area may provide an opportunity to increase densities. As you have noted, our proposed building form provides an opportunity to accommodate additional density.

- **Building Height**

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design.

IBI Group has been asked by Kamehameha Schools to review the Kaka'ako Draft Mauka Area Plan and the Draft Supplemental Environmental Impact Statement (DSEIS) in regards to potential impacts on urban design and transportation.

IBI Group, an interdisciplinary consulting organization, is the North American industry leader in the design of high-rise residential and commercial towers, Transit-Oriented Development (TOD) planning and the integration of transportation and urban development. Based on this experience, IBI Group is well-positioned to understand the implications of the proposed policy framework and mitigation measures for the potential urban environment. From this perspective, we believe the draft Plan and the DSEIS are a firm step in the right direction. Collectively, the revised policies are, in our view, appropriate for the development of a new urban district that will contribute to the livability, identity, and improvement on the current adopted Mauka Area Plan and Rules.

Our comments are as follows:

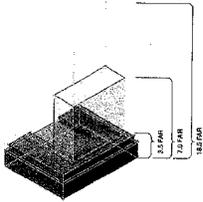
#### Density

The Draft Plan permits a maximum density of 3.5 FAR. Considering the plan goal of creating a pedestrian-oriented multi-modal urban community in the Kaka'ako Mauka Area and an environment where residents are able to live, work, and play in the context of urban Honolulu, the permitted densities are lower than what would typically be expected for a central urban district. Without sufficient density there is a substantially diminished opportunity to encourage redevelopment in an area where there is an existing stock of low-density buildings with established tenants, to support future light-rail plans, and to support a greater level of public amenities and a strong and diverse local business community. Further, it should be noted that without an increase in density, the building mass used in the DSEIS models, or the building envelope detailed in the development provisions, can not be achieved without densities well in excess of 3.5 (as illustrated in Figure 1).

IBI Group recommends the consideration of higher densities and density bonus programs as a key tool in funding public realm improvements and the development of valued public amenities needed for the development of a complete community in the Mauka Area and the mitigation of higher-density residential development for future residents.

#### Building Heights

A 400 foot maximum building height is reasonable considering the Mauka Area's location on the edge of the Honolulu CBD. However, we question the intent of restricting building heights to 200 feet along Ala Moana Boulevard between Punchbowl Street and Ward Avenue and Kamakee Street and Queen Lane. Although there is merit to the design approach of varying heights from the waterfront vantage point and seeking to design an appropriate skyline, it is our experience that the best approach is more nuanced than a simple progression of heights. Rather, design controls that enable variety and design flexibility while maintaining open view



**Figure 1:** this model shows the relationship between density (FAR) and the potential building envelope allowed by the proposed Mauka Area Plan development provisions. It is clear that the development provisions would allow a building greatly in excess of the 3.5 FAR. In fact, in this scenario, the 3.5 FAR would be consumed entirely by the mid-rise component.

Ms. Vivian Tong  
Page Two  
May 6, 2009

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.
- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

#### • Building Orientation

The third alternative analysis proposes length-to-width ratios of 1:4 (not to exceed) for residential buildings and 1:2 (not to exceed) for commercial buildings.

corridors and ensuring that a 'wall' of towers do not dominate the visual foreground are more appropriate. Further, HCDA could consider allowing for taller 'signature' towers (we would recommend allowing heights up to 500 feet), at key locations such as the intersections of major streets or to frame the corners of major parks.



**Figure 2:** Slender towers on shallow lots is a typical condition in Vancouver, British Columbia. Further, with the proper spacing and design review, view corridors have been maintained more successfully than with shorter, wider towers.

In regards to view protection, the reduced height does not provide an effective mitigation as described in the DSEIS. If building heights up to 400 feet are permitted on internal blocks, any view protection provided by the 200 foot limit along Ala Moana Boulevard is minimal. Further, there would be an opportunity to provide a strong presence and identity for the Mauka Area with taller signature buildings with slender profiles to minimize view impacts. A more effective mitigation for view impacts would be controls on tower widths and view corridor protections, or alternatively, a design review process that can better ensure view protection and a strong and aesthetically desirable urban skyline. Further, the 200 foot limit will only function to encourage shorter and wider buildings with greater impacts to views from street level and Waterfront Park.

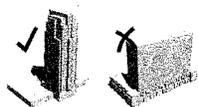
In regards to pedestrian environment, Ala Moana Boulevard is a major automobile corridor whose wider right-of-way can accommodate taller building elements without creating a 'canyon' effect that would be detrimental to the pedestrian environment. Potential impacts to the pedestrian environment can be further mitigated through vertical setbacks, as proposed in the Draft Plan.

Further, the heavier automobile use on Ala Moana Boulevard would support taller building heights that enable more future residents to locate on higher floors to minimize impacts from noise and emissions as well as maximize views to the ocean.

Finally, the DSEIS describes the shallow lot size conditions along Ala Moana Boulevard (250 to 275 feet deep) as a rationale for the 200 foot height maximum. It should be noted that a tall tower can be an effective building type for shallow lot sizes, more so than a wider mid-rise building. As a point of comparison, due to the rear lane network a typical Vancouver (British Columbia, Canada) parcel is approximately 150 feet deep and accommodates an internationally regarded urban form defined by tall and slender towers on broad pedestrian-oriented podiums (Figure 2). Employing contemporary high-rise typologies will not require lot consolidation as described in the DSEIS.

#### Building Orientation

Ensuring that new tower elements locate the longer façade along the Mauka-Makai view corridor is well-advised. However, we are concerned about the requirement for a 3:1 length-to-width ratio. Requiring such a specific length-to-width ratio is a significant restriction on building design without any rationale provided for that specific ratio. We recommend rephrasing the ratio to be a maximum length-to-width ratio for tower elements of 3:1 to restrict awkward building masses and employing other techniques to encourage slender building profiles in the Mauka-Makai view corridors (Figure 3).



**Figure 3:** Requiring buildings with a 3:1 length-to-width ratio creates less desirable visual impacts than other approaches to tower design

#### Streetfront Elements

The Draft Plan as detailed in the DSEIS includes a minimum height provision of 4 stories or 40 feet (whichever is greater) for the streetfront element. IBI Group supports the use of minimum height standards to ensure effective and consistent urban redevelopment and provide strong streetwalls (in combination with maximum

3

Ms. Vivian Tong  
Page Three  
May 6, 2009

- **Street Front Element**

We acknowledge your recommendation to use a single measure and revise the minimum requirement to 25 feet and not specifying a minimum number of stories.

- **Tower Footprint Size**

The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10 of the Final SEIS and in Appendix B, UDA.

- **Street Network**

We acknowledge your concerns regarding the closing of Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the adjacent Civic District. For traffic circulation purposes, Pohukaina-Auahi Street better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools' properties. Assessment on the traffic analysis for the roadway plan can be found in Section 3.7 of the Final SEIS and in Section 5 of the Transportation Analysis, Appendix C.

- **Transportation Modeling**

With regard to the Transportation Analysis' conservative approach in determining mode shift, the specific mode shifts attributable to each project will largely depend on detailed site

building setbacks). However, a strict minimum height requirement will result in overly uniform building podiums without the variety and diversity expected of authentic urban neighborhoods. As well, the four story/40 foot limit is too high as a minimum level to ensure a pedestrian-friendly streetwall, particularly for narrower streets.

In contrast, to mitigate for the impacts of higher-density urban development on the pedestrian environment, we recommend using a single measure and revising the minimum requirement to 25 feet. By not specifying a minimum number of stories, the Draft Plan could enable taller commercial retail units or live/work spaces while retaining consistent streetwalls.

Further, it should be noted that by requiring a minimum height of 4 stories or 40 feet in combination with the 3.5 FAR will strongly encourage the creation of shorter and wider buildings with insufficient density remaining for any tower elements. This condition is clearly not anticipated in the DSEIS.

#### Building Floorplate Sizes

The Draft Plan restricts lower floorplates to 9,000 square feet. We strongly endorse the use of slender towers to accommodate urban development and provide livable urban neighborhoods in balance with view corridor protection and solar access at the street level. However, the 9,000 square foot maximum restricts flexibility without necessarily minimizing view impacts. A well-designed tower that is carefully placed in relation to surrounding towers and major view corridors can meet the plan objectives equally well. Further, by allowing larger floorplates (particularly for office commercial development which typically employs larger floorplate sizes), more density can be accommodated in fewer towers. Finally, since office commercial uses typically require a larger floorplate, the proposed restriction, which impacts buildings in the MUZ-Commercial zone will act as a disincentive for office development with a negative impact on the desired land use pattern balanced between residential and employment-oriented uses.

A key element that has not been considered in the preparation of the Draft Plan and the DSEIS is that a 9,000 square foot floorplate or smaller tower is not an efficient building technique as long as Hawaii building codes require separate stairwells. Without being able to use interlocking or 'scissor' stairs in a central core, floorplates need to be wider to accommodate a financially viable number of units. It is strongly recommended that the State and HCDA consider reviewing the building code to enable these contemporary design techniques. It should be noted that this approach has been adopted and tested in other jurisdictions in the US and Canada and there has been no evidence that the centralized stairwells compromise life safety. Furthermore, the skyline of Vancouver, BC considered as a model of contemporary west coast urbanism, is defined by these slender towers built on the scissor stairs model, enabling high density urban development while maintaining a high degree of livability, sustainability, access to views and sunlight, and urban design excellence. This model has been adopted in US cities including Portland, Oregon where the slender and tall tower is gaining substantial market acceptance and popularity.

Ms. Vivian Tong  
Page Four  
May 6, 2009

plans and the presence or lack of travel demand management measures that can affect travel choice and behavior. Without this information, it is difficult to estimate the expected mode shift. Given these considerations, a conservative approach was taken in estimating travel behavior.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Deepak Neupane  
Director of Planning and Development

DN/ST:ak  
c: EDAW, Inc.

### Street Network

The goals of creating a pedestrian-friendly urban form and street patterns that create a network and alternate travel routes throughout the District are fundamental to smart growth and TOD approaches to urban development. However, we note the questionable disconnection of Auahi Street as counter to these plan objectives. Although this street segment is in private ownership, the street would be easy to reopen to public traffic and should be considered as an important link in the Mauka Area street network. Further, as the segment west of the disconnect is identified as a promenade sidewalk, the discontinuation of Auahi Street to Ward Avenue appears strongly ill-advised as it would significantly deter from the pedestrian experience of the promenade sidewalk.

Further concerns about the closing of Auahi Street include the need to access new development within the block without adversely impacting traffic on the important automobile through streets of Ala Moana Boulevard and Pohukaina Street. Auahi Street would also provide a valuable alternate route through this area, providing LOS improvements on surrounding streets.

### Transportation Modeling

At a general level, the methodology for the traffic impact assessments is, by our review, sound and comprehensive. However, we have identified two concerns. The analysis, as identified in the report, employs a conservative approach and assumes no mode shift between the baseline and preferred scenario. This conservative approach has the effect of overestimating vehicle usage and underestimating shifts to other modes, including transit, cycling or walking. This type of conservative approach is standard when the priority and emphasis is placed on ensuring that automobile level-of-service is not adversely affected by development but is counter to the TOD approach and philosophy that seeks to balance transportation choices.

Remodeling traffic impacts on a complete road network (including Auahi Street) and reflecting a mode split that is more consistent with the Mauka Area's central location and good transit access would provide a more accurate picture of future traffic conditions and alter the mitigations required.

### Summary

In summary, IBI Group believes that a revised Mauka Area Plan that addresses the above concerns will provide HCDA with the proper tools for the development of a vibrant and attractive complete community reflective of an urban Honolulu context. In this spirit, we recommend reconsideration of the above issues in the Draft Mauka Area Plan and would advise that the mitigations for views, urban form impacts, and mobility identified in the DSEIS be revised to better address potential impacts caused by the above issues. Without reconsideration of these mitigations, we believe that the Draft Plan and DSEIS will fail to properly measure the potential for and impact of development in the Mauka Area.

IBI Group appreciates the opportunity to comment on the Draft Mauka Area Plan and DSEIS. Should you have any questions regarding the above comments, please contact Neal LaMontagne AICP MCIP at 604 232-1100 (x32) or [nlamontagne@ibigroup.com](mailto:nlamontagne@ibigroup.com).

**Island Pool & Spa Supply**

1169 Kona Street  
 Honolulu, Hawaii 96814  
 Phone: (808) 593-8448 FAX: (808) 593-8449

August 20, 2008

EDAW Inc  
 841 Bishop Street, Suite 1910  
 Honolulu, HI 96813

Attention: Mr. Kevin Butterbaugh

Re: Draft Supplement Environmental Impact Statement  
 Revision to the Kaka'ako Mauka Area Plan and Rules

Dear Mr. Butterbaugh:

This letter has been submitted to address the Supplemental Environmental Impact Statement (SEIS) for the Kaka'ako Mauka Area Plan Revised (KMAPR) and addresses the limited information provided by the DSEIS in regards to transit oriented development along Kona Street in Kaka'ako Mauka and the lack of alternatives facing business and land owners in the area.

Of course, every small business and land owner is concerned about their future in Kaka'ako and we echo many of those fears. For Kona Street especially, there are many variables that will play into the development of Kaka'ako Mauka that have not been determined, mitigated or communicated to the community.

There are many unresolved concerns as to the details of the KMAPR and DSEIS including the overall lack of adherence to the HCDA mandate that ensures the permitting and encouragement of light industrial use. §206E-33 states;

*"Existing and future industrial uses shall be permitted and encouraged in appropriate locations within the district. No plan or implementation strategy shall prevent continued activity or redevelopment of industrial and commercial uses which meet reasonable performance standards;"*

The DSEIS makes very little mention of protecting light industrial areas and small businesses. In fact, a passage in the DSEIS makes clear how little attention was paid.

*"Over time, the absence of growth in the light industrial sector may result in a gradual decline in light industrial uses. Consequently, these industries, such as manufacturing and warehousing may be shifted towards parts of Honolulu with lower rents and more space to accommodate their functions. Because these jobs are likely to shift to other areas of the island or disappear altogether, these impacts are anticipated to be less than significant; therefore no mitigation measures are proposed"*

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HAWAII COMMUNITY  
 DEVELOPMENT AUTHORITY



Linda Lingle  
 Governor

Jonathan W. Y. Lai  
 Chairperson

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Jim Frierson  
 Island Pool and Spa  
 1169 Kona Street  
 Honolulu, Hawaii 96814

Dear Mr. Frierson:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
 Kakaako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We acknowledge your concerns regarding your future in Kakaako. A key concept of the Draft Mauka Area Plan is to support the small-lot, mixed-use pattern of Central Kakaako. As you are aware, over the past two years, we have been working with Central Kakaako landowners in identifying and addressing key issues and concerns affecting Central Kakaako businesses. Concerns you raise include:

- **Property Taxes**

Chapter 3.12 of the Final SEIS will include a discussion on retaining existing landowners and businesses in the Mauka Area. We would like to note that the rise in property taxes and its impact on property owners are not limited to Kakaako; it is a State-wide issue. However, in recent months, property values have been declining due to the economic situation.

The Draft Mauka Area Plan proposes a strategy to support the viability of small business use while allowing for potential future re-use of small properties through selective improvements to streets and parking.

The aforementioned passage is enough to scare any Kaka'ako small business or land owner, but our concerns are justified, and a detailed understanding of how Kona Street will be affected by both transit and other development will be vital to those business and landowners who rightfully want to stay in Kaka'ako.

The following is a short list of concerns that need more clarification.

**Property Taxes:** The DSEIS realizes the fact that the central location, ongoing and future development of the Mauka Area would likely continue to command increased rents and sale prices. It mentions that the property values will be increased and will thus result in increased property taxes. It also clearly states, "This would cause a negative impact by displacing those property owners and/or tenants that found the increased property taxation too burdensome." The relocation proposal in the DSEIS proposes to return as many persons displaced by government actions back to the Mauka area, but for those who will be displaced due to increased property taxation, the only mitigation measure proposed is the relocation. Given the fact that most of the business owners want to stay in the same location in the future, the DSEIS has not explored any possibilities of retaining the landowners/businesses in the Mauka area.

**Assistance During Construction:** The DSEIS, in its 2.10.1 relocation proposal has proposed certain public assistance service short of money payments for households and business displaced by private sector actions, but has failed to provide details on how the relocation proposal will be implemented. It is unclear about who will be providing the relocation assistance- HCDA relocation assistance office, state or county?

It does not mention about where the households and businesses will be relocated and even if they are relocated the DSEIS does not mention the kinds of business opportunities available in the new area.

The DSEIS also mentions about providing opportunities for persons displaced by government action to avoid major financial loss, but is unclear on what kind of opportunities will be provided and who will be providing those opportunities.

**Reduced business-front parking:** Most of the central businesses in central Kaka'ako consist of front yards used as parking for the industrial uses. Major concern for the industrial businesses is that the removal of front yard parking in the name of Improvement District Project would have an adverse impact on the businesses

**Transit:** Another crucial point where more information is essential surrounds transit. Since there have been two proposed transit routes through Kaka'ako Mauka we are concerned that SEIS and KMAPR has not provided alternative analysis that take different possible transit routes into consideration.

The DSEIS simply fails to address the potential impacts to small business and light industrial and we would be remiss if we did not press for more information and options. Furthermore, we ask that the acceptance of the DSEIS be delayed until these concerns have been addressed in a way that adheres to HCDA's mandate to preserve and encourage small business and light industrial.

Mr. Jim Frierson  
Page Two  
May 6, 2009

- **Assistance During Construction**

For HCDA projects including Improvement Districts and development of public facilities, HCDA provides public assistance. In the past, businesses were provided low-interest relocation loans and referrals on available sites for lease. Chapter 2 of the Final SEIS will expand on relocation assistance to the private sector.

- **Reduced Business-front Parking**

Your comment that most of the businesses in Central Kakaako use front yards for parking is noted. We are currently working with the Central Kakaako community on options for future improvements to the streets. We would like to clarify that most of the street parking within Kakaako are primarily with in the street rights-of-way, not private front yards as most non-conforming structures are built up to the property line.

- **Transit**

The High Capacity Transit System ("HCTS") is a City and County of Honolulu project. The City and County Department of Transportation Services is conducting a separate EIS on the HCTS. Alternative analysis, including transit routes, will be provided in the EIS for the HCTS.

Please be assured that we will work with Kakaako businesses and landowners in protecting the light industrial areas and small businesses that are committed to staying in and surviving the changes. We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Cling  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

We understand that certain types of change are not only inevitable but welcomed, yet we need to be sure that development plans truly reflect the values and history of Central Kaka'ako as well as protecting to those light industrial areas and small businesses that are committed to staying in and surviving those changes.

Very truly yours,



Jim Frierson  
Island Pool & Spa Supply  
1169 Kona Street

cc: Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, HI 96813  
Attn: Susan Tamura

Sohn, Kristen

**From:** Susan J Tamura [Susan@hcdaweb.org]  
**Sent:** Monday, August 18, 2008 9:11 AM  
**To:** lilinoe@hcdaweb.org; Sohn, Kristen; Butterbaugh, Kevin  
**Subject:** Fw: Comments on the Draft SEIS Mauka Plan

"Paul Cool" <pd@johnchild.com>

To <susan@hcdaweb.org>

cc

Subject Comments on the Draft SEIS Mauka Plan

08/18/2008 08:51 AM

Please respond to  
 <pd@johnchild.com>

Aloha Susan:

Before the new Mauka Plan rules are finalized and adopted, I would encourage the consideration of the impacts on development feasibility associated with the reduction in building heights for properties along Ala Moana Boulevard and the reduction in size of the maximum floor plate from 16,000 square feet to 9,000 square feet.

Mahalo,

Paul D. Cool, MAI, CRE

John Child & Company

841 Bishop Street, Suite 2300

Honolulu, Hawaii 96813

P 808.533.2951

F 808.523.7672

E pdc@johnchild.com

 Please consider the environment before printing this email.

8/19/2008



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 DEVELOPMENT AUTHORITY



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 Chairperson

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 www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Paul D. Cool  
 John Child & Company  
 841 Bishop Street, Suite 2300  
 Honolulu, Hawaii 96813

Dear Mr. Cool:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter sent via email on August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses your concerns and recommendations including:

#### Building Height and Floor Plate

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo

Mr. Paul D. Cool  
Page Two  
May 6, 2009

Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.

- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The third alternative analysis also provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development.

A description of the tower height and footprint analysis is provided in Section 3.10.2 of the Final SEIS. The alternatives analysis is also included in the Urban Design Analysis report as Appendix A of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

JOHNSON FAIN

12512-24

August 18, 2008

Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

ATTN: Susan Tamura

**Subject: Draft Supplemental Environmental Impact Statement  
Kaka'ako Community Development District Mauka Area Plan**

Dear Ms. Tamura:

We are pleased to have the opportunity to comment on the Kaka'ako Community Development District Draft Supplemental Environmental Impact Statement (DSEIS) dated July 2008, for the Hawaii Community Development Authority's (HCDA's) Kaka'ako District Draft Mauka Area Plan. We have several questions and comments on the Draft Plan and on the DSEIS findings.

We enthusiastically support the Kaka'ako District Draft Mauka Area Plan's objective of developing the district around Smart Growth concepts: pedestrian-friendly urban form, defined public spaces, multiple modes of transportation including bicycles and transit, connective street patterns, mixed-use, and a mix of housing opportunities. We are concerned, however, that some of the policies proposed in the Draft Mauka Plan may result in some outcomes that contradict the stated objectives.

**Streets and Circulation.** Strong connectivity between neighborhoods and districts is a central principle of Smart Growth. The Kaka'ako area has numerous streets that are discontinuous, especially in the Ewa-Diamond Head orientation (e.g., Haniwai, Halekauwila, Pohukaina, and Auahi Streets). The Mauka Area Plan should seek as many opportunities as possible to open up the street network to a more porous circulation system. Auahi Street in particular should be connected through at Ward Avenue in order to relieve traffic on the major avenues and boulevards.

A related circulation question is the discrepancies between the street typology shown in the Mauka Area Plan in Figure 7-2 Roadway Plan and open space classifications shown in Figure 6-1 Open Space Network. Some of the locations of "promenade sidewalks" are different in the two plans, in particular Ala Moana Boulevard. We are skeptical about the appropriateness of Ala Moana as a promenade, given the relatively high volumes of traffic it carries (see also comment on land use, below). Wide sidewalks may be desirable here, but the accompanying stepbacks along the Ala Moana frontage are inappropriate to the scale of the larger street.

**Land Use.** In §4.0 Land Use Plan of the proposed Mauka Area Plan, modifications are recommended to the allowable mix of uses in the MUZ-R zone, limiting non-residential development to 0.3 FAR. This does not favor the walkable streets characteristic of Smart Growth, which should be streetscapes that offer a mix of residential uses above neighborhood-friendly retail and service uses below, on streets that carry a volume of traffic that is supportive of pedestrian circulation.

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. David Alpaugh  
Johnson Fain  
1201 North Broadway  
Los Angeles, California 90012

Dear Mr. Alpaugh:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your letter dated August 18, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

- **Streets and Circulation**

We acknowledge your request to open Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the adjacent Civic District. For traffic circulation purposes, Pohukaina-Auahi Street better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools properties. Assessment on the traffic analysis for the roadway plan can be found in Section 3.7 of the Final SEIS and Section 5 of the Transportation Analysis, Appendix C.

Street typology shown in the Mauka Area Roadway Plan and the Open Space Network will be corrected to reflect consistent promenade streets. We acknowledge your skepticism about the appropriateness of Ala Moana as a promenade street. As you may be aware, Ala Moana Boulevard is a heavily traveled by

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Hawaii Community Development Authority  
August 18, 2008  
Page 2 of 3

**Building Heights.** The Draft Mauka Area Plan's manipulation of building heights is highly prescriptive, and the objective of protecting mauka-makai views as well as encouraging quality streets in the district might better be approached through performance criteria rather than through strict dimensional standards. The Kaka'ako mauka area has a diversity of block sizes and lot sizes and irregular lot configurations; drafting a "one size fits all" set of standards risks forcing inappropriate solutions on irregular sites. For example, some of the following issues raise questions about the general applicability of the standards:

**Streetfront Element.** The minimum height of 40 feet or four stories for streetfront development is too restrictive and may preclude the introduction of special uses or the adaptive reuse of existing structures, an important principle of Smart Growth and one that can give character to a neighborhood.

**Mid-Height Element.** In the absence of specific rules to locate the various heights within the 80 – 215 ft. height limit range, it is difficult to test the DSEIS's implied assertion in §3.11.2 that the maximum allowable floor-area ratio of 3.5 FAR can be accommodated in the "greater amount of floor area" within the Mid-Height Element as compared with the current rules' deck element and larger tower footprints. Moreover, as the setbacks for Mid-Height Element buildings are the same as the setbacks for the Tower Element, the resulting massing becomes restricted to the center of a block impeding the efficiency of parking layouts (especially on smaller blocks), or stepping back over lower structures with impacts on constructability. In combination with other setback and stepback requirements, the net result could be a "wedding cake" massing that limits uses and intensities and works against the objective of mixed use and housing diversity.

**Tower Element.** With setbacks the same for towers as for Mid-Height Element structures, there may be an inducement to "pile up" mid-height structures around a tower's base, resulting in bulky building mass that clutters the skyline and obstructs the important mauka-makai views.

**Tower Floor Plate Size.** Reducing maximum floor plate sizes from 16,000 square feet to 9,000 square feet (combined with the reduction in building height in key areas) will result in higher construction costs and may compromise the plan's intent to provide a diversity of housing opportunities. Additionally, reducing tower floor plates to a maximum of 9,000 square feet effectively eliminates any future office development as a potential use, constraining the district's ability to balance housing and employment.

**Matters Not Considered by the Plan.** There are several existing provisions in the current Mauka Area Rules that do not support the HCDA's objective of creating an "urban village" setting, and whose modification or removal should be considered in the Plan and evaluated in the SEIS. For example, it does not appear to us that the Draft Mauka Area Plan addresses the provision of the current Chapter 22 Mauka Area Rules Subchapter 5 §15-22-203(b)(1)D that establishes a *minimum* FAR on sites from which FAR has been transferred to neighboring sites under common ownership within the Kaka'ako District. This provision would seem to constrain

Mr. David Alpaugh  
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pedestrians and joggers. Ala Moana Boulevard connects Downtown Honolulu to Ala Moana Beach Park.

- **Land Use**

The MUZ-R zone is primarily a residential area comprised of small single-and-multi family housing types on fee simple lots. The area is also known in Hawaii as the Sheridan Tract area. While some building renovation and redevelopment does occur in this area, given the small lot and block size, we do not anticipate much change to occur in the stable development pattern. In community meetings conducted through the Mauka Area planning process, residents of the Sheridan Tract area expressed a preference to keep the area as a small-scale residential neighborhood, with additional consideration for pedestrian safety along the major streets.

- **Building Height**

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis proposes a Street-front Element range of 40 feet to 65 feet to maintain pedestrian-scaled developments. Urban Design analysis on structure heights for all three alternatives can be found in Section 3.10.2 of the Final SEIS and in the Urban Design Analysis ("UDA"), Appendix B.

- **Tower Floor Plate Size**

The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10 of the Final SEIS and in the UDA, Appendix B.

JOHNSON

Hawaii Community Development Authority  
August 18, 2008  
Page 3 of 3

opportunities for adaptive reuse of existing structures that may have historic, cultural, or other merit unless accompanied by more substantial development on the same site. We recommend that the minimum be removed, or that exceptions be made to allow for long-term adaptive reuse, in order to create the diversity of scale and use that characterize an "urban village." Similarly, Chapter 22 Mauka Area Rules Subchapter 3 §15-22-63.1 dealing with yards and setbacks imposes a suburban condition on street frontages and should be reconsidered in the context of creating an "urban village" with a lively street life, coordinating with street sections that identify appropriate sidewalk widths, and favoring instead a strong urban streetwall with appropriate uses to animate the streetscape.

Thank you for the opportunity to provide comments on the Kaka'ako District Draft Mauka Area Plan DSEIS. We look forward to HCDA's responses in the Final SEIS.

Sincerely,



David Alpaugh  
Associate Principal, Planning and Urban Design

Mr. David Alpaugh  
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May 6, 2009

- **Matters Not Considered by the Plan**

We will take your recommendation of revising the Mauka Area Rules for the purpose of creating an "urban village" into consideration when working on the revisions to the Mauka Area Rules, including Sections 15-22-203(b)(1)D pertaining to establishing a minimum floor area ratio ("FAR") on sites from which FAR has been transferred to neighboring sites under common ownership for Master Plans. With respect to Section 15-22-63.1 pertaining to Yards and Setback, the Draft Mauka Plan is proposing to revise setback requirements to be consistent with urban villages and promoting lively streets.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

## Kaka'ako Business and Landowners Association

P.O. BOX 898  
Honolulu, HI 96808  
Tel: (808) 597-1102 Fax: (808) 591-6634

EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

August 20, 2008

Attention: Mr. Kevin Butterbaugh  
Re: Draft Supplemental Environmental Impact Statement  
Revision to the Kaka'ako Mauka Area Plan and Rules

RECEIVED  
AUG 22 2008

Dear Mr. Butterbaugh,

This letter is being submitted on behalf of the Kaka'ako Business and Landowners Association (KBLA), a coalition of small business, and land owners who wish to preserve Kaka'ako's small businesses and light industrial community. It is the intent of KBLA to work closely with HCDA in ensuring that small business and light industrial remain a cornerstone of life in Kaka'ako Mauka. KBLA is fully aware of the vital role small business and light industrial plays in the life of Honolulu and calls attention to the timing and content of the Draft Supplemental Environmental Impact Statement (DSEIS) for the Revised Kaka'ako Mauka Plan

### Why Honolulu Needs Small Business and Light Industrial in Kaka'ako Mauka

The business community in Kaka'ako Mauka has been a fixture in Metro Honolulu for over a hundred years and has provided essential goods and services from auto repair to health services to customers around the island, particularly those 400,000 Oahu residents living in the metro Honolulu area. Further, Kaka'ako Mauka serves as an extension of Downtown, thus a vital component to the business climate in Honolulu. A recent survey conducted by Market Trends Hawai'i indicated the following:

- Nearly 1,500 hundred businesses call Kaka'ako Mauka home
- 769 businesses from 11 separate industries account for more than half of the total business population in Kaka'ako. See attachment A
- Businesses in Kaka'ako Mauka generate over \$2 billion annually accounting for 3.9% of the Honolulu's economy.
- Businesses in Kaka'ako Mauka employ over 16,000 Oahu residents comprising 3.7% of the total non-agricultural workforce on Oahu
- Almost 50% of businesses report "convenience" as a major advantage of being in Kaka'ako

The social and economic value of Kaka'ako businesses to Hawai'i is a primary reason why enabling legislation was crafted, to not only preserve, but to encourage small business and light industrial use in the Kaka'ako Mauka area. Hawai'i Revised Statute §206E-33 states quite simply:

**"Existing and future industrial uses shall be permitted and encouraged in appropriate locations within the district. No plan or implementation strategy shall prevent continued activity or redevelopment of industrial and commercial uses which meet reasonable performance standards;"**

### Issues with the Supplemental Environmental Impact Statement

We believe HCDA's mandate to preserve and encourage small business and light industrial is not reflected in the DSEIS for the Revised Mauka Plan. The brief comments on small business and light



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Dexter Okada  
Kakaako Business and  
Landowners Association  
P. O. Box 898  
Honolulu, Hawaii 96808

Dear Mr. Okada:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 20, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We acknowledge your comments on why Honolulu needs small business and light industrial in Kakaako Mauka. In response to concerns regarding the viability of small businesses and landownership of small lots in Central Kakaako, we are currently working with area businesses and landowners to develop a preferred vision that will help guide the future of Central Kakaako. Included in the development of the preferred vision, landowners and business owners developed a list of issues and constraints facing Central Kakaako. The information will be included in Chapter 3.11, Landholdings and Land Use, of the Final SEIS.

With respect to what the Draft SEIS does not address, we offer the following response.

- *Kakaako is close to sea level so dewatering will be a problem especially along the narrow streets where there are no area to pump to.* The need for dewatering will be determined on a project-by-project basis. Should dewatering be necessary, a storage tank may be used in-lieu of a dewatering pit.

industrial contained in the DSEIS are simply unsatisfactory and do not paint a clear picture of what small business and small property owners are faced with. Further, contradicting opinions in the DSEIS do not provide clarity on the role small business and light industrial will play in the future or how it will survive development.

- “The Draft Mauka Area Plan conceptualizes ... preserving existing uses (such as Central Kaka’ako).”
- “... regardless of the physical limitations, Central Kaka’ako property owners and business owners would generally prefer to stay where they are.”
- “Employment in the light industrial sector is likely to remain stable ...”

These three statements are contradicted by the statement in the mitigation measure.

**“Over time, the absence of growth in the light industrial sector may result in a gradual decline in light industrial uses. Consequently, these industries, such as manufacturing and warehousing may be shifted towards parts of Honolulu with lower rents and more space to accommodate their functions. Because these jobs are likely to shift to other areas of the island or disappear altogether, these impacts are anticipated to be less than significant; therefore no mitigation measures are proposed”**

Because there is no active plan to preserve and encourage small business and light industrial, KBLA is wary that HCDA will not be able to protect the “*little guy*”, thus leaving us vulnerable to development that is not sensitive to the history or positive impact small business and light industrial has on Honolulu.

In addition, the DSEIS indicates that the survival of light industrial during and after construction phase is at the very least a secondary consideration.

**“The trade-offs among these short-term impacts are the increase in employment and immediate economic benefits of construction-related activities.”**

Because of these comments it can be reasonably argued that there is no real effort to accommodate small business and light industrial and insinuates that jobs and businesses, some of which have been in Kaka’ako for over 60 years, are expendable and can be replaced for a temporary workforce that will eventually leave Kaka’ako.

Because there are inconsistencies between the enabling legislation and the intent and result of the DSEIS, KBLA fears it offers grounding for future challenges and continued turmoil.

What the D.S.E.I.S. Does Not Address

While HCDA has attempted to reach out to the Kaka’ako business community, many questions and concerns have yet to be answered in any meaningful way. The following is merely “the short list” of concerns that have yet to be addressed.

- Kaka’ako is close to sea level so dewatering will be a problem especially along the narrow streets where there are no area to pump to.
- “Pedestrian friendly” vs. “pedestrian safe” streets. Because of truck and container movement, Central Kaka’ako needs pedestrian safe streets that provide safe passage for pedestrians in the area, as oppose to pedestrian friendly streets that invite pedestrians into the area.

Mr. Dexter Okada  
Page Two  
May 6, 2009

- ‘Pedestrian friendly’ -vs.- ‘pedestrian safe’ streets. The Draft Mauka Area Plan proposes that, at a minimum, all streets in Kakaako be ‘pedestrian tolerant’. We envision the Central Kakaako area should be pedestrian tolerant where reasonably safe walking conditions, including continuous sidewalks and safe street crossings are provided. Tolerant environments provide pedestrian facilities, but include a very minimal level of accommodation.
- *Compacting of the ground in the older areas of Kakaako is not up to current standards. What mitigation measures are there to prevent structural damages to buildings due to settling of the ground?* Geotechnical consultation provides foundation design recommendations to minimize differential settlement and keep overall settlement within acceptable limits. It is anticipated that project developers will have a geotechnical consultant to perform site-specific soil explorations and develop recommendations based on field reconnaissance and laboratory testing of soil of each respective project site.
- *The DSEIS acknowledges the planned rail, but fails to mention the potential impacts, such as reduced road capacity which may alter the Draft SEIS traffic analysis and proposed street widths.* The High Capacity Transit System (“HCTS”) is a City and County of Honolulu project. The City and County Department of Transportation Services (“DTS”) has conducted a separate EIS on the HCTS. According to information on the transit alignment, it appears that the HCTS will reduce the ROW to one parking lane and travel lanes along the HCTS alignment will not be reduced.
- *Many areas have a ROW of only 40 feet. Some of the road designs require 50 feet, which will require taking property away.* We confirm that some ROW may be acquired for roadway improvements. We are currently working with area businesses and landowners to develop right-of-way configurations that would better serve the Central Kakaako area.

- Compacting of the ground in the older areas of Kaka'ako are not up to current standards. What mitigation measures are there to prevent structural damages to buildings due to settling of the ground?
- The DSEIS acknowledges the planned rail, but fails to mention the potential impacts, such as reduced road capacity which may alter the DSEIS traffic analysis and proposed street widths.
- Many areas have a ROW of only 40 feet. Some of the road designs require 50 feet which will require taking property away.
- Conventional sidewalks take away access to frontage of the small properties.
- Loss of parking.
- Property tax increases is on the mind of every small business and landowner. Small business and property owners have not been presented a clear picture of how their property taxes will increase nor have options to mitigate a tax increase been presented to the Kaka'ako business community.

In short, Property and business owners are still confused and very worried as to how development plans will affect their future in Kaka'ako.

Working Together

It is not KBLA's intent to thwart development of Kaka'ako Mauka, but given the role small business and light industrial in Kaka'ako plays in generating jobs, goods and services it would be in the best interest of both HCDA and the city to closely examine whether or not the DSEIS is premature and further input from small business and landowners needed.

No doubt, we, the membership of KBLA are worried and concerned that the future of Kaka'ako Mauka does not include small business and light industrial, but we also see this as an opportunity for KBLA and HCDA to discuss the issues surrounding development in Kaka'ako and work together in forming a comprehensive community benefits agreement that will allow old and new development to thrive and prosper together.

Sincerely,

*Dexter Okada*  
Dexter Okada  
D. Okada & Co., Ltd.

*Clifford J. Garcia*  
Clifford J. Garcia  
The Real Estate & Construction Co.

*R. W. Mardonald*  
R. W. Mardonald  
Sunmac Hawaii, Ltd.

*Charles D. Brand Senior Project Worker, Inc*

*Justin J. ...*  
Justin J. ...  
Pacific Focus Inc.

*Jim Freeman, Island Pool & SPA Supply*

cc: Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
Attention: Susan Tamura

*Chm K...*, Business Letter Services

Mr. Dexter Okada  
Page Three  
May 6, 2009

- *Conventional sidewalks take away access to frontage of the small properties and loss of parking.* We acknowledge that conventional sidewalks may impact access to frontage of the small properties. For majority of the Central Kakaako area, there are no street improvements, such as sidewalks, curbs and gutters. Businesses currently have full-frontage use of their property parking cars within the front yard and ROW area. Any street improvement will impact the use of the property frontage. A discussion on impacts of street improvements will be provided in Chapter 3.13.2, Infrastructure and Utilities, Potential Impacts and Mitigation Measures, of the Final SEIS.
- *Property tax increases.* As you are aware, property taxes are regulated and collected by the City and County of Honolulu and we do not have jurisdiction or control over real property taxes in the City and County of Honolulu. As with the rest of urban Honolulu, property taxes have risen within the past 10 years.

We appreciate your interest and participation in the environmental review process.

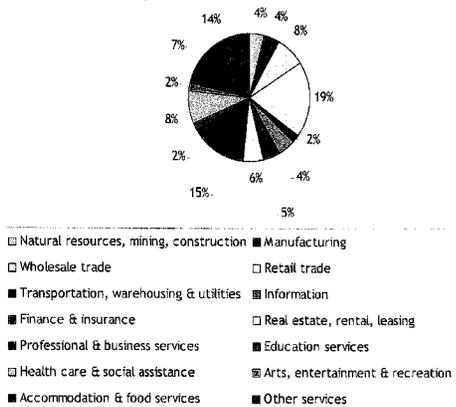
Sincerely,

*Anthony J. H. Chung*  
Anthony J. H. Chung  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

**Attachment A**

Number of Kaka'ako Mauka Businesses by NAICS Category





August 21, 2008

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moana Blvd. Suite 1001  
Honolulu, HI 96813

Re: Draft Supplemental Environmental Impact Statement

Dear Ms. Tamura:

I am writing on behalf of the Directors and members of the Kaka'ako Improvement Association (KIA) to express our concerns over the assessments provided in the DSEIS for the proposed Mauka Rule revisions.

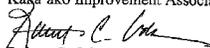
While the report is very technical it does not adequately address the residual negative impacts to small business owners/operators and landowners that will occur as a result of redevelopment in the Mauka district. In particular we are concerned with the following issues:

1. The SEIS acknowledges the planned rail, but does not mention the potential impacts such as reduced road capacity which should be factored into the traffic analysis and proposed street widths.
2. There should be some consideration of the potential positive impacts of rail through the district as it relates to reduced vehicular traffic into the district.
3. The future development of the Mauka district will include increased commercial traffic, including delivery and service vehicles, plus the anticipated increase of transient traffic in and out of the district. While the SEIS provides a very technical analysis of traffic flows related to increased development/density in the district, this does not provide the whole picture and the additional burden and hardships that will be imposed on small businesses.

The comment period provides a timeframe for response from all concerned parties but it is the opinion of the KIA that additional time is needed to properly address the concerns of small business and landowners that have not been sufficiently covered in the DSEIS.

Kaka'ako remains a very vibrant community of small business owners that provide essential services to a broad segment of the island's population. Their continued existence and ability to provide these essential services must be taken into consideration if we wish to maintain these core businesses as part of the HCDA's objectives of creating a vibrant and sustainable "live, work, play" community.

Thank you for allowing us the opportunity to respond to the DSEIS.

Sincerely,  
Kaka'ako Improvement Association  
  
Robert C. Oda  
It's President

P.O. Box 3776 Honolulu, Hawai'i 96812

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Robert Oda, President  
Kakaako Improvement Association  
P. O. Box 3776  
Honolulu, Hawaii 96812

Dear Mr. Oda:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii \_\_\_\_\_

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

- 1 & 2. Assessment of the Honolulu Rail Transit ("HRT") project is being conducted by the City and County of Honolulu. The EIS for the HRT project should include potential impacts such as reduced road capacity and street widths along the alignment route.
3. The full implementation of the Draft Mauka Area Plan over the next 25 to 30 years is expected to increase the number of automobiles. An increase in the number of automobiles on the roads is likely to affect residents, workers, and visitors in the Mauka Area alike. The Draft Mauka Area Plan proposes to reduce dependence on automobile travel within and through the Mauka Area by:
  - Developing urban village neighborhoods where people can live, work, shop, and recreate within their neighborhood.
  - Creating great places where people can congregate and recreate.

Mr. Robert Oda, President  
Page Two  
May 6, 2009

- Making the connections to ensure convenient access to a wide range of services and activities via walking, bicycling, and transit are provided.

We acknowledge that Kakaako small business owners provide essential services to a broad segment of the island's population. HCDA is committed to working with the small business owners to maintain these core services. We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



## KAMEHAMEHA SCHOOLS

8/22/2008

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moan Blvd, Suite 1001  
Honolulu, HI 96813

**Re: Comments on Draft Supplemental Environmental Impact Statement ("DSEIS")**

We appreciate this opportunity to submit comments on the *draft Supplemental Environmental Impact Statement* ("DSEIS"). Although the Draft Mauka Area Plan aims to create an ideal live, work, and play environment, collectively, the proposed rule changes may have substantial impacts on development within Kaka'ako, some of which have not adequately been justified. We respectfully request that the Hawaii Community Development Authority ("HCDA") consider the following recommendations:

**We Recommend An Economic Impact Analysis:**

The DSEIS briefly discusses potential population, housing, and job opportunities, but we strongly recommend that a thorough Economic Impact Analysis be completed prior to approval of the Draft Mauka Area Plan. The purpose would be to compare the economic impacts between the existing and proposed plans. In this way, the HCDA and the State can better understand the effects of these proposed changes on jobs, public benefits, income levels, affordable housing, land values, tax revenues, existing and future commercial uses, and whether the revised plan will contribute to the long-term economic viability of the area better than the existing plan.

Without a technical economic analysis, the planned changes unnecessarily risk diminishing the chances to the state for revitalization and growth in this important area.

**Section 2.4.2 Development Provisions:**

As a landowner, the proposed reduction in floor area and height along Ala Moana Boulevard appears to create undue significant hardships on the ability to achieve meaningful new growth and development on Kaka'ako lands. As a result, please consider the following:

1. Beautiful city views can be maintained and enhanced without reducing vertical development capacity by 50%. The Building Tower Element Max Height limit should remain at 400 feet along Ala Moana Boulevard. (Table 1 below.)
2. Beautiful city views can be maintained and enhanced without reducing horizontal development capacity by 44% district wide. Building Tower Element Max Footprint sizes should reflect building use; office towers necessitate larger footprints, residential buildings have a better chance of being built if there are beautiful city views. Thus, the existing Maximum Allowable Footprints quantity should remain as is. (Table 1 below.)

**Justification:**

**As related to Construction and Design:** To encourage a "live, work, and play" environment, the HCDA should thoroughly address the practicability of the proposed changes. HCDA should show the changes have a reasonable chance of being economically viable. Mere construction of the proposed 9,000 square foot is physically possible, but the constrained sizes likely means lower feasibility, less variety, zero to few office towers and slower revitalization and job growth except in the very best of economic times. Essentially, the already high construction costs will be much higher to recover from.

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Mike Dang, Director  
Planning & Development Endowment Group  
Kamehameha Schools  
567 South King Street, Suite 200  
Honolulu, Hawaii 96813

Dear Mr. Dang:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

• **We recommend an Economic Impact Analysis.**

We acknowledge your request for an economic model to ascertain if redevelopment feasibility and residual land values under the proposed redevelopment guidelines are sufficiently attractive to incentivize developers. An economic model for all parcels within the entire Mauka Area is unattainable as each development project has its respective project parameters. Financial parameters such as cost of equity, cost of debt, internal rate of return, and hurdle rate that are typically used in developing economic models for any real estate development can vary from one landowner to the next. It is not possible to develop an economic model that addresses the financial parameters of every landowner. At best, any economic model developed by the Hawaii Community Development Authority will have to be hypothetical in nature by necessity. We believe that the physical development parameters such as floor area ratio, tower footprint, and height, provide more meaningful information to the landowners regarding development potential of their land parcels than a hypothetical economic model.

As Related to Housing: As illustrated in the following table, the proposed changes are for a 50% reduction of tower height from 400 to 200 feet along Ala Moana Boulevard and for a 44% reduction of tower floor plates, of 7,000 square feet throughout Kaka'ako.

This could result in the HCDA's Draft Mauka Area Plan calling for a potential loss of approximately 72% of the market and affordable homes which could be generated from Ala Moana Boulevard projects.

	Current Density	Proposed Density	Loss	Loss (%)
Max Allowable Floors (assume 10' height per floor)	40	20	(20) floors	(50%)
Max Allowable Footprints	16,000 sf	9,000 sf	(7,000)sf	(44%)
Max Allowable Square feet	640,000 sf	180,000 sf	(460,000)sf	(72%)
Dwelling Unit (du) estimate	640 du	180 du	(460)du	(72%)

The plan risks precluding the very type of building forms that could generate the subsidy needed to offset the required reserved housing losses.

- The Street-front Element Minimum Height should not be fixed at the minimum 40 feet (Page 2-7).

*Justification:*

The height minimum requirement seems to call for undue form rigidity. It appears to effectively ban courtyards and pocket parks from opening to the street. It also seems to curtail certain other open space opportunities for the public.

**Section 2.6 Transportation Plan:**

- Auahi Street should be opened between Koula Street and Kamani Street.

*Justification:*

The Executive Summary of the DSEIS states that, "To integrate structures and their uses with adjoining streetscapes and maintain a pedestrian-oriented setting, large developments on super blocks, and associated street closures are discouraged" (pg. ES-1). Auahi Street is properly given the rank of a "Major Street" in the DSEIS. Its existing street closure unnecessarily restricts traffic circulation and the connectivity of streetscapes. If the primary goal of the Draft Mauka Area Plan is to encourage a viable and healthy community by integrating structures with uses and creating urban promenades linking neighborhoods, Auahi Street should be opened immediately.

Thank you for the opportunity to comment on the DSEIS.

Very truly yours,



Mike Dang  
Director of Planning & Development

Cc: Tony Ching  
Deepak Neupane

Mr. Mike Dang, Director  
Page Two  
May 6, 2009

• **Section 2.4.2 Development Provisions.**

A third alternative analysis pertaining to urban form was developed to assess recommendations received through public comments. In the third alternative, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area. The third alternative proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience of Oahu. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.
- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The proposed street-front element minimum height helps to set the appropriate relationship between building height and street width, and is also known as the "enclosure ratio." Many studies have been conducted to determine the best proportion of building height to street width to create an optimum "sense of place." It is not the intention in the Draft Mauka Area Plan to

Mr. Mike Dang, Director  
Page Three  
May 6, 2009

prevent pocket parks or courtyards. In both the draft Mauka Area Plan and the third alternative, small-size open spaces are strongly encouraged. The third alternative analysis proposes 40-65 foot high street-front element buildings.

We would like to clarify that the Draft Mauka Area Plan does not propose a reduction in floor area along Ala Moana Boulevard. The larger floor plates at the street and mid-height levels would be able to accommodate the existing and proposed 3.5 floor area ratio. The third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development.

The alternatives are presented in Chapter 2.14.3 of the Final SEIS and Appendix B, Urban Design Analysis (“UDA”).

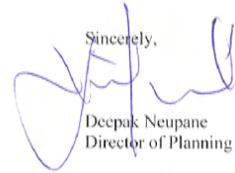
- **Section 2.6 Transportation Plan.**

We acknowledge your request to open Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha School properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

Mr. Mike Dang, Director  
Page Four  
May 6, 2009

We appreciate your interest and participation in the environmental review process.

Sincerely,



Deepak Neupane  
Director of Planning and Development

DN/ST:ak  
c: EDAW, Inc.

August 22, 2008

Hawaii Community Development Authority (HCDA)  
c/o Comments on the Draft SEIS Mauka Plan  
677 Ala Moana Blvd. Suite 1001  
Honolulu, Hawaii 96813

Attn: Ms. Susan Tamura, Planner, HCDA

I am pleased to submit the following comments after reviewing the Draft EIS Mauka Area Plan dated July 2008.

**Development Height Restrictions Along Ala Moana Blvd.**

I recognize that the visual assets of the Ala Moana Blvd. view corridors identified in the study are desirable elements to be preserved. However, the photographic studies included in the study do not sufficiently analyze differences in impacts between the 400 foot structures versus the 100-200 foot structures. The impacts of the 400 foot structures should also be studied in the Mauka-Makai configuration as recommended in the Draft Plan before any decision is to be made on reducing the maximum heights along the boulevard. The current touched-up photos only portray the 400 foot towers in the east-west configuration.

In consideration of development costs, due to requirements in fire protection and construction methods, construction and operational costs make it very infeasible for land owners and developers to produce new buildings between the ranges of 65-150 feet. If these buildings are to include "reserved units" or any type of affordable units, further diminishing feasibility will force these projects to be in the 300-400 foot range or no development will occur.

**Building Floor Plates**

The reduction of floor plates from 16,000 to 9,000 square feet has several construction-cost implications that will make development even more difficult for landowners and developers. The typical helix-type parking structure requires a width of 120 feet to function efficiently for up and down traffic. Being limited to a footprint of 9,000 square feet results in each level running a length of 75 feet maximum - or only 7-8 parking stalls. This is a major impact of footprint reduction which will make it very unattractive for landowners and developers to invest in any type of new building construction.

**40-65 Foot Height Requirements for Street Frontage**

The draft is unclear as to how this requirement works in conjunction with the Mid-Rise and Tower elements. It would be desirable to step the taller elements back from the street -- however, with 9,000 square foot limitations on the total building footprint, it is difficult to conceive of any efficient floor plan for the higher elements connected to the 40-65 foot high extrusions.

If the 40-65 foot high hardscape features are required for the entire street front, there will be a serious lack of green elements which can provide a much more desirable and soothing

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Sherman Wong  
c/o Kiewit Building Group  
55 Merchant Street, Suite 1500  
Honolulu, Hawaii 96813

Dear Mr. Wong:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter received via fax on August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including thing following

• **Height Restriction along Ala Moana Boulevard**

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as being in a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, it warrants a discretionary design review to ensure that any proposed tower elements are planned to enhance the urban design framework in the Mauka Area. The review process will study various aspects of the proposed development such as building configurations, height, orientation, and location. The guiding principles for the review process can be found in Section 3.1 of the UDA, Appendix B.

experience for the pedestrian. Green elements in front yards can also provide areas for innovative environmental solutions. Front yard areas can be utilized to treat for water quality and store non-potable water underground. Landscaping also assists in reducing the ambient heat or "heat-island" effect for both the pedestrians outside and the building occupants inside.

#### **Auahi Street Thoroughfare**

The areas with the greatest development potential exist within the two areas of Pauahi and Auahi. The East-West traffic links between these two areas are very important to ensure the success and vibrancy of these two lifestyle communities. Therefore, it is highly recommended that Auahi Street be open to traffic between the intersections at Ward Avenue and South Street. Due to the increase in residents and businesses proposed for the area, it is very important to establish stronger east-west connectivity within the communities and avoid the need to drive onto the major boulevards.

Besides the reconnecting of Auahi Street, there is a proposed extension of Pohukaina Street on both sides of Ward Ave. It is recommended there be more analysis of this scenario. The Pohukaina intersection with Ward Avenue will be very close to Auahi Street. If there is to be a more desirable traffic thoroughfare through the Pauahi area, it would be on the existing Auahi Street corridor rather than Pohukaina. Pohukaina Street will service the Mother Waldron Park and the Pohukaina Elementary School if it is to be recommissioned. Therefore Pohukaina Street should be treated in a fashion more similar to a lower-speed residential scale.

#### **Public Facilities – Parking**

The Draft Plan should consider the possibility of creating municipal parking or shared parking structures to promote walkability within the neighborhoods. If every large and small development is to provide its own parking, people will not be encouraged to walk from one local destination to another local destination. Especially for the smaller property owners, setting aside land area for parking or developing structured parking can be very cost-prohibitive. Therefore, if parking can be arranged on the community level and provided with other financing methods such as ID funding or shared infrastructure costs between multiple landowners, the cost burden can be drastically reduced for the individual landowners – therefore accelerating the build out of the community master plan.

Thank you for your consideration of my comments to the Kakaako Mauka Area Draft SEIS.

Aloha and Mahalo.



Sherman Wong, LEED-AP  
Honolulu Resident

Mr. Sherman Wong  
Page Two  
May 6, 2009

- **Building Floor Plates**

We note that parking is expected to be located within the Street Front element and not limited to the 9,000 square foot tower footprint. In addition, the third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA, Appendix B.

- **40-65 Foot Height Requirement for Street Frontage**

Proposed setbacks for the street-front element ranges from 5 feet to 0 feet from the property line, depending on the street type. The mid-height and tower elements are proposed to be set back 50 feet from a build-to line on Promenade Streets and 20 feet from build-to lines on other streets. The street-front element will not be contained to the 9,000 square foot tower footprint. Taller elements are proposed to be stepped back from the property line. A description of the urban design proposal is provided in Section 3.10.2 of the Final SEIS and in the UDA, Appendix B.

Green elements will be provided in the public right-of-way. The Draft Mauka Area Plan proposes tree-lined streets that will connect major parks within and outside of the district. Although green elements in front yards can provide for innovative environmental solutions; for urban environments, expansive front yards run counter to active urban streets.

- **Auahi Street**

The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to

Mr. Sherman Wong  
Page Three  
May 6, 2009

provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

- **Public Facilities – Parking**

We acknowledge your support of a parking program developed at the community level with other financing methods including improvement district funding and shared infrastructure costs.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

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August 13, 2008

Mr. Kevin Butterbaugh  
EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh,

I am writing on behalf of Limit, LLC in response to the Draft Mauka Area DSEIS. Limit, LLC owns and manages approximately 4.3 acres of warehouse space in Kakaako Mauka. For the most part, we feel that the new rules are positive measures and will help create and grow an urban village in Kaka'ako. However, there are two points in the plan that we feel are detrimental to the growth of our property "670 Auahi Street" and the surrounding areas of Kakaako Mauka.

1. **The recommendation that the building floor plates for structures over 200 feet be reduced from 16,000 square feet to 9,000 square feet.**

A reduction of 16,000 to 9,000 makes it very difficult for any large landowner interested in developing their land to find a financially feasible way to develop. A reduction from 16,000 to 9,000 equates to a 44% reduction of area per floor, and will have a significantly negative financial impact. If view planes are of concern, this can be alleviated by altering the orientation of the building rather than reducing the floor plate.

In the event that the new rules are adopted, we have considered creating twin towers. However, this is not a particularly desirable option due to the fact that twin towers lead to redundancies (multiple hot water heaters, water pumps, elevator shafts, basements, lobbies, etc.) and high energy consumption.

**We would like to ask that HCDA conduct an economic impact assessment to determine the impact this floor plate reduction will have on the developers and ultimately on the Kakaako Mauka community.** We say this because, if the landowners can not find a feasible way to develop, there will be no development in Kakaako under the new rules.

2. **The absence of Auahi Street connectivity after the intersection of Ward Avenue, heading west.**

The SEIS emphasizes the concern over traffic impacts from the growth of the Mauka area in the years to come. A simple solution would be to open up connectivity of Auahi Street after it crosses Ward Ave. Currently, Auahi Street is closed past the Ward Branch of Bank of Hawaii and is being used by DOT. In addition, GGP's plans to redevelop the Kakaako area, it shows Auahi Street closed. We feel that a very simple solution to help ease traffic problems as Kakaako grows is to open up Auahi Street to allow traffic flow from the Ward Villages to South Street.

Sincerely,

*Lisa Eveleth*

Lisa Eveleth  
Limit, LLC

LIMIT, LLC  
1330 ALA MOANA BLVD. #200  
HONOLULU, HI 96814



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Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Lisa Eveleth  
Limit, LLC  
1330 Ala Moana Boulevard, Apartment 200  
Honolulu, Hawaii 96814

Dear Ms. Eveleth:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 13, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including the following.

- **Building Floor Plates**

The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development. The alternatives are presented in the Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis.

- **Auahi Street**

The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic

Ms. Lisa Eveleth  
Page Two  
May 6, 2009

circulation purposes. Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools property. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



# MAKIKI CHRISTIAN CHURCH



August 20, 2008

EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attention: Mr. Kevin Butterbaugh

Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
Attention: Ms. Susan Tamura

**RE: Kakaako Community Development District, Draft Supplemental Environmental Impact Statement, Draft Mauka Area Plan, dated July 2008**

Dear Mr. Butterbaugh and Ms. Tamura:

Makiki Christian Church ("MCC") has reviewed the above-referenced Draft Supplemental Environmental Impact Statement ("DSEIS") and is writing this letter in order to submit the background information and comments set forth below.

## BACKGROUND INFORMATION

### A. Makiki Christian Church.

The mission work that resulted in Makiki Christian Church (MCC) was begun by the Rev. Takie Okumura in November, 1902 in the Makiki, Manoa, Kaimuki and Waikiki districts of Honolulu. Rev. Okumura had already served eight years as pastor at Honolulu Japanese Church (today Nuuanu Congregational Church). Within three months Rev. Okumura began holding regular meetings on the makai side of Kinau Street near Piikoi, using a shed with a capacity of thirty six, located in the corner of a Japanese camp.

On April 8, 1904 Rev. Okumura and his assistant Kametaro Maeda and 24 believers organized Makiki Christian Church, thereby joining a family of more than 100 Congregational Christian churches in Hawai'i (now the Hawai'i Conference of the United Church of Christ). MCC at its founding was comprised of first generation Japanese immigrants.

In 1905, Okumura's friend and philanthropist George P. Castle bought a 10,000 square-foot piece of property at the northeast corner of Kinau and Pensacola Streets to enable MCC to build a 400-seat sanctuary. Its first service was held in September 1906. Then in 1930 a new site containing 100,000 square feet of land was acquired at the corner of Pensacola and Elm Streets, six blocks

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Wayne Ibara, Senior Pastor  
Ms. Susan Nakaishi, Moderator  
Makiki Christian Church  
829 Pensacola Street  
Honolulu, Hawaii 96814

Dear Mr. Ibara and Ms. Nakaishi:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 20, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

We acknowledge that the statement from the Transit Oriented Community-based Development Project, Honolulu City Council, March 2008 is consistent with Makiki Christian Church's ("MCC") Christian mission and role as a member of the Ala Moana-Sheridan-Kaheka Community.

## Comments

### I. Roadway Network Changes

Your support of the two-way traffic on Pensacola Street north of Kapiolani Boulevard is acknowledged. We would like to note that the transportation analysis conducted for the Draft SEIS showed that turning Piikoi/Pensacola Streets into two-way streets with medians creates unacceptable level-of-service with respect to traffic flow. The decision on the final transportation plan will be ultimately determined through consultation with the City and County of Honolulu as well as the Kakaako community through the Mauka Area Plan amendment process.

makai of the old site. In the midst of the Great Depression a fund drive was successfully conducted in 1931 and on November 6, 1932 construction of the castle tower building was completed and dedicated.

The adjoining two-story social hall was dedicated in December 1936. The Christian Education Building (CE Building) was completed and dedicated on November 20, 1960.

On January 5, 1965 Makiki Christian Church Preschool opened its doors to 15 children. There are currently 12 teachers and aides teaching and caring for 88 children. The Preschool's mission is to provide a service to the community while being a witness for the church. The Preschool is accredited and State-licensed to enroll children from ages two through five. The Preschool is a part of the total program offered by Makiki Christian Church in its mission. It is governed by the Preschool Board of Makiki Christian Church and has been in operation for forty three years.

In 1983 under the guidance of the Japanese congregation's pastor, the Elderly Care ministry began. Hope Fellowship, as it is currently called, offers caregivers and those in the "sandwich generation" a brief respite while providing the house-bound elderly with some social stimulation and care. Offered on Wednesdays and Fridays, this program includes times of worship, the sharing of stories, crafts, simple stretching exercises, and a message of faith and hope. Lots of laughter and lively chatter can be heard between 9:00 to 11:30 a.m. from the 35-50 participants who gather in the Older Adults Room of the CE Building. The program is managed by volunteers who joyfully serve with their time and talents. Currently, the only cost to participating in the program is the \$3.00 lunch which is also prepared by teams of volunteer cooks.

Today Makiki Christian Church is guided by a Vision and Missional Strategy that recognizes the unique identity and role of the church in the world. MCC's history reflects its belief that God has called it to be concerned about its neighborhood and its neighbors. A quote from our Vision Portrait captures the church's commitment in this respect:

*"As a community of light, guided by the Word of God and by the Spirit, we are aware of both the visible and invisible realities of life. We therefore identify priorities that are often at odd with worldly values. Instead of being driven to compulsive efforts to save ourselves, we acknowledge that it is Christ who saves us. Rather than seeking worldly success at any price, we covenant together as followers of Jesus, called to do justice, to love kindness and to walk humbly with our God. So doing, God is able to use us gracefully as an instrument to accomplish divine purposes in the world. Like lasers that can slice steel or heal hearts, we are given light for the sake of the world, not just for ourselves."*

**B. The Ala Moana-Sheridan-Kaheka Community.**

MCC is located in an area covered by the Hawaii Community Development Authority ("HCDA") Draft Mauka Area Plan. MCC is also located in an area described as the "Ala Moana-Sheridan-Kaheka Community" in a recent study University of Hawaii at Manoa, Department of Urban and Regional Planning, study entitled Final Report and Quarterly Report No. 4 for Contract Entitled "Transit Oriented Community-based Development Project, Submitted

Mr. Wayne Ibara, Senior Pastor  
Ms. Susan Nakaishi, Moderator  
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May 6, 2009

Your suggestion of a traffic signal at a mid-block location along Pensacola Street will be noted in Section 3.7 of the Final SEIS as a possible measure to ensure pedestrian safety.

2. Housing for Lower Income Groups

The Draft Mauka Area Plan's Reserved Housing program targets the workforce or gap-group housing instead of the entire affordable spectrum. HCDA's focus will be to stimulate the production of housing for workforce buyers in the range of 100% to 140% of Area Median Income. As stated in the Draft SEIS, state agencies such as the Hawaii Housing & Finance Development Corporation ("HHFDC") are better equipped to address the need of developing housing for the lower income groups. HHFDC is the primary lead agency charged with overseeing affordable housing finance and development in Hawaii.

3. Potential Use of MCC Site

With regard to potential uses of MCC site, the Draft Mauka Area Plan's 'Preservation' designation applies to the historic sanctuary structure only. However, since the sanctuary structure is listed on the State Historic Register, the State Historic Preservation Division ("SHPD") would need to approve plans for the demolition and construction of any new structure on the project site. For example, Kawaiahao Church recently demolished the Likeke Hall, an ancillary church facility located adjacent to the historic sanctuary structure. Kawaiahao Church is in the process of constructing a new ancillary facility. Redevelopment plans for the new ancillary facility was developed in consultation with the SHPD.

We anticipate that redevelopment of the MCC property by demolishing its non-historic structures and replacing it with a

to the Honolulu City Council, March 31, 2008. One page 14, this report makes the following statement comments with respect to the Ala Moana-Sheridan-Kaheka Community:

Based on the results from the surveys and community meetings, the major theme that emerged is a "primary care village" with a strong desire by residents to age in place. This recognizes that the primary need in this community is to ensure that current and future elders will have access to affordable housing and health services. . . .

MCC believes that this statement is consistent with its Christian mission and its role as a member of the Ala Moana-Sheridan-Kaheka Community.

#### COMMENTS

In keeping with the above background information, MCC respectfully submits the following comments with respect to the DSEIS.

##### 1. Roadway Network Changes.

Section 2.6.1 of the DSEIS proposes to "Reinstitute two-way traffic on Pensacola Street north of Kapiolani Boulevard (two southbound lanes and one northbound lane) and install a planted median; . . ."

MCC strongly supports this change. However, MCC would also note that according to Table 2-9 there are three intersections where new traffic signals are being proposed. MCC believes that new traffic signals (or at least all-way stop signs) should be installed at the intersection of Pensacola Street and Rycroft Street in order to slow down the presently unimpeded traffic on Pensacola Street between King Street and Kapiolani Boulevard and thereby provide a truly "pedestrian supportive environment."

##### 2. Housing for Lower Income Groups.

In a letter dated January 15, 2008, contained in Appendix C the DSEIS, Henry Eng, FAICP, Director of the City and County of Honolulu Department of Planning and Permitting, states that:

. . . The DSEIS should discuss for the provision of affordable housing lower income groups, i.e., from below 80 percent (80%) of median income which would be beneficial to the elderly, young families, and the primarily service-oriented workforce.

The HCDA's reply dated July 2, 2008, also contained in Appendix C, states that:

The objective of HCDA's Reserved Housing Program is to provide housing for sale or rent to moderate income households, also known as workforce housing, that generally have incomes that are too high to qualify for market housing. Other state agencies, such as the Hawaii Housing Finance & Development Corporation,

Mr. Wayne Ibara, Senior Pastor  
Ms. Susan Nakaishi, Moderator  
Page Three  
May 6, 2009

new preschool, skilled nursing facility, elderly rental project and associated parking would be permitted under the new Mauka Area Plan and Rules. Under the existing Mauka Area Rules, licensed life care and skilled nursing facilities are permitted community service uses. We expect that under the new Mauka Area Rules, they will continue to be permitted. A skilled nursing facility would be considered a major health care service. Any redevelopment plans will need to be developed in consultation with the HCDA and SHPD.

In the past, HCDA has developed space for community facilities within State projects, using public facility funds. For private projects, a density bonus of up to .3 floor area ratio is allowed for community service uses such as nursing and assisted living facilities. The proposed land use designation for MCC is Mixed-use Zone Residential. The Proposed Land Use Plan will be revised to reflect the correct zoning designation.

##### 4. Community Benefits Agreements

We appreciate your suggestion of promoting community benefit agreements. We will look into the concept and its applicability for the Kakaako District.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

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specialize in affordable housing development and are better qualified in providing housing for the lower income groups.

Section 2.7.1 of the DSEIS states that “Mixed income communities broaden access to well-funded schools, strong municipal services, and emerging job centers.” Assuming that these statements are true under the Mauka Area Plan, MCC is unclear as to whether the lead State agency for the development of mixed income and mixed use projects in the Mauka Area which intend to serve such lower income groups should be the HCDA or the HHFDC.

### 3. Potential Uses of MCC Site.

Table 2-1 of the DSEIS indicates that the Proposed Action for MCC is “Preservation,” and that MCC is on the Hawaii Register of sites of historical or cultural significance. “Preservation” is defined as “keeping a property in its present condition.”

MCC’s property contains 2.189 acres or 95,335 square feet of land. Section 2.7.5 of the DSEIS states that projects that include residential use on lots of 20,000 square feet or more must set aside 20% of the residential floor area and develop it for reserved housing and that exemptions from gross floor area include “licensed life care facilities.”

Section 2.9.1 of the DSEIS states that “Efforts shall be made to provide appropriate and progressive child care and gerontology programs. To the extent possible, joint facilities shall be developed so that each group may benefit from its relationship with the other.”

Section 2.11.2 of the DSEIS states that “Additional major health care services such as hospitals and clinics are also not expected to be required. But minor health facilities such as doctors and dental offices are allowed in proximity to residents.”

MCC is unclear as to how the above items would be resolved under the DSEIS if MCC desired to redevelop its property by: (a) preserving its existing church building; (b) demolishing the other buildings on the property; and (c) replacing the demolished buildings with a new preschool, skilled nursing facility, and elderly rental housing project, along with an appropriate amount of parking.

Specifically, MCC is uncertain whether:

- (i) It needs to preserve any buildings other than its historic church building;
- (ii) “Licensed life care facilities” include a skilled nursing facility;
- (iii) A skilled nursing facility is a “major health care service” or a “minor health facility”; and
- (iv) How the HCDA intends to work with community organizations such as MCC to implement Section 2.9.1 in such situations.

Also, please confirm that the proposed land use designation for MCC is “Mixed-Use Zone Residential (MUZ-R)” as described on page 2-3 of the DSEIS and not “residential” as shown on Figure 2-1.

4. Community Benefits Agreements.

Section 2.9.1 of the DSEIS also states that “The social needs of the Mauka Area will largely be met by the provision of housing support facilities. The operation of these facilities should promote the well being of the residents by ensuring that: . . . Public funding assistance is secured for services to low-income and needy elderly households; . . .”

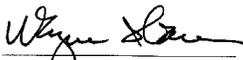
MCC has concerns about the availability and reliability of such public funding assistance and believes that the HCDA should consider promoting community benefits agreements (CBAs) in order to help community groups obtain needed community benefits from developers of major projects in the Mauka Area.

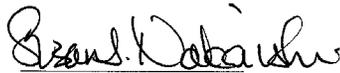
A CBA is generally an agreement negotiated between community groups and a developer (or sometimes state and local agencies) that requires the delivery of specific benefits to communities affected by a development project. Traditionally, decision-making in urban development projects has rested with the public and private sectors with little authority given to communities. The development of CBAs was a reaction to this imbalance and has helped local communities gain influence in the redevelopment process.

CBAs first appeared in Los Angeles in 2001 and have since taken root across the country in places such as Denver, Milwaukee, and New York City. Nationally, the combination of a real estate boom, urban redevelopment efforts, and a backlash against urban sprawl has converted some urban neighborhoods into development magnets, with the consequences of gentrification and the displacement of low-income residents. In this environment, communities have resisted development, or in the case of CBAs have conditioned development on the provision of housing and other economic benefits to current residents. One goal of CBAs which MCC supports is therefore the idea of “better neighborhoods, same neighbors,” which is also consistent with the idea of “aging in place.”

Thank you for the opportunity to submit our comments. Please do not hesitate to contact the undersigned should you have any questions.

Sincerely yours,

  
Wayne Ibara  
Senior Pastor

  
Susan Nakaishi  
Moderator



## NATIVE HAWAIIAN LEGAL CORPORATION

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August 22, 2008

EDAW Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attention: Mr. Kevin Butterbaugh

Re: Draft Supplemental Environmental Impact Statement for Draft Mauka Area Plan

Dear Mr. Butterbaugh,

I am writing with our organization's comments on the Archaeological and Historic Resources section of the SEIS for the Draft Mauka Area Plan. Our main concern is that the cultural historic resources in the mauka Kaka'ako area are assessed and reviewed at the earliest stage possible to ensure that those resources are adequately protected as well as to facilitate the appropriate development of the area.

### Concerns regarding the SEIS

In particular, we are concerned with section 3.5.2, "Potential Impacts and Mitigation Measures," which states on page 3-14, that "[o]ngoing and future development/redevelopment efforts resulting in excavation may result in the destruction or permanent burial of essentially all of the cultural remains encountered." Given that statement and the recent unfortunate events at the Ward Villages site, we are disappointed by the following language in your SEIS, also on page 3-14:

HCDA will encourage potential developers in the Kaka'ako Mauka Area to consult with the SHPD before preparing any development plans to familiarize themselves with the archaeological and cultural issues relating to the Mauka Area.

If any archaeological features are found during construction activities, all work must cease immediately and await SHPD's determination on how to proceed.

(Emphasis added).

*Encouraging* developers to consult with the SHPD prior to preparing development plans is entirely inadequate to protect these historic resources which are a part of the State's public trust. From the section cited above, it appears that the only time historic and archaeological review is triggered is either if the developer consults with the SHPD or when the archaeological sites are encountered during the construction process. As we saw in the Ward Villages situation, the failure to adequately assess at an early stage in the process the boundaries and extent of a burial site on a

*Services made possible with major funding from the Office of Hawaiian Affairs.*



Nihoa. Upright, straight, stately, tall and straight as a tree without branches; sharply peaked, as mountains. Fig., righteous, correct.



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Ref. No.: PL EIS 6.26

May 6, 2009

Camille K. Kalama, Esq.  
Staff Attorney  
Native Hawaiian Legal Corporation  
1164 Bishop Street, Suite 1205  
Honolulu, Hawaii 96813

Dear Ms. Kalama:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan.

We acknowledge your concerns regarding Section 3.5.2, Potential Impacts and Mitigation Measures, Archaeological Resources of the Draft SEIS. With regard to the potential for identifying the presence of subsurface archaeological and cultural sites, we have recently implemented a requirement that all developers and applicants consult with the State Historic Preservation Division ("SHPD") prior to submission of any plans for project eligibility. A letter of concurrence from the SHPD is required prior to acceptance of an application for project eligibility review. This policy has already been implemented for projects within the Mauka Area. A discussion on this policy can be found in Section 3.5.2 of the Final SEIS. In addition, we propose to formalize the SHPD review process in the Mauka Area Rules amendment process pursuant to Chapter 91, Hawaii Revised Statutes.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

Mr. Kevin Butterbaugh  
August 22, 2008

Page 2

particular property can result in expensive redesign plans and unnecessary desecration and disturbance of the historic properties. As such, your proposed mitigation plans leave out two important processes under which a review of the archaeological features and cultural resources in a project area should be required.

#### Statutory Duties of the HCDA

- 1) Pursuant to HRS section 6E-42, your agency is required to seek review and comment from the SHPD before approving any project involving a permit or other entitlement for use which may affect historic property or a burial site. Such review should be sought at the master plan level of a project, not at the individual project level in order to fully implement the purpose of the law to protect the historic sites as well as to save time and expense for the developer.
- 2) For projects that propose the use of state or county lands, HRS Chapter 343 is triggered. In enacting Chapter 343, the Hawaii Environmental Policy Act (HEPA), the legislature stated its purpose:

The legislature finds that the quality of humanity's environment is critical to humanity's well being, that humanity's activities have broad and profound effects upon the interrelations of all components of the environment, and that an environmental review process will integrate the review of environmental concerns with existing planning processes of the State and counties and alert decision makers to significant environmental effects which may result from the implementation of certain actions. The legislature further finds that the process of reviewing environmental effects is desirable because environmental consciousness is enhanced, cooperation and coordination are encouraged, and public participation during the review process benefits all parties involved and society as a whole.

It is the purpose of this chapter to establish a system of environmental review which will ensure that environmental concerns are given appropriate consideration in decision making along with economic and technical considerations.

HRS § 343-1 (emphasis added).

HRS § 343-5(c) provides, in pertinent part, as follows:

Whenever an applicant proposes an action specified by subsection (a) which requires the approval of an agency, and which is not a specific type of action declared exempt under section 343-6, the agency receiving the request for approval shall prepare an environmental assessment of such proposed action at the earliest practicable time to determine whether an environmental impact statement shall be prepared.

(Emphasis added.) As the Supreme Court has articulated:

Mr. Kevin Butterbaugh  
August 22, 2008

Page 3

First, it must be determined whether a project or program is subject to the environmental review process in the first place. Projects are subject to the law if they (1) are either initiated by a government agency ("agency actions") or by a private party who requires government approvals for the project to proceed ("applicant actions"), and (2) propose one or more of nine enumerated land uses or administrative acts, known as "triggers." See HRS § 343-5(a)(1)-(9); Guidebook, supra, at 9. If a triggering event occurs, an EA must be prepared, unless the program or project is declared exempt.

*Sierra Club v. DOT*, 115 Hawai'i 299, 306 167 P.3d 292, 299 (2007) ("Superferry")

HRS § 343-2 defines an "action" as "any program or project to be initiated by any agency or applicant." An action is not the same thing as a "use." An action (or project) may involve the use of state or county lands. But a project is often much bigger than the use of state lands itself. In *Kahana Sunset*, the project was a 312-unit multi-family residential development that used state land beneath a road for a 36-inch drainage line. In *Citizens for the Protection of the North Kohala Coastline v. County of Hawai'i*, 91 Hawai'i 94, 979 P.2d 1120 (1999), the project was a hotel, residential subdivision and golf course that used state land underneath a highway for two underpasses. In *Sierra Club v. Office of Planning*, 109 Hawai'i 411, 126 P.3d 1098 (2006), the project was the development of thousands of houses and related services that relied on the eventual use of state land under highways for a 36-inch sewage transmission line.

In each of these cases, the applicant was not seeking a permit to use public land. Instead, the use of county or state lands was a very small component of the proposed action for the purposes of Chapter 343 analysis. The Hawaii Supreme Court held in each case that the use of state or county lands for new infrastructural improvements required to facilitate a large scale development triggered the requirement for an environmental assessment – even though the agency rendering the land use decision did not make a decision approving the specific use of state or county lands.

HRS § 343-5 "unequivocally requires preparation of an EA for any "action" that proposes the use of state land." *Ohana Pale Ke Ao*. An EA and/or EIS must include a cultural assessment which should analyze the impact of the development on historic and cultural resources, including archaeological features.

An assessment of the cultural and archaeological features in the area is not only required under the EIS process but is also prudent both for the HCDA and GGP to evaluate prior to finalizing development plans and before construction begins as the mitigation processes can be developed ahead of time. Therefore, the HCDA should require completion of an assessment and/or impact statement prior to deeming a developer's application complete where that developer proposes the use of any state land, however minimal. In addition, should any historic burials be discovered in the archaeological testing process, the HCDA should also require that the Oahu Island Burial Council's process to determine mitigation and treatment of those burials take place prior to deeming a developer's application complete for purposes of triggering the two-hundred day approval period.

Mr. Kevin Butterbaugh  
August 22, 2008

Page 4

**Conclusion**

The HCDA is required to play a far more proactive role in the protection of the State's public trust resources and should do so by requiring early assessment of the historic resources of the Kaka'ako Mauka area, an area containing a number of known historic sites and archaeological features, and one in which additional features are being discovered even during the redevelopment process. Careful assessment, testing, and planning will reduce delays as well as unnecessary and unlawful disturbance of historic properties.

Mahalo for the opportunity to comment on your SEIS. You can reach me at (808) 521-2302 should you have any questions.

Sincerely,



Camille K. Kalama  
Staff Attorney  
Native Hawaiian Legal Corporation

Hawaii Community Development Authority  
 Attn: Ms. Susan Tamura  
 677 Ala Moana Blvd., Suite 1001  
 Honolulu, HI 96813

July 28, 2008

RE: Revised Mauka Plan EIS, Industrial properties and Reserved Housing Requirements

Dear Ms. Tamura,

Upon reviewing the draft EIS, I'd like to alert the Authority to the detriment of its policy to allow developers to use offsite lots for their reserved housing requirement. I understand the desire to build these housing units. However, it comes at a cost to the small lot owner. This EIS is charged to preserve the small lot.

Sample of sequence of events:

1. Developer over pays for industrial or multiple of small properties to comply with the reserved housing requirement.
2. The inflated price is passed on to the market condos and does not truly represent the value of an industrial or small lot property.
3. City and County looks at comparable sales and raise property taxes.
  - a. Small lots which desire to stay are too small to generate enough income to sustain the increased cost.

Although the authority has no control over city real property tax policy, it is directly responsible through its policies on its effect.

The Hawaii Alliance for Community-Based Economic Development (*HACBED*) did a recent study. Small business in Kakaako Mauka contributed \$2.02 billion in 2006. This represents 5.9% of Honolulu and 3.9% of the states economies, respectively. The offsite housing policy promotes displacement and closure of these businesses. I would encourage the authority to discourage offsite reserved housing. It should encourage development on site.

Thank you. Should there be anything I can help with, please contact me via email [g\\_onishi@msn.com](mailto:g_onishi@msn.com) or phone 927-2704.

Sincerely,  
 Gary Onishi



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Gary Onishi  
 927 Aliamanu Street  
 Honolulu, Hawaii 96818

Dear Mr. Onishi:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
 Kakaako, Oahu, Hawaii

Thank you for your comments on the Draft SEIS sent via e-mail on July 28, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We acknowledge your comments on the alleged detriments of allowing developers to use off-site lots to fulfill reserved housing requirement and the contribution of small businesses in the Kakaako's Mauka Area to the City and State's economies.

The Draft Mauka Area Plan proposes that reserved housing developed within the Mauka Area be primarily integrated within the development project. However, it is important to note, that Chapter 206E-4(18), Hawaii Revised Statutes currently allows reserved housing units to be constructed outside of the project site but within the geographic boundary of the Mauka Area. Accordingly, the proposed Final SEIS will indicate that the Mauka Area Plan Reserved Housing Program has, amongst other elements, a "preference" for reserved housing that is inclusionary.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
 Anthony J. H. Ching  
 Executive Director

AJHC/DN/ST:ak  
 c: EDAW, Inc.

Hawaii Community Development Authority  
 Attn: Ms. Susan Tamura  
 677 Ala Moana Blvd., Suite 1001  
 Honolulu, HI 96813

August 11, 2008

RE: Revised Mauka Plan SEIS

Dear Ms. Tamura,

The SEIS mentions a few things how it plans to support small business. However, it offers no or little detail on it plans to support the small businesses. The following are examples.

**Improvement Districts and HCDA planned development changes:**

1. The EIS or the Authority does not explain how assessments will be calculated.
2. The EIS does not consider if a business can afford the assessments.
3. The EIS has no provisions for losses during and due to construction.
4. The EIS or the authority has no provisions on how they would support businesses that are adversely affected by an ID.
  - a. For example loss of parking due to condemnation.
  - b. Loss of loading and unloading due to ingress or egress changes from the ID.
5. The EIS acknowledges the Authorities actions will most likely increase real property and other taxes for area businesses and residents. However, it offers no provisions to mitigate the issues but acknowledges government will be a benefactor by the increased tax base.

**Assistance Programs:**

The EIS speaks of assisting small businesses and residents. It does not explain in detail how.

1. Will staff be provided?
  - a. What will staff do or not do?
2. How will a budget be established?

**Kakaako Industrial Component:**

HACBED has conducted a recent survey of small properties in Kakaako. The owners and lessees surveyed want to stay in Kakaako because of its unique location. The location provides efficient service to its customers. It also helps with employee retention because a majority of employees come from near by. The study revealed Kakaako businesses provide over \$2 billion to Hawaii's economy. This EIS has not considered the impact of the loss of these businesses to the State. For example, if hotels in Waikiki have to go to Kalihi, Waipahu or further for its supplies or services, what is the economic cost?

Thank you. Should there be anything I can help with, please contact me via email [g\\_onishi@msn.com](mailto:g_onishi@msn.com) or phone 927-2704.

Sincerely,  
 Gary Onishi



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Gary Onishi  
 927 Aliamanu Street  
 Honolulu, Hawaii 96818

Dear Mr. Onishi:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your comments on the Draft SEIS sent via e-mail on August 11, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

**Improvement Districts and HCDA planned development changes:**

1. The Hawaii Community Development Authority's ("HCDA") Improvement District ("ID") program was assessed in the Final SEIS, Kakaako Community Development District Plan, May 1985 ("1985 Final SEIS"). The 1985 Final SEIS states that pursuant to Chapter 206E-6, Hawaii Revised Statutes ("HRS"), the HCDA shall develop a district-wide improvement program to identify necessary district-wide public facilities. Whenever the Authority decides to construct or improve public facilities, certain costs involved shall be assessed against the real properties that derive special benefits from the public facilities. Calculation of the special benefits may be made by various methods including: 1) the frontage basis; 2) the area of the land; 3) a real property tax assessment on the value of the land and improvement thereon; 4) the floor area ratio permissible for the real property; or 5) any combination of the above methods. Actual method of assessment is determined on a project-by-project basis pursuant to Chapter 91, Hawaii Revised Statutes, Rule Making Procedures, as required by Chapter 206E-6(e), HRS.
2. Your comment that Improvement District projects do not consider if a business can afford the assessment is noted.
- 3/4. Your comment that ID projects have no provisions for losses during construction is noted. The 1985 Final SEIS disclosed that the implementation of future increment construction would result in a number

Mr. Gary Onishi  
Page Two  
May 6, 2009

of adverse impacts affecting the government, business and residential sectors of the Kakaako District. Chapter IV.C.5, Unavoidable Adverse Impacts, of the 1985 Final SEIS states that unavoidable impacts associated with IDs generally pertain to construction related activities. These include decreased air and water quality, increased traffic disruption and congestion, increased noise levels, and disruption of utility services.

Mitigative measures for the Mauka Area include the following:

- Restricting excavation and other construction activities by working on small sections at a time.
  - Where right-of-way acquisition is unavoidable, property owners and lessees will be compensated according to applicable regulations.
  - Provisions will be made to install traffic bridges or steel plates so that all streets, lanes, driveways, garages, etc., will be accessible to traffic for the majority of the times.
  - Pedestrian walkways shall be maintained in passable condition or else other facilities will be provided.
  - All necessary signs, lights, flares, barricades and other protective facilities will be installed, provided and maintained and all necessary precautions for the protection, convenience and safety of the public will be taken.
  - Notices to the public pertaining to the restriction of vehicular traffic and any road closures in the affected work areas will be published prior to the disruption of traffic in a Honolulu daily newspaper of general circulation.
  - It is currently intended that precast box drains will be utilized for the various drain lines to keep the duration of the actual construction period to a minimum.
  - Excavation, shoring and bracing that are carefully designed, planned and carried out would minimize settlement during excavation.
5. The increase in property tax is listed in Section 5.4.2 of the Final SEIS as an unresolved issue. HCDA does not have jurisdiction over the assessment or collection of property taxes.

Mr. Gary Onishi  
Page Three  
May 6, 2009

**Assistance Programs:**

Pursuant to Chapter 206E-10.5, relocation refers primarily to displacement resulting from government-initiated projects. Households and businesses displaced by private section actions shall receive certain public assistance service short of monetary payments. It is the intent of the Authority to provide meaningful relocation assistance for all persons and businesses displaced due to public action. The Draft Mauka Area Plan states that HCDA shall perform the following functions pertaining to relocation assistance.

- Assistance to State and County displacing agencies in the development and implementation of relocation assistance programs for specific public improvement projects.
- Advisory services to displacees of government actions, such as information on Federal and State programs, loans, and other benefits; handling appeals; personal contact with each displaced person; and assistance in finding replacement sites and in actual relocation.
- Coordination of relocation activities with other project activities and other planned or proposed City and State agency actions within the community or nearby areas.
- Advisory services to displacees of private sector actions, or to persons or business concerns occupying property adjacent to any property acquired for public improvement and are caused substantial economic injury because of the public improvement.

**Kakaako Industrial Component:**

With regard to industrial use in Kakaako, the Draft Mauka Area Plan proposes to support the small-lot, mixed-use pattern of Central Kakaako. The strategy for Central Kakaako is to support the viability of small business use while allowing for potential future re-use of small properties in this neighborhood. In response to concerns regarding the viability of small

Mr. Gary Onishi  
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May 6, 2009

businesses and landownership in Central Kakaako, HCDA is currently working with area businesses and landowners to develop a preferred vision that will help guide the future of Central Kakaako. Included in the development of the preferred vision, landowners and business owners developed a list of issues and constraints facing Central Kakaako. The information will be included in Chapter 3.11 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



OliverMcMillan

12533-42

733 8th Avenue

San Diego, California August 20, 2008

92101

T 619.321.1111

F 619.321.1234

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, HI 96813

Re: Draft Supplemental Environmental Impact Statement ("DSEIS")

Dear Susan,

Our family has resided in Oahu since the 1970's, and I appreciate the opportunity to submit my comments on the DSEIS. To start, I appreciate all of the good work done by the Hawaii Community Development Authority ("HCDA"), and I support all of the new development and economic growth in Kaka'ako.

In these tough economic times, it is my view that drastic rule changes will result in slowing or stopping new development, and have a negative effect on the local economy. Here are my comments on some of the items noted in the DSEIS:

- The Building Tower Element Maximum Height limit should remain at 400 feet along Ala Moana Boulevard – no benefit to change
- Building Tower Element Maximum Footprint sizes should remain at a maximum of 16,000 square feet – no benefit to change
- The Street-front Element Minimum Height should remain flexible and subject to circumstances of the project – no benefit to change
- Auahi Street should be opened between Koula Street and Kamani Street – need to improve circulation

Additional rules and development restrictions are not good for Kaka'ako or the community, and I appreciate the opportunity to raise my concerns.

Best Regards,

  
Jim McMillan  
4551 Kahaia Avenue  
Honolulu, HI 96816  
(808) 734-8353

HAWAII COMMUNITY  
DEVELOPMENT AUTHORITYLinda Liugle  
GovernorJonathan W. Y. Lai  
ChairpersonAnthony J. H. Ching  
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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Jim McMillan  
OliverMcMillan  
4551 Kahaia Avenue  
Honolulu, Hawaii 96816

Dear Mr. McMillan:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 20, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including the following.

• **Building Height**

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.



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OliverMcMillan

Page 2  
Ms. Susan Tamura  
August 14, 2008

The challenges for new development and redevelopment are become increasingly more difficult. The tightening financial market, rising construction costs, softening housing market, retracting retail expansion, and weakening economy are all challenges that will difficult to overcome in the foreseeable future.

In conclusion, the addition of building restrictions and more stringent development requirements will have an adverse economic effect and a negative impact on the development and redevelopment of Kaka'ako.

Thanks again for your consideration of my comments on the proposed rule changes.

Sincerely,

Dan Nishikawa  
Development Director  
OliverMcMillan

Mr. Jim McMillan  
Page Two  
May 6, 2009

- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in the Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

- **Building Tower Footprint Size**

The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in Appendix B, UDA.

- **Street Front Element**

We acknowledge your recommendation that the Street-front Element minimum height should not be fixed at the greater of 40 feet or four stories. The height of street-front elements continues to remain at the range of 40 feet to 65 feet to maintain pedestrian-scaled developments. Assessments on structure heights for all three alternatives can be found in Section 3.10.2 of the Final SEIS and in Appendix B, UDA.

- **Auahi Street**

We acknowledge your request to open Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with

Mr. Jim McMillan  
Page Three  
May 6, 2009

Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha School properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

Your comment that additional rules and development restrictions are not good for Kakaako or the community is noted. We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



PACIFIC OFFICE PROPERTIES

August 22, 2008

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority  
677 Ala Moan Blvd. Suite 1001  
Honolulu, HI 96813

Re: Comments on Draft Supplemental Environmental Impact Statement (DSEIS)

Dear Ms. Tamura,

Thank you for the opportunity to submit comments on the DSEIS. We are the owners of the leasehold interest in Waterfront Plaza/Restaurant Row. As you know, our property would not be directly impacted by the proposed rule changes. However, we along with our tenants, have a vested interest in the re-development of Kakaako. Accordingly, we have specific concerns about the following recommendations:

1. Limiting the maximum building height to 200 feet.
2. Limiting the maximum building footprint size to 9,000 square feet.
3. Limiting Street-front Elements to a minimum height which is the greater of 40 feet or four stories.
4. Not extending Auahi Street between Koula Street and Kamani Streets.

We believe that these proposed rule changes will make many potential developments financially unfeasible. If that is the case, we fear that nothing will happen and we will continue to have under-utilized land and crumbling improvements in Kakaako. We strongly encourage HCDA to perform an economic impact analysis to determine whether or not projects are economically feasible under the proposed rules. We are also concerned that the height restrictions on street-front elements will have the effect of tying the architect's hands so that they will not be able to design different projects of varied designs that will be more aesthetically pleasing. It is our observation that some of the most attractive designs incorporate courtyards and the like which would not satisfy the proposed minimum 40 foot requirement. Finally, we believe that extending Auahi Street between Koula and Kamani Streets would significantly improve the traffic flow in the area. We encourage you to re-examine whether limiting this extension to pedestrian traffic is in everyone's best interest.

Once again, thank you for the opportunity to comment on the proposed plan.

Sincerely,

Jay H. Shidler  
Chairman of the Board of Directors  
Pacific Office Properties

Lawrence J. Taff  
Executive Vice President - Operations  
Pacific Office Properties

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AUG 22 2008

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Jay H. Shidler  
Chairman of the Board of Directors  
Pacific Office Properties  
841 Bishop Street, Suite 1700  
Honolulu, Hawaii 96813

Mr. Lawrence Taff  
Executive Vice President - Operations  
Pacific Office Properties  
841 Bishop Street, Suite 1700  
Honolulu, Hawaii 96813

Dear Messrs. Shidler and Taff:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following responses in the respective order of your comments.

1. In response to the comments received for the Draft SEIS, a third alternative analysis to the existing and Draft Mauka Area Plan was developed. In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:
  - Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront

Mr. Jay H. Shidler  
Mr. Lawrence Taff  
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May 6, 2009

experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.

- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis (“UDA”).

2. The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development.
3. We acknowledge your recommendation that the Street-front Element minimum height should not be fixed at the greater of 40 feet or four stories. The height of street-front elements continues to remain at the range of 40 feet to 65 feet to maintain pedestrian-scaled developments. Assessments on structure heights for all three alternatives can be found in Section 3.10.2 of the Final SEIS and in Appendix B, UDA.
4. We acknowledge your request to open Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-

Mr. Jay H. Shidler  
Mr. Lawrence Taff  
Page Three  
May 6, 2009

Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha School properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

We acknowledge your request for an economic impact analysis to ascertain if redevelopment feasibility and residual land values under the proposed redevelopment guidelines are sufficiently attractive to incentivize developers. An economic impact analysis for all parcels within the entire Mauka Area is unattainable as each development project has its respective project parameters. Financial parameters such as cost of equity, cost of debt, internal rate of return, and hurdle rate that are typically used in developing economic models for any real estate development can vary from one landowner to the next. It is not possible to develop an economic impact analysis that addresses the financial parameters of every landowner. At best, any economic impact analysis developed by the Hawaii Community Development Authority will have to be hypothetical in nature by necessity. We believe that the physical development parameters such as floor area ratio, tower footprint, and height, provide more meaningful information to the landowners regarding development potential of their land parcels than a hypothetical economic model.

Mr. Jay H. Shidler  
Mr. Lawrence Taff  
Page Four  
May 6, 2009

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. U. Chung  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

**Sohn, Kristen**

**From:** Susan J Tamura [Susan@hcdaweb.org]  
**Sent:** Tuesday, August 19, 2008 9:38 AM  
**To:** Sohn, Kristen; Butterbaugh, Kevin  
**Cc:** lilinoe@hcdaweb.org; deepak@hcdaweb.org  
**Subject:** Fw: Comments on the Draft SEIS Mauka Plan

"David Keith" <keith@phase3properties.com>

To: <Susan@hcdaweb.org>

cc

08/19/2008 09:29 AM

Subject: Comments on the Draft SEIS Mauka Plan

Susan, By way of introduction Phase 3 Properties is the developer for Asia Pacific Research Center (APRC) for Kamehameha Schools. I am writing you with our concerns regarding the draft Supplemental Environmental Impact Statement (SEIS) for property mauka of Ala Moana Boulevard. We have read the SEIS and feel that some specific elements of the plan will limit future development opportunities within the district. While these rules are generally favorable towards development of an urban village in Kaka'ako, there are three points that we feel limit the development potential for the district:

1. The recommendation that building heights be reduced from 400 feet to 200 feet for structures fronting Ala Moana Boulevard.
2. The recommendation that building floor plates for structures over 200 feet be reduced from 16,000 square feet to 9,000 square feet.
3. The absence of Auahi Street connectivity from the General Growth planning area to the Kamehameha Schools' lands.

For the Ala Moana Building Heights:

- A decision to reduce the overall height of the buildings on Ala Moana will substantially reduce the projects return and the private sector's ability to fund public benefits.
- Concerns related to view planes can be addressed by the orientation of buildings rather than a reduction in height.
- The view environment must be considered within an urban context rather than a suburban framework.
- Higher towers contribute to more diversity of people in the district, a stated HCDA planning objective.
- Higher towers, if done well, add beauty to the image of the city. Ensuring towers are well designed can be achieved through the design review process rather than a reduction in height.
- If HCDA wants to provide workforce housing, higher towers provide the best potential to achieve this objective because they generate required profits that offset reserved housing subsidies.
- The reduction in height limits materially impacts construction cost economies of scale (height-wise)

For the reduction in the Floor Plate Sizes:

- The view plane concerns related to larger floor plates can be addressed by orientations rather than slimmer building configurations. This matter is better handled in the design review process than through

8/19/2008



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KALAELOA

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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. David Keith, AIA  
Phase 3 Properties, Inc.  
8910 University Center Lane, Suite 265  
San Diego, California 92122

Dear Mr. Keith:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your e-mail message received on August 19, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address issues relating to urban form and design.

1. In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kaka'ako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:
  - Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.
  - Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.

Page 2 of 2

the creation of development rules that hinder economic feasibility.

- Reducing floor plates from 16,000 square feet to 9,000 square feet combined with a 200 foot reduction in floor height (approximately 20 floors) will equate to fewer units per building. The reduced number of units will inevitably mean that only the most affluent can afford to purchase within Kaka'ako towers.

For the Auahi Street Connectivity:

- The draft SEIS points out that traffic impacts from the build-out of the mauka lands is an area-wide concern. One solution to this problem is to enhance connectivity and alternative routes through the District. Despite the acknowledged problem a major east-west corridor, Auahi Street, remains closed at Kamani Street.
- Having more streets eases the traffic burden on all streets.
- Keeping Auahi Street closed reduces the economic potential of the area, thus reducing the economic contributions possible to the State and City.
- Auahi Street is a major public gesture in the GGP Master plan that should be extended throughout the district to maintain continuity and enhance pedestrian and vehicular connectivity.

In summary, these concerns represent our analysis of the draft SEIS proposed changes and we feel all three main points need to be addressed before the SEIS is finalized.

Sincerely,

David Keith, AIA  
Phase 3 Properties, Inc.  
8910 University Center Lane  
Suite 265  
San Diego, CA 92122  
(858) 546-0855 ext 25  
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(858) 216-6712 - Cell



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8/19/2008

Mr. David Keith, AIA  
Page Two  
May 6, 2009

- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

2. The third alternative analysis assesses floor plates of tower elements depend on the lot size. As such, floor plates may range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. Assessments on building envelopes for all three alternatives can also be found in Section 3.10.2 of the Final SEIS and in the UDA, Appendix B.
3. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Kling  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

RCLCO

August 21, 2008

Ms. Susan Tamura, Planner  
Hawaii Community Development Authority (HCDA)  
c/o Comments on the Draft SEIS Mauka Plan  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, HI 96813

SUBJECT: Comments on the Draft SEIS Mauka Plan

Dear Ms. Tamura,

I am a Managing Director at RCLCO, the leading knowledge solutions provider to the real estate industry for over 40 years. My firm is currently assisting Kamehameha Schools with development advisory services for their landholdings in Kaka'ako. We have reviewed the Draft Supplemental Environmental Impact Statement for the Kaka'ako Mauka Area Plan and have noted several concerns that we would like to bring to HCDA's attention, which are as follows:

- Recommendation to reduce building heights along Ala Moana Boulevard from 400 feet to 200 feet
  - View corridor preservation may be achieved through careful orientation of buildings as opposed to limiting building heights.
  - Building height reduction will limit the amount of revenue that may be generated from buildings, which in turn may impact their ability to support Reserved Housing requirements in a financially feasible manner. The net result may be less production of Reserved Housing and no new development along Ala Moana Boulevard.
  - Reduced height limits impact construction cost economies of scale, which when taken into account with lower revenue generation potential may also serve as a disincentive to new development along Ala Moana Boulevard.
  - Taller buildings along Ala Moana Boulevard would serve as landmarks for the district and increase the district's stature within the urban fabric of Honolulu.
- Recommendation to limit building floorplate maximum to 9,000 square feet for portions of buildings between 215 and 400 feet in height
  - High-rise residential towers generally have floorplates larger than 10,000 square feet. Limiting floorplates to 9,000 square feet would dramatically impact the financial feasibility of residential projects in Kaka'ako and may effectively discourage new development and the creation of Reserved Housing in the process.
  - Smaller floorplates would limit the number of units per floor. Fewer units per floor are a general characteristic of higher-end residential projects, which may skew residential towers taller than 215 feet into a more affluent positioning and reduce the diversity of the district.
  - Towers that narrow from 16,000 square foot to 9,000 square foot floorplates would lose efficiency, resulting in reduced financial feasibility which may discourage new development.

DEVELOPMENT SERVICES GROUP  
AN AFFILIATE OF ROBERT CHARLES LESSER & CO.

RECEIVED  
AUG 22 2008



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DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

May 6, 2009

Mr. David Malmuth  
Managing Director  
Robert Charles Lesser & Co., LLC  
7200 Wisconsin Avenue, 7th Floor  
Bethesda, Maryland 20814

Dear Mr. Malmuth:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including the following.

• **Building Height**

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront

- o 9,000 square foot floorplates are too small for office users, which would limit the development of office space in Kaka'ako and diminish the district's ability to support a strong jobs/housing balance.
- Recommendation that street front elements have a minimum height of 40 feet
  - o Assuming new development district-wide, the built environment experienced by pedestrians and drivers would be too uniform and lacking in architectural variety.
  - o 40 foot buildings at street front would create a canyon-like environment along narrower streets, which would decrease the overall pedestrian-friendliness of the area.
- Missing street grid connectivity within district, namely for Auahi Street
  - o Given that traffic congestion is a major concern in the district, one way to address this is to increase connectivity throughout the district to the extent possible. Opening Auahi Street would help to achieve this.
  - o Auahi Street is a major focal point in the General Growth Properties Master Plan. Opening it would maintain continuity and promote connectivity throughout the district, while also enhancing its status as a focal point.

We thank you for listening to our concerns and hope that you will address them in the final version of the SEIS. Feel free to contact us if you have any questions about them.

Best Regards,

ROBERT CHARLES LESSER & CO., LLC



David Malmuth  
Managing Director

Mr. David Malmuth  
Page Two  
May 6, 2009

amenities at Kewalo Basin and Ala Moana Beach Park.  
Building forms should step down towards the waterfront.

- Preserve and encourage pedestrian access to the waterfront/Makai Arca. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in the Section 2.14.3 of the Final SEIS and in Appendix B, Urban Design Analysis ("UDA").

- **Building Tower Footprint Size**

The third alternative analysis proposes floor plates that range from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the effort to enhance the future development potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in Appendix B, UDA.

- **Street Front Element**

We acknowledge your recommendation that the Street-front Element minimum height should not be fixed at the greater of 40 feet or four stories. The height of street-front elements continues to remain at the range of 40 feet to 65 feet to maintain pedestrian-scaled developments. Assessments on structure heights for all three alternatives can be found in Section 3.10.2 of the Final SEIS and in Appendix B, UDA.

Mr. David Malmuth  
Page Three  
May 6, 2009

- **Auahi Street**

We acknowledge your request to open Auahi Street between Koula and Kamani Streets. The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha School properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

RECEIVED  
AUG 22 2008

August 21, 2008

EDAW Inc.  
841 Bishop Street 1910  
Honolulu, HI 96813  
ATTENTION: Mr. Kevin Butterbaugh

Hawaii Community Development Authority  
677 Ala Moana Blvd. Suite 1001  
Honolulu, HI 96813  
ATTENTION: Ms. Susan Tamura

Re: Draft Supplemental Environmental Impact Statement Revision to the Kaka'ako Mauka Area Plan and Rules

Dear Sir and Mesdame,

The following comments are regarding the Draft Supplemental Environmental Impact Statement (DSEIS) for the Kaka'ako Mauka Area Plan and Rules (KMAPR)

While the majority of future redevelopment in Kaka'ako is likely to occur in the more makai areas of the district, residents and businesses in relatively stable, established neighborhoods such as Sheridan are very much affected by redevelopment in the form of both short term impacts during the construction phase and significant long-term influences on the neighborhood. A stark example of the latter is the recent construction of the Moana Pacific superblock project on the edge of Sheridan, which literally casts a shadow on the rest of the neighborhood with its huge twin towers and serves a population that is much more affluent than its Sheridan neighbors.

Sheridan, Rycroft, Makaloa, Elm, Birch, Alder, and Kamaile are narrow local streets in the Sheridan neighborhood, that provide access to the major traffic corridors of Kapiolani Blvd., Pi'ikoi St., King St. and Pensacola St. . These smaller local streets are vital not just for vehicles, but also for safe pedestrian and bicycle travel in an urban neighborhood that offers convenient proximity to jobs, shopping, schools, bus transit and other services. Presently, Pensacola and Pi'ikoi Streets are barriers to safe and convenient pedestrian travel from Sheridan to adjoining areas because of the lack of signalized crosswalks, combined high traffic speed and volume and the width of the thoroughfare. For this reason, we were happy to see the proposal to restore these streets to two-way travel with a landscaped median, but are now concerned that this proposal may not be implemented because of the traffic engineer's analysis. We have to ask, is it more important to keep vehicular traffic moving toward the freeway than to serve the residents of urban neighborhoods? Sheridan has a high and growing percentage of elderly residents, so this issue has very great importance.

Over the years the Sheridan area has been home to multiple churches and organizations that, like Makiki Christian Church, not only play a vital role in the community, but serve as reminders of the Sheridan area's rich cultural history. We believe that like Makiki Christian Church there are other sites in the Sheridan area that should be taken into consideration when discussing historical and cultural significance.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Ingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

Ms. Doris Nakamura  
Sheridan Terrace, Inc.  
650 Sheridan Street  
Honolulu, Hawaii 96814

Dear Ms. Nakamura:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

As stated in the Draft SEIS, we believe that the Sheridan Neighborhood will most likely to maintain its small fee simple lot sizes and land use within the 25 – 30 year planning horizon. We acknowledge that it is vital to have safe pedestrian and bicycle facilities in an urban neighborhood such as Kakaako. Through the planning process, we have determined that Pensacola and Piikoi Streets are barriers to safe and convenient pedestrian travel from Sheridan to the adjoining areas. As noted in your letter, the transportation analysis performed for the Draft SEIS showed that the Hawaii Community Development Authority's proposal to turn Piikoi and Pensacola Streets into two-way medians creates unacceptable level-of-service traffic flow. Ultimately, the decision on the final transportation plan for the Mauka Area will be determined through consultation with the City and County of Honolulu as well as the Kakaako community through the Mauka Area Plan amendment process. Traffic signal at a mid-block location along Piikoi and Pensacola Streets will be noted in Section 3.7 of the Final SEIS as a possible measure to ensure pedestrian safety.

Efforts will be made to include historic and culturally significant structures in the Final SEIS. Please note that Tenrikyo Temple and Shingon Mission Buddhist Temple, identified in your

- Tenrikyo Temple on Kamaile St.
- Shingon Mission Buddhist Temple on Sheridan.

Our concern is that without taking into account cultural indicators nor encouraging community residents who are able to share their insights as to the history and cultural evolution of the Sheridan area, HCDA's plan and analytical decision making simply cannot fathom the scope or impact these sites have had on the entire Kaka'ako Area.

The National Registry of Historical Places' and the Hawaii Registry of Historical Places' criteria, cannot be the sole factor in what is deemed historical or cultural, especially when generations of residents who live in the affected are left out of that discussion.

It is of the utmost importance to both landowners and residents of the Sheridan area that the richest aspects of our way of life are preserved and we humbly ask that the DSEIS be revised to accommodate these issues.

Sincerely,

*Doris Nakamura* - Sheridan Terrace, Inc.  
Doris Nakamura co-owner

Additional signers:

*Beatrice Nakamura*  
Mie's Hairstyles -  
co owner

*W.P. Lamb*  
Sheridan Bldg. Supply Co.

*M. Tanaka*  
Sheridan Bldg. Supply Co.  
owner

*J. Yamaoka*  
Mie's Hairstyles  
co-owner

*Lothel E. Nekoro*  
Sheridan Terrace, Inc. co owner

*Harold M. Murabami*  
Sheridan Terrace Inc. - co-owner

*[Signature]*  
650 Sheridan - Apt. #10  
St.

*[Signature]*  
650 Sheridan St. - Apt. #103

Ms. Doris Nakamura  
Page Two  
May 6, 2009

letter, are situated outside of the Kakaako Community Development District Mauka Area.

We appreciate your interest and participation in the environmental review process.

Sincerely,

*Anthony J. W. Ching*  
Anthony J. W. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

12510-22



Susan J  
Tamura/HCD/DBEDT  
08/21/2008 08:31 AM

To lillinoe@hcdaweb.org  
cc deepak@hcdaweb.org  
bcc  
Subject Fw: Kaka'ako Mauka Area Master Plan

Please process as a comment letter.

----- Forwarded by Susan J Tamura/HCD/DBEDT on 08/21/2008 08:28 AM -----  
&HCD/DBEDT

Sent by: Cal T Machida/HCD/DBEDT

To susan@hcdaweb.org

cc craig@hcdaweb.org

Subject Fw: Kaka'ako Mauka Area Master Plan

08/20/2008 02:35 PM

Susan: Forwarding to you the following email comment on the SEIS for Mauka Plan.

Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
Telephone: (808) 587-2870  
Facsimile: (808) 587-8150

----- Forwarded by Cal T Machida/HCD/DBEDT on 08/20/2008 02:32 PM -----

sha@tsdye2.com

To contact@hcdaweb.org

cc

Subject Kaka'ako Mauka Area Master Plan

08/20/2008 02:22 PM

You are receiving this mail because Thomas S. Dye  
sha@tsdye2.com  
is sending feedback about the site administered by you at <http://hcdaweb.org>.  
The message sent was:

Aloha, My name is Dr. Thomas S. Dye. I am President of the Society for Hawaiian Archaeology, a professional organization with more than 200 members. I am writing with our society's review of the Cultural Resources sections of the Kaka'ako Mauka Area Master Plan. We see two problems with the Plan. 1) HCD/DBEDT, as the government agency responsible for promoting and coordinating development in Kaka'ako, must ensure that public and private development plans within its area of jurisdiction are reviewed by the professional staff of the



HAWAII COMMUNITY  
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KALAELOA

Linda Lingle  
Governor

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Chairperson

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Web site  
[www.hcdaweb.org](http://www.hcdaweb.org)

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Thomas Dye  
Society for Hawaiian Archaeology  
P. O. Box 23292  
Honolulu, Hawaii 96823

Dear Mr. Dye:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kaka'ako, Oahu, Hawaii

Thank you for your e-mail message received on August 20, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We offer the following in response to your comments.

1. We acknowledge your concerns regarding Section 3.5.2, Potential Impacts and Mitigation Measures of the Draft SEIS. With regard to the potential for identifying the presence of subsurface archaeological and cultural sites, we have recently implemented a requirement that all developers and applicants consult with the State Historic Preservation Division ("SHPD") prior to submission of any plans for project eligibility. A letter of concurrence from the SHPD shall be required prior to acceptance of an application for project eligibility review. This policy has already been implemented for projects within the Mauka Area. In addition, we propose to formalize the SHPD review process in the Mauka Area Rules amendment process pursuant to Chapter 91, Hawaii Revised Statutes.
2. Project consultant Cultural Surveys Hawaii, is of the opinion that a percentage of coverage area and defining site boundaries should be set in order to characterize all of the important variables captured in the Mauka Area. As a result of this broad coverage the archaeologists are able to define the variations in findings, stratigraphic context and to infer past or likely past land use of various portions of the project area. On this basis

State Historic Preservation Division (SHPD). In our view, it is not enough for HCDA to "encourage" developers to consult with SHPD, as it proposes to do on page 3-14. In the past, HCDA's evasion of its responsibility has contributed to the failure of historic preservation efforts in Kaka'ako, exemplified most recently by the Ward Villages development which has left the Hawaiian community bitter over the treatment of native Hawaiian iwi kupuna and the developer without a place to construct a planned office tower. This pilikia could have been avoided if HCDA had initiated historic preservation review early in the development process, and then ensured that the applicant followed through with any recommendations made by SHPD. HCDA should accept this responsibility and amend the plan to reflect this fact. 2) The Cultural Impact Assessment subtly mis-characterizes the nature of archaeological inventory survey when it sets out a typical percentage of a project's footprint investigated during the survey. The percentage of the area investigated is not a criterion used to determine whether an inventory survey has been acceptably carried out. More important is that all sites have been identified and their boundaries determined. At the Ward Villages development, archaeologists used the percentage of the area investigated to argue that inventory survey had been completed. This error was revealed in dramatic fashion when the bones of more than 50 individuals were later found on the property. If the archaeologists had determined the boundaries of the burial ground at Ward Villages early in the development process, there is a good chance that the pilikia noted above could have been avoided. The cultural impact assessment should be amended to highlight the importance of determining the boundaries of historic properties including burial grounds in the Kaka'ako Mauka Area. Thank you for the opportunity to comment on the Kaka'ako Mauka Area Plan. If you have any questions, please feel free to contact me at sha@tsdye2.com. All the best, Thomas S. Dye President, Society for Hawaiian Archaeology

--

Portal Administrator

Mr. Thomas Dye  
Page Two  
May 6, 2009

the boundaries of the historic properties are defined, characterized and delineated on the ground.

The cultural impact assessment ("CIA") for the Mauka Area will be included in the Final SEIS as Appendix D. As you may be aware, the purpose of the CIA is not to define specific scopes for future archaeological studies, but to address cultural concerns which will be relevant for informing future archaeological studies. The CIA will include a summary of the findings of past archaeological studies within the Mauka Area.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Chng  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.

August 22, 2008

Hawaii Community Development Authority (HCDA)  
c/o Comments on the Draft SEIS Mauka Plan  
677 Ala Moana Blvd. Suite 1001  
Honolulu, Hawaii 96813

Attn: Ms. Susan Tamura, Planner, HCDA

I am pleased to submit the following comments after reviewing the Draft EIS Mauka Area Plan dated July 2008.

**Development Height Restrictions Along Ala Moana Blvd.**

I recognize that the visual assets of the Ala Moana Blvd. view corridors identified in the study are desirable elements to be preserved. However, the photographic studies included in the study do not sufficiently analyze differences in impacts between the 400 foot structures versus the 100-200 foot structures. The impacts of the 400 foot structures should also be studied in the Mauka-Makai configuration as recommended in the Draft Plan before any decision is to be made on reducing the maximum heights along the boulevard. The current touched-up photos only portray the 400 foot towers in the east-west configuration.

In consideration of development costs, due to requirements in fire protection and construction methods, construction and operational costs make it very infeasible for land owners and developers to produce new buildings between the ranges of 65-150 feet. If these buildings are to include "reserved units" or any type of affordable units, further diminishing feasibility will force these projects to be in the 300-400 foot range or no development will occur.

**Building Floor Plates**

The reduction of floor plates from 16,000 to 9,000 square feet has several construction-cost implications that will make development even more difficult for landowners and developers. The typical helix-type parking structure requires a width of 120 feet to function efficiently for up and down traffic. Being limited to a footprint of 9,000 square feet results in each level running a length of 75 feet maximum - or only 7-8 parking stalls. This is a major impact of footprint reduction which will make it very unattractive for landowners and developers to invest in any type of new building construction.

**40-65 Foot Height Requirements for Street Frontage**

The draft is unclear as to how this requirement works in conjunction with the Mid-Rise and Tower elements. It would be desirable to step the taller elements back from the street - however, with 9,000 square foot limitations on the total building footprint, it is difficult to conceive of any efficient floor plan for the higher elements connected to the 40-65 foot high extrusions.

If the 40-65 foot high hardscape features are required for the entire street front, there will be a serious lack of green elements which can provide a much more desirable and soothing

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Chairperson

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www.hcdaweb.org

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Sherman Wong  
c/o Kiewit Building Group  
55 Merchant Street, Suite 1500  
Honolulu, Hawaii 96813

Dear Mr. Wong:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter received via fax on August 22, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. The third alternative analysis addresses many of your comments and recommendations including thing following

• **Height Restriction along Ala Moana Boulevard**

In the third alternative analysis, parcels along Ala Moana Boulevard are designated as being in a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, it warrants a discretionary design review to ensure that any proposed tower elements are planned to enhance the urban design framework in the Mauka Area. The review process will study various aspects of the proposed development such as building configurations, height, orientation, and location. The guiding principles for the review process can be found in Section 3.1 of the UDA, Appendix B.

experience for the pedestrian. Green elements in front yards can also provide areas for innovative environmental solutions. Front yard areas can be utilized to treat for water quality and store non-potable water underground. Landscaping also assists in reducing the ambient heat or "heat-island" effect for both the pedestrians outside and the building occupants inside.

#### **Auahi Street Thoroughfare**

The areas with the greatest development potential exist within the two areas of Pauahi and Auahi. The East-West traffic links between these two areas are very important to ensure the success and vibrancy of these two lifestyle communities. Therefore, it is highly recommended that Auahi Street be open to traffic between the intersections at Ward Avenue and South Street. Due to the increase in residents and businesses proposed for the area, it is very important to establish stronger east-west connectivity within the communities and avoid the need to drive onto the major boulevards.

Besides the reconnecting of Auahi Street, there is a proposed extension of Pohukaina Street on both sides of Ward Ave. It is recommended there be more analysis of this scenario. The Pohukaina intersection with Ward Avenue will be very close to Auahi Street. If there is to be a more desirable traffic thoroughfare through the Pauahi area, it would be on the existing Auahi Street corridor rather than Pohukaina. Pohukaina Street will service the Mother Waldron Park and the Pohukaina Elementary School if it is to be recommissioned. Therefore Pohukaina Street should be treated in a fashion more similar to a lower-speed residential scale.

#### **Public Facilities – Parking**

The Draft Plan should consider the possibility of creating municipal parking or shared parking structures to promote walkability within the neighborhoods. If every large and small development is to provide its own parking, people will not be encouraged to walk from one local destination to another local destination. Especially for the smaller property owners, setting aside land area for parking or developing structured parking can be very cost-prohibitive. Therefore, if parking can be arranged on the community level and provided with other financing methods such as ID funding or shared infrastructure costs between multiple landowners, the cost burden can be drastically reduced for the individual landowners – therefore accelerating the build out of the community master plan.

Thank you for your consideration of my comments to the Kakaako Mauka Area Draft SEIS.

Aloha and Mahalo.



Sherman Wong, LEED-AP  
Honolulu Resident

Mr. Sherman Wong  
Page Two  
May 6, 2009

- **Building Floor Plates**

We note that parking is expected to be located within the Street Front element and not limited to the 9,000 square foot tower footprint. In addition, the third alternative analysis provides a range of floor plates from 8,000 square feet to 16,000 square feet on lots ranging from less than 40,000 square feet to greater than 160,000 square feet. It reflects the efforts of accommodating potential of the properties while minimizing oversized development. A description of the tower footprint analysis is provided in Section 3.10.2 of the Final SEIS and in the UDA, Appendix B.

- **40-65 Foot Height Requirement for Street Frontage**

Proposed setbacks for the street-front element ranges from 5 feet to 0 feet from the property line, depending on the street type. The mid-height and tower elements are proposed to be set back 50 feet from a build-to line on Promenade Streets and 20 feet from build-to lines on other streets. The street-front element will not be contained to the 9,000 square foot tower footprint. Taller elements are proposed to be stepped back from the property line. A description of the urban design proposal is provided in Section 3.10.2 of the Final SEIS and in the UDA, Appendix B.

Green elements will be provided in the public right-of-way. The Draft Mauka Area Plan proposes tree-lined streets that will connect major parks within and outside of the district. Although green elements in front yards can provide for innovative environmental solutions; for urban environments, expansive front yards run counter to active urban streets.

- **Auahi Street**

The Draft Mauka Area Plan proposes the realignment of Auahi Street to connect with Pohukaina Street west of Ward Avenue to

Mr. Sherman Wong  
Page Three  
May 6, 2009

provide a Ewa-Diamond Head connection within the District. The Pohukaina-Auahi Street alignment was deemed preferable as it affords a better connection to the Civic District. For traffic circulation purposes, Pohukaina-Auahi Street connection better services the District as it is centrally located. Auahi Street terminates at South Street, servicing primarily Kamehameha Schools properties. Assessments on the traffic analysis for this road section can be found in Section 3.7 of the Final SEIS.

- **Public Facilities – Parking**

We acknowledge your support of a parking program developed at the community level with other financing methods including improvement district funding and shared infrastructure costs.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/DN/ST:ak  
c: EDAW, Inc.



August 22, 2008

AUG 22 2008

**MEMORANDUM**

**TO:** Susan Tamura, Planner, HCDA  
[Susan@hcdaweb.org](mailto:Susan@hcdaweb.org)

Hawaii Community Development Authority (HCDA)  
 c/o Comments on the Draft SEIS Mauka Plan  
 677 Ala Moana Boulevard, Suite 1001  
 Honolulu, HI 96813

**FROM:** Charlie Lorenz, Assistant Pastor  
 Word of Life Christian Center

**SUBJECT:** Comments on the Draft SEIS Mauka Plan

It has been brought to our attention that the possibility has been discussed to reduce height limits on new structures in the Kaka'akako District from 400 feet to 200 feet. Even though we at Word of Life Christian Center would most likely never build a 400 foot structure, we believe that in these trying economic times, anyone that has the means to construct such a building in any area of the Kaka'ako District previously zoned for 400 feet, should be allowed to do so.

**SUPPORTING REASONS:**

1. We believe that maintaining the height at 400 feet would bring tremendous growth to our economy, from architects to laborers in the construction field.
2. It would be an improvement to see more structures or complexes being built in this area that are similar to other structures that have recently been built or developed in the same area in Kaka'ako or nearby outskirts.
3. More condominium development in Kaka'ako will hopefully provide more affordable housing in our down town area, therefore, possibly providing some relief to our ever increasing traffic congestion.
4. Also, the possibility of office complexes or mixed complex use consisting of offices along with residential use, would create more business opportunities and more affordable housing, and therefore provide more economic sustainability in the downtown area.

Word of Life Christian Center appreciates the working relationship that we have with HCDA, and we hope that this letter is contributory to HCDA's goal to thoughtfully develop the Kaka'ako District with wisdom and planning that will bless generations to come.

HAWAII COMMUNITY  
DEVELOPMENT AUTHORITYLinda Ingle  
GovernorJonathan W. Y. Lai  
ChairpersonAnthony J. H. Ching  
Executive Director677 Ala Moana Boulevard  
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(808) 587-8150E-Mail  
[contact@hcdaweb.org](mailto:contact@hcdaweb.org)Web site  
[www.hcdaweb.org](http://www.hcdaweb.org)

Ref. No.: PL EIS 6.26

May 6, 2009

Mr. Charlie Lorenz  
 Assistant Pastor  
 Word of Life Christian Center  
 544 Queen Street  
 Honolulu, Hawaii 96813

Dear Mr. Lorenz:

Re: Draft Supplemental Environmental Impact Statement ("SEIS")  
 Revisions to the Mauka Area Plan and Rules  
 Kakaako, Oahu, Hawaii

Thank you for your letter dated August 21, 2008 regarding the subject Draft SEIS on the Draft Mauka Area Plan. We would like to clarify that the Draft Mauka Area Plan proposes a height reduction for properties along Ala Moana Boulevard. The maximum building height of 400 feet would be allowed for tower elements in most parts of the Mauka Area, with the exception of the area adjacent to the Hawaii Capital District, McKinley High School, Sheridan Neighborhood and the Mother Waldron Neighborhood Park.

In response to comments received through the Draft SEIS public comment period, a third alternative analysis was generated to address comments received on urban form and design. In the third alternative analysis, parcels along Ala Moana Boulevard are designated as a Special Design Review Process Zone. Besides serving as a major thoroughfare between downtown Honolulu and Ala Moana/Waikiki, Ala Moana Boulevard is a major scenic drive showcasing Kakaako's unique urban waterfront. For that reason, a discretionary design review is being proposed to ensure that any proposed tower elements are planned to enhance the urban design framework proposed in the Mauka Area Plan. The third alternative analysis proposes the following principles to guide the review process:

- Visual access to the ocean. The Mauka Area has the potential to provide a unique urban waterfront experience. The building orientation, footprint size, and tower location will need to preserve the views of the major waterfront amenities at Kewalo Basin and Ala Moana Beach Park. Building forms should step down towards the waterfront.

Susan Tamura, Planner, HCDA  
August 22, 2008  
Comments on the Draft SEIS Mauka Plan  
Page 2

Thank you for the opportunity to submit our comments on the Draft SEIS Mauka Plan.  
Please feel free to contact me on my cell at 781-2018 if you have any questions regarding our point of view, or email me at [clorenz@volhawaii.com](mailto:clorenz@volhawaii.com).

Sincerely,

*Charlie Lorenz*

Charlie Lorenz  
Assistant Pastor  
Word of Life Christian Center

Mr. Charlie Lorenz  
Page Two  
May 6, 2009

- Preserve and encourage pedestrian access to the waterfront/Makai Area. Provide pedestrian pathways through large blocks.
- Creates nodes of activities and gateways at street corners. Design considerations would include special paving, building openings and active uses at corners.

The alternatives are presented in Chapter 3.10.2 of the Final SEIS and in Appendix B, Urban Design Analysis.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Chung  
Executive Director

AJHC/DN/ST:ak  
c: EDAAW, Inc.



**Comments Received**

**SEIS Preparation Notice**

**12/23/2007 to 1/22/2008**





## **STATE AGENCIES**

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LINDA LINGLE  
GOVERNOR



RUSS K. SAITO  
COMPTROLLER

BARBARA A. ANNIS  
DEPUTY COMPTROLLER

STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 119, HONOLULU, HAWAII 96810

(P)1015.8

JAN 11 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

Subject: Supplemental Environmental Impact Statement Preparation Notice (SEISPN)  
Revisions to the Kakaako Community Development District Mauka Area Plan  
and Rules ("Mauka Area Plan") – Kakaako, Oahu, Hawaii

Thank you for the opportunity to review this SEISPN. The Department of Accounting and General Services' supports this SEIS. Because we have several existing facilities within this Mauka Area Plan, we request the Hawaii Community Development Authority staff consult with and apprise us on any rules or plan changes that may affect our facilities.

In addition, the adjacent 919 Ala Moana Building (former AAFES) and parking, while not covered by this plan, are vitally important for us to serve its tenant agencies until future replacement facilities are available.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett, of the Public Works Division, at 586-0491.

Sincerely,

RUSS K. SAITO  
State Comptroller

c: Mr. Laurence K. Lau, DOH-OEQC  
Ms. Susan Tamura, HCDA

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Russ K. Saito  
State Comptroller  
Department of Accounting and General Services  
State of Hawaii  
P. O. Box 119  
Honolulu, Hawaii 96810

Dear Mr. Saito:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 11, 2008 commenting on the subject Supplemental Environmental Impact Statement Preparation Notice. Please be assured that the Department of Accounting and General Services will be kept apprised of any proposed amendments to the Mauka Area Plan and Rules.

We also acknowledge DAGS' role in serving the tenant agencies in the 919 Ala Moana Building and parking lot, located in the Kakaako Makai Area.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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12000-6

United States Department of Agriculture

RECEIVED

2008 JAN 10 PM 2 27

HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY



Natural Resources Conservation Service  
P.O. Box 50004 Rm. 4-118  
Honolulu, HI 96850  
808-541-2600

January 4, 2008

Teney K. Takahashi, Interim Executive Director  
State of Hawaii  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Teney Takahashi,

We have reviewed the Supplemental Environmental Impact Statement Preparation Notice Revision to the Kakaako Community Development District Mauka Area Plan and Rules. We have no comment to offer at this time.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence T. Yamamoto".

LAWRENCE T. YAMAMOTO  
Director  
Pacific Islands Area

*Helping People Help the Land*

An Equal Opportunity Provider and Employer

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Lawrence T. Yamamoto, Director  
Natural Resources Conservation Service  
P.O. Box 50004, Rm. 4-118  
Honolulu, Hawaii 96850

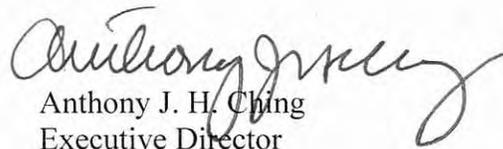
Dear Mr. Yamamoto:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 4, 2008 stating that the Natural Resources Conservation Service has no comments to offer at this time.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

677 Ala Moana Boulevard  
Suite 1001  
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## DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

LINDA LINGLE  
GOVERNOR  
THEODORE E. LIU  
DIRECTOR  
MARK K. ANDERSON  
DEPUTY DIRECTOR

STRATEGIC INDUSTRIES DIVISION  
235 South Beretania Street, Leiopapa A Kamehameha Bldg., 5<sup>th</sup> Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-3807  
Fax: (808) 586-2536  
Web site: [www.hawaii.gov/dbedt](http://www.hawaii.gov/dbedt)

January 4, 2008

EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attn: Kevin Butterbaugh

Re: Supplemental Environmental Impact Statement Preparation Notice (SEISPN)  
Revisions to the Kakaako Community Development District Mauka Area Plan and  
Rules ("Mauka Area Plan") – Kakaako, Oahu, Hawaii

Thank you for the opportunity to comment on the Supplemental Environmental Impact Statement Preparation Notice (SEISPN) Revisions to the Kakaako Community Development District Mauka Area Plan and Rules. We support the Plan's goal of creating a sustainable live, work, shop, and play urban village.

We would like to call your attention to: (1) State energy conservation goals; and, (2) energy and resource efficiency and renewable energy and resource development.

- 1. State energy conservation goals.** Project buildings, activities, and site grounds should be designed and/or retrofit with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call your attention HRS 226 18(c) (4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies.
- 2. Energy and resource efficiency and renewable energy and resource development.** We call your attention to the need for measures to enhance the sustainability of the Plan, including, among others, construction activity pollution prevention, green architecture, photovoltaic energy, solar water heating, and water conservation.

EDAW, Inc.  
January 4, 2008  
Page 2

We also encourage the Hawaii Community Development Agency to consider Leadership in Energy and Environmental Design (LEED) Neighborhood Development standards which integrate the principles of smart growth, urbanism, and green building in its revisions to the Kakaako Mauka Area Plan.

Our websites (<http://www.hawaii.gov/dbedt/info/energy/efficiency/> and <http://www.hawaii.gov/dbedt/info/energy/renewable/>) provide detailed information on guidelines, directives and statutes, as well as studies and reports on aspects of energy efficiency and renewable energy. Please also do not hesitate to contact Carilyn Shon, Energy Efficiency Branch Manager, at telephone number 587-3810, for additional information on sustainable development, energy efficiency, and renewable energy resources.

Sincerely,



Maurice H. Kaya  
Chief Technology Officer

c: OEQC  
Susan Tamura, HCDA



Ref. No.: PL EIS 6.26

HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

July 2, 2008

Mr. Maurice H. Kaya  
Chief Technology Officer  
Strategic Industries Division  
Department of Business, Economic Development & Tourism  
State of Hawaii  
235 South Beretania Street, 5<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Kaya:

Jonathan W. Y. Lai  
Chairperson

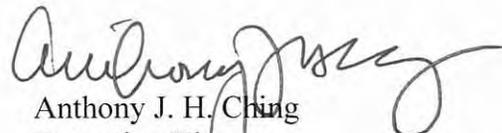
Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Anthony J. H. Ching  
Executive Director

Thank you for your letter of January 4, 2008 commenting on the subject Supplemental Environmental Impact Statement Preparation Notice. Please be assured that the revised Mauka Area Plan will promote energy efficiency and the use of renewable resources in all development projects toward the goal of creating sustainable neighborhoods. Sustainability guidelines will be incorporated into the Mauka Area Rules and Design Guidelines.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

AJHC/ST:lh

Telephone  
(808) 587-2870

c: EDAW, Inc.

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

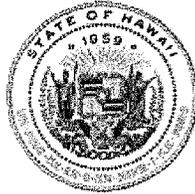
Web site  
www.hcdaweb.org

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LINDA LINGLE  
GOVERNOR

MAJOR GENERAL ROBERT G. F. LEE  
DIRECTOR OF CIVIL DEFENSE

EDWARD T. TEIXEIRA  
VICE DIRECTOR OF CIVIL DEFENSE



PHONE (808) 733-4300  
FAX (808) 733-4287

**STATE OF HAWAII**  
**DEPARTMENT OF DEFENSE**  
**OFFICE OF THE DIRECTOR OF CIVIL DEFENSE**  
3949 DIAMOND HEAD ROAD  
HONOLULU, HAWAII 96816-4495

January 22, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

Thank you for the opportunity to provide comments on the Proposed Revisions to the Mauka Area Plan and Rules. In reviewing the document, the key issues from a State Civil Defense (SCD) perspective are:

- 1) Section 2.4: Transportation. SCD would like to urge that the requirements of Hawaii's special needs population be incorporated into Transit Oriented Development areas. Specifically, visual and audio notification of impending emergencies is of high priority.
- 2) Section 2.7.2: Public Safety Proposals. SCD is tasked with ensuring and maintaining the integrity of emergency evacuation shelters and increasing said shelter spaces in proportion to an increase in population. There are currently shelters located at McKinley High School and Neil Blaisdell Center. I would like to request notification of any construction projects that would affect the shelters or access to the entrances.

Please feel free to contact Anne Stevens, SCD Domestic Preparedness Planner, at 733-4300. ext. 557, if you have any questions regarding this correspondence.

Sincerely,

  
EDWARD T. TEIXEIRA  
Vice Director of Civil Defense

c: Hawaii Community Development Authority

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Edward T. Teixeira  
Vice Director of Civil Defense  
Office of the Director of Civil Defense  
Department of Defense  
State of Hawaii  
3949 Diamond Head Road  
Honolulu, Hawaii 96816

Dear Mr. Teixeira:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 commenting on the SEIS Preparation Notice. We acknowledge that requirements of Hawaii's special needs population need to be incorporated into Transit Oriented Development ("TOD") areas.

With regard to your request for notification of construction projects that would affect emergency shelters in Kakaako, the Hawaii Community Development Authority proposes to include Oahu Civil Defense in the Project Eligibility ("PE") review phase of the permitting process. The PE review process requires developers to submit a preliminary design for review by City and State agencies to assess the impact of the project on existing and planned infrastructure capacity and potential development concerns. Participation in the PE process will allow the Oahu Civil Defense to comment on any impacts relating to accessibility of emergency shelters in Kakaako.

We appreciate your interest and participation in the consultation phase of the environmental review process.

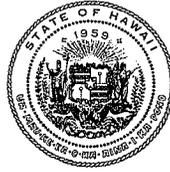
Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

January 17, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

SUBJECT: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Community Development District Mauka  
("Mauka Area Plan") - Kakaako, Oahu Hawai'i

The Department of Education (DOE) has reviewed the Supplemental Environmental Impact Statement Preparation Notice (SEISPN) for the Kakaako Mauka Area Plan. We have the following concerns:

Page 2-4, Section 2.3.2 - Development Provisions

Density:

Please identify the areas within the Mauka Area which do not have sufficient infrastructure.

Please expand the narrative in the Draft Environmental Impact Statement (DEIS) to illustrate what the higher densities in the revised plan will mean in terms of increased maximum residential population.

Building Height:

The minimum heights allowed for the Street-Front Element in the revised plan, four stories or 40 feet, limits the design options for educational facilities which may be designed at lesser heights to satisfy educational design needs.

The maximum height limits for the Mid-Height Element, 215 feet, allows for greater heights in the properties adjacent to the Pohukaina site. This will potentially impact light, views, and air movements to the future educational facility.

Please discuss how the increased heights of buildings in the Pohukaina area will impact mauka views and illustrate the view planes from the Pohukaina site.

Page 2-5, Section 2.3.3 - Parks, Open Space and Views

Please note that the grounds of McKinley High, such as the areas between school buildings, are not vacant land that can be treated as public park space. The Revised Plan designates a new pedestrian and bike path within the McKinley High property without considering alternatives routes. The campus of McKinley High is the responsibility of the Department of Education, and it is reserved solely for educational activities.

Mr. Kevin Butterbaugh  
Page 2  
January 17, 2008

Page 3-8, Section 3.4.4 Public Services, School Facilities

Two of the public schools that serve the Mauka Area, Royal Elementary and Washington Intermediate, have been omitted from the discussion in the SEISPN. Please note that Washington Intermediate is currently at facility capacity (2007-2008 school year).

Page 4-1, Section 4 - Potential Impacts and Mitigation Measures

Enrollment impacts to educational facilities are not addressed under this section.

Page, 4-1, Section 4.1.2 - Flood and Natural Hazards

Please address potential impacts to McKinley High, Queen Ka'ahumanu Elementary, and the Pohukaina site. The increased development permitted under the new plan will increase impermeable surfaces which may increase flood risks to these schools.

Page 4-1, Section 4.2.2 - Transportation

The increased development permitted under the new plan will increase traffic on the streets adjacent to McKinley High and Queen Ka'ahumanu Elementary located immediately outside of the plan area. Please address potential impacts to the ingress and egress of cars and delivery trucks accessing the schools.

Page 4-2, Section 4.2.3 - Noise

Please address the potential noise impacts from increased construction activities and increased traffic after buildout to McKinley High, Queen Ka'ahumanu Elementary, and the future Pohukaina Elementary schools.

The Mauka Plan revisions will increase the population of Kakaako with desired populations such as workforce families but will not provide any more open, public, or recreational space. There is no discussion of any additional open space or park land. Please address how this will place increased pressure on the McKinley High and Pohukaina campuses for use as recreational facilities since no new playgrounds or recreational facilities for students from pre-school through high school are included.

Thank you for the opportunity to review this document. If you have any questions, please call Heidi Meeker of our Facilities Development Branch at 377-8301.

Sincerely yours,



Duane Y. Kashiwai  
Public Works Administrator  
Facilities Development Branch

DYK:jmb

c: Raelene Chock, Ed.D., CAS - McKinley/Roosevelt Complex Areas  
Susan Tamura, Hawaii Community Development Authority



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
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96813

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(808) 587-2870

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(808) 587-8150

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Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Duane Y. Kashiwai, Public Works Administrator  
Facilities Development Branch  
Department of Education  
State of Hawaii  
P. O. Box 2360  
Honolulu, Hawaii 96804

Dear Mr. Kashiwai:

Re: Supplemental Environmental Impact Statement Preparation Notice,  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 17, 2008 commenting on the subject  
SEIS Preparation Notice. We offer the following in response to your comments.

Development Provision:

- The Draft SEIS will include a discussion and map of areas with insufficient infrastructure capacity. Information on density and projections of maximum residential population will also be included in the Draft SEIS.
- The Draft SEIS will include an assessment of the Street-Front and Mid-Height element and its impact on Mauka views and view planes from the Mother Waldron Park.

Parks, Open Space and Views:

- The Draft Mauka Area Plan does not consider the grounds of the McKinley High School as a public park space. The McKinley High School campus contains the most significant publicly-owned outdoor recreational facilities in the Mauka Area, including softball and baseball fields, tennis courts, basketball and volleyball courts, and a football/soccer field surrounded by a track. The facilities are primarily used for the school's physical education and athletic programs. However, with the prior permission of the school administration, the facilities are available for general community use. The Draft Mauka Plan proposes a more formal joint school-community agreement that includes the use of HCDA's public facilities dedication funds to improve the athletic facilities.

Mr. Duane Y. Kashiwai  
Department of Education  
July 2, 2008  
Page 2

- The proposed bike path connecting the Mauka Area with the City and County of Honolulu's Young Street bike facility will be assessed in the Draft SEIS. Your comment that the campus of McKinley High School is the responsibility of the Department of Education and it is reserved solely for educational activities is noted.
- Strategies for meeting recreational needs of the Kakaako district will be discussed in the Draft SEIS.

Public Services, School Facilities:

- Public schools that serve the Mauka Area, including Royal Elementary and Washington Intermediate, will be included in the Draft SEIS.
- Impacts on school enrollment will be addressed in the Draft SEIS.

Flood and Natural Hazards:

Potential flood impacts to the Mauka Area, including McKinley High School, Queen Kaahumanu Elementary and the Pohukaina Elementary School site, will be discussed in the Draft SEIS. The Revised Mauka Area Plan does not propose 'increased development' in relation to what is already allowed under the existing Mauka Area Plan. Proposed densities and heights are consistent with the existing Mauka Area Plan.

Transportation:

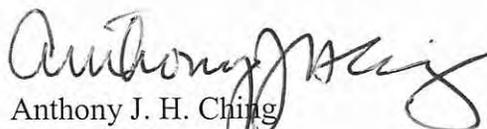
A transportation analysis will be included in the Draft SEIS. The transportation analysis will assess future traffic projection based on existing and planned roadways within the Mauka Area.

Noise:

Potential noise impacts resulting from increased construction activities and increased traffic will be addressed in the DSEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

LINDA LINGLE  
GOVERNOR OF HAWAII



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

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

In reply, please refer to:  
EPO-07-243

January 16, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

SUBJECT: Supplemental Environmental Impact Statement Preparation Notice for Revision to the Kakaako Community Development District Mauka Area Plan and Rules Honolulu, Oahu, Hawaii  
TMK: (1) 2-1-29: 30, 31, 32, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55 and 56  
(1) 2-3-01: 02, 03, 04, 05, 06, 07, 08, 09, 10 and 11

Thank you for allowing us to review and comment on the subject document. We would like to receive three copies of the Draft Environmental Impact Statement (Draft EIS) and will make comments on the Draft EIS.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kelvin H. Sunada".

KELVIN H. SUNADA, MANAGER  
Environmental Planning Office

c: EPO  
Ms. Susan Tamura, Hawaii Community Development Authority

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

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Web site  
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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Kelvin H. Sunada, Manager  
Environmental Planning Office  
State of Hawaii  
Department of Health  
P.O. Box 3378  
Honolulu, Hawaii 96801

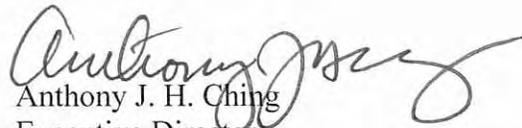
Dear Mr. Sunada:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Notice, Kakaako, Oahu, Hawaii

Thank you for your letter of January 16, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. As requested, three copies of the Draft SEIS shall be provided to you for your review and comment.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

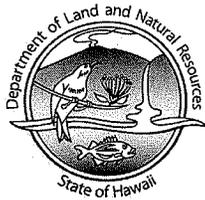
c: EDAW, Inc.

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LINDA LINGLE  
GOVERNOR OF HAWAII



Laura H. Thielen  
Chairperson  
Board of Land and Natural Resources  
Commission on Water Resource Management



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

January 15, 2008

EDAW, Inc.  
841 Bishop Street Suite 1910  
Honolulu, Hawaii 96813

Attention: Mr. Kevin Butterbaugh

Gentlemen:

Subject: Supplemental Environmental Impact Statement Preparation Notice,  
revisions to the Kakaako Community Development District Mauka Area  
Plan and Rules

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Engineering Division, Division of State Parks, Land Division-Oahu District, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Morris M. Atta".

Morris M. Atta  
Administrator

LINDA LINGLE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION  
LAURA H. THIELEN  
CHAIRPERSON  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

2008 JAN 14 P 3:48

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

December 28, 2007

MEMORANDUM

- TO: **DLNR Agencies:**
- Div. of Aquatic Resources
  - Div. of Boating & Ocean Recreation
  - Engineering Division
  - Div. of Forestry & Wildlife
  - Div. of State Parks
  - Commission on Water Resource Management
  - Office of Conservation & Coastal Lands
  - Land Division – Oahu District

FROM: *for* Morris M. Atta *Maalene*

SUBJECT: Supplemental Environmental Impact Statement Preparation Notice, Revisions to the Kakaako Community Development District Mauka Area Plan and Rules

LOCATION: Kakaako, Hawaii

APPLICANT: EDAW, Inc. on behalf of Hawaii Community Development Authority

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by January 15, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *C. J. Heine*

Date: 1/14/08

07 DEC 31 AM 10:52 ENGINEERING

DEPARTMENT OF LAND AND NATURAL RESOURCES  
ENGINEERING DIVISION

LD/Moris Atta  
Ref.: SEISPN, RevKakaakoDevMaukaPlan  
Oahu.592

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zones A and AE. The National Flood Insurance Program does regulate developments within Zones A and AE as indicated in bold letters below.
- ( ) Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone \_\_\_\_.
- ( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is \_\_\_\_.
- (X) Please note that the project site must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- (X) Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
- ( ) Mr. Kelly Gomes at (808) 961-8327 (Hilo) or Mr. Kiran Emler at (808) 327-3530 (Kona) of the County of Hawaii, Department of Public Works.
- ( ) Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
- ( ) Mr. Mario Antonio at (808) 241-6620 of the County of Kauai, Department of Public Works.
- (X) The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- (X) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

- ( ) Additional Comments: \_\_\_\_\_
- ( ) Other: \_\_\_\_\_

Should you have any questions, please call Ms. Suzie S. Agraan the Planning Branch at 587-0258.

Signed:   
ERIC T. HIRANO, CHIEF ENGINEER

Date: 1/14/68

51021

LINDA LINGLE  
GOVERNOR OF HAWAII

LAURA H. THIELEN  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

RECEIVED  
STATE PARKS DIV

'08 JAN -3 A8:33

December 28, 2007

DEPT OF LAND &  
NATURAL RESOURCES

MEMORANDUM

TO: **DLNR Agencies:**  
 Div. of Aquatic Resources  
 Div. of Boating & Ocean Recreation  
 Engineering Division  
 Div. of Forestry & Wildlife  
 Div. of State Parks  
 Commission on Water Resource Management  
 Office of Conservation & Coastal Lands  
 Land Division – Oahu District

RECEIVED  
LAND DIVISION  
2008 JAN -8 A 10:29  
DEPT OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

FROM: *for* Morris M. Atta *Maalene*  
SUBJECT: Supplemental Environmental Impact Statement Preparation Notice, Revisions to the Kakaako Community Development District Mauka Area Plan and Rules  
LOCATION: Kakaako, Hawaii  
APPLICANT: EDAW, Inc. on behalf of Hawaii Community Development Authority

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by January 15, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*  
Date: 1/4/08



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

December 28, 2007

MEMORANDUM

From: ~~TO:~~

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District

TO: ~~FROM:~~

*for*  
Morris M. Atta *Thielen*

**SUBJECT:** Supplemental Environmental Impact Statement Preparation Notice, Revisions to the Kakaako Community Development District Mauka Area Plan and Rules

**LOCATION:** Kakaako, Hawaii

**APPLICANT:** EDAW, Inc. on behalf of Hawaii Community Development Authority

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by January 15, 2008.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *Jay*  
Date: 1/2/08

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Morris M. Atta, Administrator  
Land Division  
State of Hawaii  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809

Dear Mr. Atta:

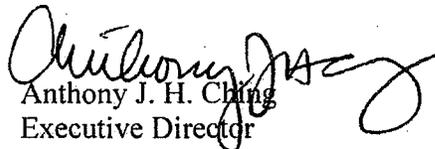
Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Notice, Kakaako, Oahu, Hawaii

Thank you for your letter of January 15, 2008 forwarding comments from respective Divisions of the Department of Land and Natural Resources. We acknowledge the Engineering Divisions comment that the project site is located in flood hazard zones "A" and "AE." The project site will comply with the rules and regulations of the National Flood Insurance Program as presented in Title 44 of the Code of Federal Regulations, whenever development within a Special Flood Hazard area is undertaken.

We acknowledge that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage. The Hawaii Community Development Authority will submit projected water demands and calculations to the Engineering Division, so it can be included in the State Water Projects Plan Update.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:ll

c: EDAW, Inc.

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

IN REPLY REFER TO:  
**DIR 1610**  
**STP 8.2747**

January 18, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

**Subject: Supplemental Environmental Impact Statement Preparation Notice (SEISPN)  
Kakaako Mauka Area Plan and Rules, Kakaako Community Development District**

The State Department of Transportation (DOT) submits the following comments on the Hawaii Community Development Authority (HCDA) development plan and subject SEISPN:

1. The development of the Mauka Area will impact DOT highway and harbor facilities. The principal impact will be to State Highway Route 92 (Nimitz Highway-Ala Moana Boulevard) due to the traffic generated by the Mauka Area development. Honolulu Harbor may be similarly impacted by the project's contribution to the cumulative traffic volumes at the harbor's roadway accesses.
2. HCDA's Makai Area developments will exacerbate the Mauka Area impacts. DOT's comments on the Makai Area developments are enclosed. HCDA's subsequent discussions with the DOT Highways and Harbors Divisions should be included in the Mauka Area's Draft EIS. Hopefully, HCDA has retained its notes of these discussions.
3. The Mauka Area Plan update should include a development plan and corresponding Traffic Impact Analysis Report (TIAR). The development plan and TIAR will enable DOT's assessment of the potential impacts of the project's full build out and its contribution to the cumulative impacts of the surrounding areas, including the Makai Area. We request that the TIAR include a roadway and circulation plan with recommended improvements and/or changes to the impacted State highway.
4. We request that at least five (5) copies of the Mauka Area Plan Draft EIS be provided for DOT staff offices' review.

Mr. Kevin Butterbaugh  
Page 2  
January 18, 2008

STP 8.2747

We appreciate being provided the SEISPN and the opportunity to provide comments.

Very truly yours,

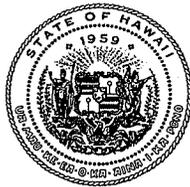
*Francis Paul Keno*

*for* BRENNON T. MORIOKA, PH.D., P.E.  
Interim Director of Transportation

Enc.

c: Susan Tamura, Hawaii Community Development Authority

LINDA LINGLE  
GOVERNOR



RODNEY K. HARAGA  
DIRECTOR

Deputy Directors  
BRUCE Y. MATSUI  
BARRY FUKUNAGA  
BRENNON T. MORIOKA  
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

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

STP 8.1802

June 23, 2005

TO: MR. DANIEL DINELL, EXECUTIVE DIRECTOR  
HAWAII COMMUNITY DEVELOPMENT AUTHORITY  
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT  
AND TOURISM

ATTN: SUSAN TAMURA

FROM: RODNEY K. HARAGA   
DIRECTOR OF TRANSPORTATION

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT  
MAKAI AREA PLAN AMENDMENT, HAWAII COMMUNITY  
DEVELOPMENT DISTRICT

Thank you for providing a copy of the subject Draft Environmental Assessment (Draft EA) and copies of the traffic assessment (titled as the "Transportation Plan") on the Makai Area project for our review. We have the following initial comments:

1. The Draft EA and Transportation Plan recommend significant changes to the State and County roads within the project area which will impact our Harbors and Highways facilities. The recommended changes will need to be further discussed and coordinated with your agency, the City and County of Honolulu and our Department.
2. The Transportation Plan should discuss the traffic impacts from developments or projects in the Development District's Mauka Area and Makai Area through to the Year 2025, including Victoria Ward Estate/General Growth Properties in the Mauka Area.
3. The Transportation Plan should identify interim mitigation measures and roadway/intersection improvements in the event the schedule of anticipated projects and developments in Mauka and/or Makai Areas of the Development District are delayed or modified.
4. The Draft EA shows that the existing Hawaiian Electric Honolulu (Downtown) Power Plant is part of the Makai Area. The Draft EA and Transportation Plan should discuss the potential change to the site, roadways and surrounding lands in the event the electric

Mr. Daniel Dinell

STP 8.1802

Page 2

June 23, 2005

plant is moved. (As a side note, the DOT is opposed to the relocation of the HECO plant to Sand Island).

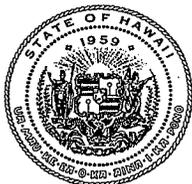
The potential future changes in the Makai Area and recommended roadway and intersection changes outlined in the Draft EA and Transportation Plan are significant. They can have an impact to Honolulu Harbor from Piers 1 to 9 and Nimitz Highway-Ala Moana Boulevard from Bishop Street to Piikoi Street. Because of the extent and number of impacts, we are awaiting additional technical comments from our Harbors and Highways staff which we will forward to you as soon as we receive them.

We appreciate the opportunity to provide our comments.

DS:km

c: Genevieve Salmonson, Office of Environmental Quality Control  
Rodney Funakoshi, Wilson Okamoto Corporation

LINDA LINGLE  
GOVERNOR



RODNEY K. HARAGA  
DIRECTOR

Deputy Directors  
BRUCE Y. MATSUI  
BARRY FUKUNAGA  
BRIAN H. SEKIGUCHI

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

IN REPLY REFER TO:

STP 8.1537

January 7, 2005

Mr. Rodney Funakoshi, AICP  
Project Manager  
Wilson Okamoto Corporation  
1907 S. Beretania Street, Suite 400  
Honolulu, Hawaii 96826

Dear Mr. Funakoshi:

Subject: Pre-Assessment Consultation  
Kakaako Community Development District  
Makai Area Plan and Rules Amendment

Thank you for your consultation letter of December 20, 2004.

The proposed amendments for the Makai Area of the Kakaako Community Development District may generate traffic impacts in the area along Ala Moana Boulevard. We understand that your firm will prepare a traffic impact assessment and we request that at least four (4) copies of the assessment report be provided to our Department for our review and comment.

We appreciate the courtesy of your advance notice and for the opportunity to provide our comments.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Rodney K. Haraga", with a long horizontal stroke extending to the right.

RODNEY K. HARAGA  
Director of Transportation

DS:km

c: Susan Tamura, Hawaii Community Development Authority

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Brennon T. Morioka, PH.D., P.E., Director  
Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Mr. Morioka:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 18, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice.

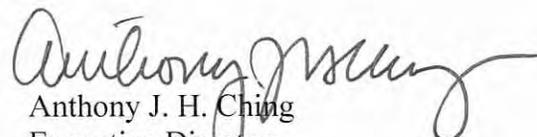
We acknowledge that traffic along State Highway Route 92 ("Nimitz Highway-Ala Moana Boulevard") and the harbor facilities will be impacted by the redevelopment of the Mauka Area. The Draft SEIS will include a transportation analysis of the proposed revisions to the Mauka Area Plan, including an impact assessment of Nimitz Highway-Ala Moana Boulevard.

The discussions between the Hawaii Community Development Authority and the Department of Transportation during the Makai Area planning process have been incorporated into the Transportation Analysis for the Mauka Area.

As requested, five copies of the Draft SEIS shall be provided to you for your review and comment.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

HRD07/3459

January 15, 2008

Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawai'i 96813

**RE: Supplemental Environmental Impact Statement (SEIS) Preparation Notice, Revisions to the Kaka'ako Community Development District, Mauka Area Plan and Rules, Kaka'ako, O'ahu.**

Dear Mr. Butterbaugh,

The Office of Hawaiian Affairs (OHA) is in receipt of the above referenced request for comments concerning a SEIS regarding revisions to the Kaka'ako Community Development District Mauka area plan and rules.

Many of the lands that this project would impact are ceded lands. As such, we request that they be treated with the respect due to them, as they are part of the 1.8 million acres of land that belong to the Hawaiian monarchy and were transferred to the state when Hawai'i became a U.S. state. In addition, OHA urges that future documents refer to these parcels as ceded lands so that their special status is known to others and to facilitate their continued registry and the creation and maintenance of an accurate ceded lands inventory. Moreover, because these lands are ceded, OHA is sensitive to their proposed use and it is with this sentiment that we offer the following comments:

OHA understands that:

The vision for the Kakaako Community Development District is to create a vibrant community where people are able to live, work, shop, and play in close proximity. The intent of the revised Mauka Area Plan is to provide the necessary guidance in planning for a high quality urban community that also promotes positive economic development, preserves Honolulu's diverse cultural heritage, and incorporates best practices in energy and environmental sustainability.

In order to do this, the Hawaii Community Development Authority (HCDA) intends to be guided by three key principles:

- (1) develop urban village neighborhoods where people can live, work, shop and play;
- (2) create great public places; and
- (3) make connections by providing convenient access to a wide range of services and activities via walking, bicycling, driving or transit.

Of course OHA is in support of these wonderful ideas and goals for Kaka'ako. However, we are not sure how they will come to fruition, and the SEIS is unclear as to specific implementation. OHA asks that the EIS bring clarity to this issue.

For example, the third guiding principle specifically mentions bicycling, yet section 2-7 *Bicycle Facilities* is only two sentences long (and one of them is conditional). If bicycling truly is part of the three 'guiding principles' then OHA wonders why there is only one new bicycle corridor being considered. OHA would expect to see plans for dedicated bicycle lanes along major transit routes into and through Kaka'ako to implement and achieve this goal. This would also match with section 2.4 *Transportation*.

Regarding section 2.4, OHA notes that upgrades are being proposed for streets, including drainage systems. Generally, OHA wishes to see stormwater as a resource to be captured and conserved rather than a nuisance to be channeled and drained away. As stormwater travels down a drainage system, it accumulates industrial waste, pesticides, oils, and chemicals. These pollutants quickly settle into the nearshore sediments and are re-suspended into the water column when disturbed.

Persistent organic pollutants (POPs) are organic compounds that linger in the environment, travel through the food web, and pose risks to human health and the environment. Organic hydrocarbons, including petroleum products, are examples of POPs. POPs are most commonly introduced to marine systems via discharged sewage and stormwater effluent, terrestrial runoff, and oil spills. POPs can also bioaccumulate in the nearshore species that inhabit these areas. The Kaka'ako Drainage Channel is a large source of such pollutants into our nearshore waters. (OHA also recommends that the Kaka'ako drainage channel be altered from its smooth bottom with the addition of berms, blocks, or recessed 'checkerboards' to further reduce the introduction of sediments and turbidity.)

As such, OHA recommends the use of a stormwater management system that would filter these pollutants out and slow the amount of sediments entering our waters. OHA knows that this channel is comprised entirely of cement and is absent of any vegetation. OHA

recommends allowing "thick" vegetation or "buffer strips" to grow alongside the waterway and wherever possible to filter and slow runoff and soak up pollutants. Trees, shrubs, and groundcover absorb up to fourteen times more rainwater than a grass lawn and they don't require fertilizer.<sup>1</sup>

Further, the following four water management methods and erosion control structures are used by the Food and Agriculture Organization of the United Nations<sup>2</sup>:

- runoff harvesting (catching runoff for supplementary irrigation);
- total absorption or infiltration;
- runoff diversion (redirecting excess water);
- runoff spreading (distribution of runoff energy).

OHA recommends using retention and detention ponds where possible. Retention ponds are basins that catch runoff from higher elevation areas. A detention pond detains water during rainy periods. They are designed to help control runoff and limit flooding during high water times. A detention pond will hold water for a short period of time and slowly releases it. A retention pond will typically have an overflow pipe so it doesn't get too high, but there is typically water in it at all times. These could be aesthetically placed in any of the proposed public and park zones.

If retention ponds are used, they should be shallow with slow sloping bottoms. The slow sloping sides are needed for safety if people happen to fall in. A surrounding area around the pond will provide adequate area for water storage when heavy rains are present. Often times, retention and detention ponds will be installed near each other in a row. The water will get held up in the detention pond and slowly drain into the retention pond. The detention pond will help eliminate flooding and the retention will hold the remaining water. The use of permeable paving materials can also retain some of the rain that falls and catch basins can capture and help to slow the runoff thereby reducing turbidity and sediment runoff.

Retention and detention ponds also serve to remove pollutants, such as POPs and trash. Since retention and detention ponds are the drainage basin for an area, pollutants, trash and debris are washed into these areas often after heavy rains or wind rather than entering the nearshore environment.

Inflow of storm runoff through manhole covers, particularly in areas that are inundated due to poor drainage, can also be significant. Therefore, OHA recommends the outfitting

---

<sup>1</sup> See Maryland's Stormwater Management Program at:  
<http://www.mde.state.md.us/Programs/WaterPrograms/SedimentandStormwater/index.asp>

<sup>2</sup> See <http://www.fao.org/docrep/T1765E/t1765e0n.htm>

of manholes with "rain stopper" inserts to minimize the amount of rainwater entering the manhole cover pick-holes and leaking between the cover and frame. Substantial inflow could potentially also enter manholes below the frame due to misalignment, damaged mortar or cone, or other problems. In some cases, rain induced infiltration may also enter through the manhole cone if the surrounding soil is highly permeable and the cone exhibits porous brick mortar joints. OHA recommends taking corrective actions to repair and address these impacts to our nearshore environment.

OHA sees the above recommendations as aligning with section 3.1.5 *Water Quality* of the SEIS which states,

Honolulu Harbor is a receiving basin for a number of pollution sources that account for its generally poor quality. Nuuanu and Kapalama Streams contribute sediment deposits, industrial waste and urban runoff. Other pollution sources are oil refinery activities, numerous storm drains, thermal pollution, effluent from a marine research center, and ship activity within the harbor.

These suggestions are also in keeping with section 3.3.3 *Hydrology, Drainage, and Water Supply* and the vision of the HDCA for environmental sustainability.

OHA is pleased to read that work will stop and the State Historic Preservation Division will be contacted should iwi kūpuna or cultural artifacts be uncovered. We are also aware that there are a number of cemeteries and iwi kūpuna repatriation sites in the area that should be considered for the Historic Site Proposed Action list in section 2.6 *Historic and Cultural Resource Plan*.

OHA is also eager to read section 3.2.2 *Cultural Practices and Traditions*, which promises a Cultural Impact Assessment in the Draft SEIS, as required under Hawaii Revised Statutes, chapter 343.

OHA also is interested in section 2.8 *Relocation Plan* which anticipates "a certain degree of relocation" to facilitate the proposed projects goals. OHA queries as to whether the "meaningful relocation assistance", "counseling, information, and referral services to displacees" are intended to benefit the numerous homeless of Kaka'ako which will be affected by this proposed project.

Thank you for the opportunity to comment. We look forward to more information as it becomes available. If you have any further questions or concerns, please contact Grant Arnold at (808) 594-0263 or [granta@oha.org](mailto:granta@oha.org).

Kevin Butterbaugh  
EDAW, Inc.  
January 15, 2008  
Page5

Sincerely,

A handwritten signature in black ink, appearing to read "Clyde W. Nāmu'o", with a decorative flourish at the end.

Clyde W. Nāmu'o  
Administrator

C: Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawai'i 96813

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

July 2, 2008

Linda Lingle  
Governor

Mr. Clyde W. Namu'o, Administrator  
Office of Hawaiian Affairs  
State of Hawaii  
711 Kapiolani Boulevard, Suite 500  
Honolulu, Hawaii 96804

Dear Mr. Namu'o:

Jonathan W. Y. Lai  
Chairperson

Re: Supplemental Environmental Impact Statement Preparation Notice,  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Anthony J. H. Ching  
Executive Director

Thank you for your letter of January 15, 2008 commenting on the subject SEIS Preparation Notice. We offer the following in response to your comments.

The Mauka Area Plan will affect ceded land within the Mauka Area. However, we envision that the proposed revisions to the Mauka Area Plan will enhance the community by creating a live, work, play environment for residents and visitors. Our records indicate that there are five properties within the Mauka Area with ceded status. Of the five properties, two sites are designated as 'revenue producing' Section 5B Lands. The sites include the following:

Site	TMK	Status
Department of Transportation Building	1-2-1-31:012	5A
Department of Accounting and General Services Parking Garage	1-2-1-31:010	5A
Department of Land and Natural Resources	1-2-1-51: por of 009	5B
Mother Waldron Playground	1-2-1-51:006	5B
McKinley High School	1-2-1-9:001	5A

As requested, the Draft SEIS will include a discussion on the bicycle facilities.

With respect to storm drainage systems, an Infrastructure Master Plan is being prepared in conjunction with the Draft SEIS. Your suggestions of utilizing vegetation to grow alongside the Kakaako Drainage Canal to filter and soak up

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

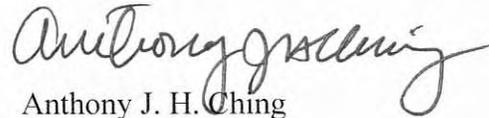
Web site  
www.hcdaweb.org

Mr. Clyde W. Namu`o  
Office of Hawaiian Affairs  
July 2, 2008  
Page 2

pollutants, utilizing retention and detention ponds where possible, outfitting manholes with 'rain stopper' inserts to minimize rainwater from entering the manholes will be taken under consideration.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

## **ELECTED OFFICIALS**

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# The Senate

STATE CAPITOL  
HONOLULU, HAWAII 96813

January 22, 2008

Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop St., Suite 1910  
Honolulu, HI 96813

Dear Mr. Butterbaugh:

Thank you for the opportunity to comment on the Supplemental Environmental Impact Statement (SEIS) Preparation Notice for **Revisions to the Kakaako Community Development District Mauka Area Plan and Rules.**

The SEIS should address the effectiveness of the revised plan in meeting one of the key purposes of Chapter 206E: to preserve light industrial, wholesaling, commercial and related uses in Kakaako Mauka. The adverse impacts of the Mauka Plan and mass transit planning upon small businesses and small property owners in the area need to be evaluated in the SEIS.

While revisions to the plan have become necessary with the changes in the area since it was first prepared, every effort should be made to ensure that the SEIS considers the unique character of the Kakaako Mauka area.

Sincerely,

Senator Suzanne Chun Oakland  
District 13

Senator Carol Fukunaga  
District 11

Representative Tom Brower  
District 23

Representative Karl Rhoads  
District 28

cc: Susan Tamura, HCDA

COLLEEN HANABUSA  
PRESIDENT

DONNA MERCADO KIM  
VICE PRESIDENT

GARY L. HOOSER  
MAJORITY LEADER

FRED HEMMINGS  
MINORITY LEADER

FIRST DISTRICT  
LORRAINE R. INOUE

SECOND DISTRICT  
RUSSELL S. KOKUBUN

THIRD DISTRICT  
PAUL WHALEN

FOURTH DISTRICT  
SHAN S. TSUTSUI

FIFTH DISTRICT  
ROSALYN H. BAKER

SIXTH DISTRICT  
J. KALANI ENGLISH

SEVENTH DISTRICT  
GARY L. HOOSER

EIGHTH DISTRICT  
SAM SLOW

NINTH DISTRICT  
LES IHARA, JR.

TENTH DISTRICT  
BRIAN T. TANIGUCHI

ELEVENTH DISTRICT  
ROL FUKUNAGA

TWELFTH DISTRICT  
GORDON TRIMBLE

THIRTEENTH DISTRICT  
SUZANNE CHUN OAKLAND

FOURTEENTH DISTRICT  
DONNA MERCADO KIM

FIFTEENTH DISTRICT  
NORMAN SAKAMOTO

SIXTEENTH DISTRICT  
DAVID Y. IGE

SEVENTEENTH DISTRICT  
RON MENOR

EIGHTEENTH DISTRICT  
CLARENCE K. NISHIHARA

NINETEENTH DISTRICT  
MIKE GABBARD

TWENTIETH DISTRICT  
WILL ESPERO

TWENTY-FIRST DISTRICT  
COLLEEN HANABUSA

TWENTY-SECOND DISTRICT  
ROBERT BUNDA

TWENTY-THIRD DISTRICT  
CLAYTON HEE

TWENTY-FOURTH DISTRICT  
JILL N. TOKUDA

TWENTY-FIFTH DISTRICT  
FRED HEMMINGS

CHIEF CLERK  
CAROL TANIGUCHI



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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96813

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Ref. No.: PL EIS 6.26

July 2, 2008

The Honorable Suzanne Chun Oakland  
State Senate  
District 13  
State Capitol  
Honolulu, Hawaii 96813

Dear Senator Chun Oakland:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. The Draft SEIS will include an assessment of the revised Mauka Area Plan's effectiveness in preserving light industrial, wholesaling, commercial and related uses in the Mauka Area. Impacts of the Revised Mauka Area Plan on small businesses will also be included in the Draft SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
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Ref. No.: PL EIS 6.26

July 2, 2008

The Honorable Karl Rhoads  
House of Representatives  
District 28  
State Capitol  
Honolulu, Hawaii 96813

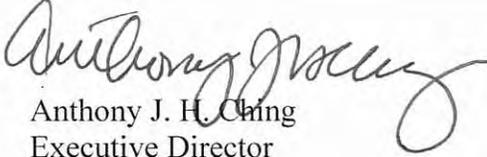
Dear Representative Rhoads:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. The Draft SEIS will include an assessment of the revised Mauka Area Plan's effectiveness in preserving light industrial, wholesaling, commercial and related uses in the Mauka Area. Impacts of the Revised Mauka Area Plan on small businesses will also be included in the Draft SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

July 2, 2008

The Honorable Tom Brower  
House of Representatives  
District 23  
State Capitol  
Honolulu, Hawaii 96813

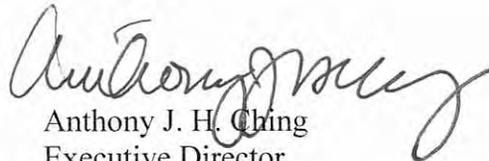
Dear Representative Brower:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. The Draft SEIS will include an assessment of the revised Mauka Area Plan's effectiveness in preserving light industrial, wholesaling, commercial and related uses in the Mauka Area. Impacts of the Revised Mauka Area Plan on small businesses will also be included in the Draft SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

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Ref. No.: PL EIS 6.26

July 2, 2008

The Honorable Carol Fukunaga  
State Senate  
District 11  
State Capitol  
Honolulu, Hawaii 96813

Dear Senator Fukunaga:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. The Draft SEIS will include an assessment of the revised Mauka Area Plan's effectiveness in preserving light industrial, wholesaling, commercial and related uses in the Mauka Area. Impacts of the Revised Mauka Area Plan on small businesses will also be included in the Draft SEIS.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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**CITY AND COUNTY OF HONOLULU**

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# BOARD OF WATER SUPPLY

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



January 17, 2008

MUFI HANNEMANN, Mayor

RANDALL Y. S. CHUNG, Chairman  
SAMUEL T. HATA  
ALLY J. PARK  
ROBERT K. CUNDIFF  
MARC C. TILKER

CRAIG I. NISHIMURA, Ex-Officio  
BRENNON T. MORIOKA, Ex-Officio

CLIFFORD P. LUM  
Manager and Chief Engineer

DEAN A. NAKANO  
Deputy Manager and Chief Engineer

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh;

**Subject: Your Letter Dated December 21, 2007 Regarding the Supplemental Environmental Impact Statement Preparation Notice Revisions to the Kakaako Community Development District Mauka Area Plan and Rules ("Mauka Area Plan")**

---

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

The existing water system is presently adequate to accommodate the proposed development. However, please be advised that this information is based upon current data and, therefore, the Board of Water Supply reserves the right to change any position or information stated herein up until the final approval of your building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

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,

KEITH S. SHIDA  
Program Administrator  
Customer Care Division

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Keith S. Shida  
Program Administrator  
Board of Water Supply  
630 South Beretania Street  
Honolulu, Hawaii 96813

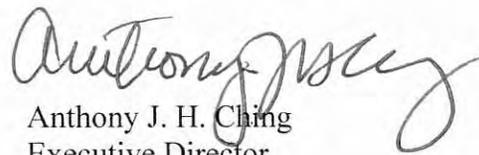
Dear Mr. Shida:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated January 2, 2008 stating that the existing water system is presently adequate to accommodate the proposed project. We acknowledge that the final decision on the availability of water will be confirmed when the building permit application is submitted.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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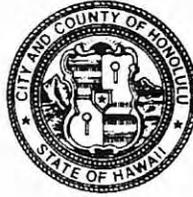
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12064-27

**DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 11<sup>TH</sup> FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8480 • Fax: (808) 523-4567  
Website: [www.honolulu.gov](http://www.honolulu.gov)

MUFI HANNEMANN  
MAYOR



EUGENE C. LEE, P.E.  
DIRECTOR

DEPUTY DIRECTOR

RECEIVED  
2008 FEB 5 PM 2 32  
HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

February 1, 2008

Mr. Teney K. Takahashi  
Interim Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Takahashi:

Subject: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Community Development District  
Mauka Area Plan and Rules ("Mauka Area Plan")  
Kakaako, Oahu, Hawaii

Thank you for giving us the opportunity to comment on the subject Supplemental Environmental Impact Statement Preparation Notice Revisions (EISPN).

The Department of Design and Construction has the following comments:

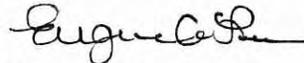
- The Kakaako Community Development District is lacking community-based type park facilities for active recreational use. We recommend that the Hawaii Community Development Authority (HCDA) follow the example of the City and County of Honolulu's Park Dedication Ordinance as a formula to create additional park facilities appropriate for the projected population growth.
- For instance, since the enactment of the Park Dedication Ordinance, the City has generally found its community-based park land objectives have been achieved in Central Oahu. For the already intensively developed Honolulu Primary Urban Center (PUC), the City has found that accepting a payment of a fee in lieu of a land set-aside is the only feasible way for most developers to meet the park dedication requirements due to the relatively small scale of individual redevelopment and in-fill projects.
- The Kakaako Community Development District is an area ripe for large-scale redevelopment and new development, especially of new residential housing units. Therefore, it has a great opportunity to also provide more community-based park lands to reduce the shortage of and impact on the City's PUC park infrastructure nearby.

Mr. Tenney K. Takahashi  
Page 2  
February 1, 2008

- The present population of nearly 9,000 (year 2000) and growth rate (36% between 1990 and 2000) for the subject area indicate a pressing need for two Neighborhood type parks (each four to six acres in size) and one Community type park (10 acres in size), based upon the City's adopted standards (enclosed). The existing Mother Waldron Park is only three acres in size, and according to the Supplemental EISPN, even that park is planned to be reduced to two acres in size and converted to "passive" use.
- The HCDA should also consider adopting park standards similar to those of the City and County of Honolulu, referenced above and attached. This would ensure adequate provision for a mixture of active, as well as more passive, recreational park facilities as the Kakaako Development District continues to be redeveloped and rehabilitated and the population housed within it continues to grow.

Should you have any questions, please contact Clifford Lau, Chief of our Facilities Division, at 768-8478.

Very truly yours,



Eugene C. Lee, P.E.  
Director

ECL:ei (242032)

Enclosures

c: Robert Sumitomo, Department of Planning and Permitting

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

	MINI PARKS	NEIGHBORHOOD PARKS	COMMUNITY PARKS	DISTRICT PARKS	OTHER: URBAN PARKS AND SQUARES	ISLAND-WIDE PARKS	LINKAGES
	← 2 acres → *Land Dedication = 350 sq. ft./dwelling unit - Residential Zone 110 sq. ft./dwelling unit - Apartment Zone						
Service Area Population	—	approximately 5,000	approximately 10,000	approximately 25,000	(10% of maximum floor area for business districts)	County Parks: (8) acres State Parks: resources based	BIKEWAYS, PEDESTRIAN WAYS, HORSE AND HIKING TRAILS, AND TRANSPORTATION SERVICES
Average Site Size		4-6 acres	10 acres	20 acres	—	<u>Park Types</u> <u>Regional Parks</u> large recreation complexes, camping and vacationing (beach, inland or urban sites)	
Service Area	*½ mile	*½ mile	*1 mile	*2 miles	—	<u>Beach and Shoreline Parks</u> day-use parks primarily for swimming, sunbathing, and picnicking <u>Nature Parks and Reserves</u> significant, natural areas <u>Historical and Archaeological Places</u>	
School Relationship		Δ possible joint use with elementary school	Δ possible joint use with intermediate school	Δ possible joint use with intermediate and high school	—	<u>Zoos and Botanic Gardens</u> <u>Golf Courses</u> (public and semi-public) 18 holes/100,000 <u>Beach Rights-of-Way</u> approximate interval of ½ mile; ¼ mile in urban areas <u>Small Boat Harbors and Launching Ramps</u> <u>Stream Greenbelts</u>	
Basic Facilities (may be adjusted to meet particular community needs)	landscaping, benches, tables	childrens' play area 2 basketball courts 2 volleyball courts 1-2 softball fields comfort station	childrens' play area 3-4 basketball courts 3-4 volleyball courts 1-2 softball fields comfort station, recreation building	childrens' play area • 3-4 basketball courts • 3-4 volleyball courts 2 softball fields baseball field 1 soccer/football field 4-6 tennis courts 1 25-yard pool gymnasium/recreation building complex • lighted	landscaping and landscape features		
Additional Desirable Facilities	childrens' play area	shelter, passive area	passive area 1 baseball field tennis courts	passive area, jogging trail, archery	comfort station		

\* Park Dedication Ordinance, 1976

Δ Joint Use Agreement between City and State, 1966

• lighted

superintendent for approval of the building permit.

When it is determined that adequate access is not provided, the developer shall dedicate land for public access by right-of-way in fee or easement as a condition precedent to approval of the building permit.

(d) **Width of Public Access.** The minimum width of such public access shall be 12 feet, except as otherwise approved by the director upon consultation with the director of parks and recreation.

(Sec. 22-6.4, R.O. 1978 (1983 Ed.))

**Sec. 22-6.5 Dedication of access--Approval of subdivision.**

(a) **Subdivision of Land.** When it is determined that public access must be provided upon review of a subdivision application, the subdivider shall file the necessary deeds of conveyance with the department of parks and recreation or other governmental agency responsible for the maintenance and improvement of the public access. Upon written notification from the director of parks and recreation or other agency that the dedication documents have been reviewed and approved as to form and contents, the director shall grant approval to the subdivision in accordance with the subdivision rules and regulations of the city. The public access for pedestrian travel shall be clearly designated on the final map of the subdivision in accordance with the subdivision rules and regulations.

Upon approval of the subdivision, the subdivider shall file the executed deeds of dedication for conveyance of the public access, free and clear of all encumbrances, within 30 days to the city. Failure to file this document within the 30-day period, or such extension as may be granted by the director of parks and recreation, shall be a violation of the provisions of this article. Conveyance shall be in conformity with all applicable statutes, ordinances and regulations.

(b) **Multiple-Family Development.** When it is determined that public access must be provided upon review of a multiple-family development, the developer shall file a subdivision application to create the public access right-of-way or easement in accordance with the subdivision rules and regulations.

The subdivider shall file the necessary deeds of conveyance with the department of parks and recreation. Upon written notification from the director of parks and recreation that the dedication documents have been reviewed and approved as to form and content, the director shall grant approval to the subdivision in accordance with the subdivision rules and regulations.

The subdivider shall file the executed deeds of conveyance free and clear of all encumbrances upon approval of the subdivision. Upon acceptance by the city of the dedication, the director of parks and recreation shall notify the building superintendent for approval of the building permit. The right-of-way shall be clearly designated on the multiple-family development plan.

(Sec. 22-6.5, R.O. 1978 (1983 Ed.))

**Article 7. Parks and Playgrounds**

**Sections:**

- 22-7.1 Statutory authority.**
- 22-7.2 Definitions.**
- 22-7.3 Scope.**
- 22-7.4 Exceptions.**
- 22-7.5 Land area required for parks and playgrounds.**
- 22-7.6 In-lieu payment--Combination in-lieu payment and dedication.**
- 22-7.7 In-lieu payment--Determination of amount.**
- 22-7.8 Credit for parks and playgrounds.**
- 22-7.9 Rules and regulations.**

- 22-7.10 Appeals.**
- 22-7.11 Refund of fees.**
- 22-7.12 Violations and penalties.**

**Sec. 22-7.1 Statutory authority.**

This article is enacted pursuant to the authority granted by HRS Section 46-6, as amended. (Sec. 22-7.1, R.O. 1978 (1983 Ed.))

**Sec. 22-7.2 Definitions.**

For the purpose of this article, unless it is plainly evident from the context that a different meaning is intended, certain words and phrases used herein are defined as follows:

"Approval" means the final approval granted to a proposed subdivision where the actual division of land into smaller parcels is sought; provided that, where construction of a building or buildings is proposed without further subdividing an existing parcel of land, the term "approval" shall refer to the issuance of the building permit.

"City" means the City and County of Honolulu. The geographical limit shall include all that portion of the State of Hawaii commonly known as the island of Oahu and all other islands in the State of Hawaii and the waters adjacent thereto not included in any other county.

"Dedication" means conveyance of land in fee simple.

"Director" means the director of land utilization of the City and County of Honolulu.

" Dwelling unit" is as defined in the land use ordinance of the city.

"Hotel" is as defined in the land use ordinance of the city.

"Lodging unit" is as defined in the land use ordinance of the city.

"Multiple-family development" means a building or group of buildings, other than a hotel, placed on a zoning lot and containing or divided into three or more dwelling or lodging units, including planned development and cluster projects under the land use ordinance containing or divided into three more dwelling or lodging units.

"Parks and playgrounds" means areas, including beach parks, used for active or passive recreational pursuits. The areas include parks and playgrounds which implement the intent and purpose of the general plan of the city.

"Provide land in perpetuity" means conveyance of land in fee simple with the option on the part of the grantor to provide for reversionary interest.

"Subdivider" means any person who divides land as specified under the definition of subdivision or who constructs a building or group of buildings containing or divided into three or more dwelling or lodging units.

"Subdivision" means the division of improved or unimproved land into two or more lots, parcels, sites or other divisions of land for residential purposes and for the purpose, whether immediate or future, of sale, lease, rental, or transfer of title to or interest in any or all such lots, parcels, sites or division of land. The term includes resubdivision, and when appropriate to the context, shall relate to the land subdivided. The term also includes a building or group of buildings, other than a hotel, which is placed on a zoning lot, containing or divided into three or more dwelling or lodging units.

"Privately owned parks and playgrounds" means parks or playgrounds and their facilities which are not provided in perpetuity or dedicated but which are owned and maintained by or on behalf of the ultimate users of the subdivision pursuant to recorded restrictive covenants. Where the privately owned park is a part of the lot or lots on which a building or group of buildings containing or divided into three or more dwelling units or lodging units is constructed, it shall not be required that the private park or playground meet county subdivision standards, nor shall the area of the private park or playground be deducted from the area of the lot or lots for purposes of zoning or building requirements. (Sec. 22-7.2, R.O. 1978 (1983 Ed.))

**Sec. 22-7.3 Scope.**

- (a) Every subdivider, as a condition precedent to (1) the approval of a subdivision by the director or (2) issuance of a building permit for multiple-family development by the building department, shall provide land in perpetuity or dedicate land for park and playground purposes, for the joint use by the occupants of lots or units in subdivisions as well as by the public. The dedication of land for a park shall be subject to the maximum ceiling in land or money in lieu thereof, calculated in accordance with the formula designated in Sections 22-7.5 and 22-7.6. In lieu of providing land in perpetuity or dedicating land, the director may permit a subdivider to pay a fee equal to the value of land which would otherwise have had to be provided in perpetuity or dedicated, or combine the payment of fee with land to be provided or dedicated, the total value of such combination being not less than the total value of the land which would otherwise have had to be provided in perpetuity or dedicated.
- (b) The provisions of this article shall apply to all subdivision of land into two or more lots for residential purposes including developments under Section 21-8.30 and to construction of multiple-family developments. When a new building or group of buildings containing dwelling or lodging units is added to an existing multiple-family development, approved prior to the effective date of this article, the provisions of this article shall apply only to such new additions, and not to the previously approved multiple-family development.
- (c) When an existing building in a multiple-family development, approved prior to the effective date of this article, is enlarged or altered to increase the number of dwelling or lodging units, the provisions of this article apply to the number of dwelling or lodging units added to the enlarged or altered building.
- (d) When an existing building in a multiple-family development, approved prior to the effective date of this article, is enlarged or altered without increasing the total number of dwelling or lodging units and the cost of such work exceeds 50 percent of the total replacement cost of the building at the time of the building permit application, the provisions of this article shall apply to the total number of dwelling or lodging units contained in the enlarged or altered building. The 50-percent replacement cost is calculated on each individual building, and not on the total replacement cost of the multiple-family development. The percentage shall be cumulative for each building from the effective date of this article. The provisions of this article shall apply to all new or existing units in an enlarged or altered building whenever the cumulative 50-percent replacement cost is exceeded.
- (e) Upon acceptance of the land by the city, the city shall thereafter assume the cost of improvements and their maintenance. Fees received shall be disbursed for the acquisition or development of parks and playgrounds, including physical facilities.
- (f) The provisions of this article shall also apply to any change in use of buildings to multiple-family dwelling use subsequent to the effective date of this article.
- (g) In any zoning district or special design districts where mixed uses of business, commercial, office and dwelling units are permitted, the provisions of this article shall apply to all units where kitchen and bathroom facilities are provided, or electrical and plumbing systems are so located and designed, by which these units may be readily converted to dwelling units without securing a new building permit or without undertaking any major alterations or renovation work.
- (h) This article shall not apply to those units where legal documents are drawn up by the applicant to assure that the units will not be converted to dwelling units. The legal documents shall be recorded covenants running with the land and subject to the review and approval of the director of land utilization and the corporation counsel. The legal documents shall be fully executed and recorded with the appropriate state agency, and proof of such recordation shall be submitted to the director of land utilization prior to issuance of building permits.
- (i) The provisions of this article shall apply to any conversion in use of any existing non-

dwelling unit to dwelling units, and such conversion shall not be undertaken unless the provisions of this article have been met.

(Sec. 22-7.3, R.O. 1978 (1983 Ed.); Am. Ord. 96-58)

#### **Sec. 22-7.4 Exceptions.**

The provisions of this article shall not apply to the following:

(a) Subdivision of land into two or more lots only for the purpose of clarifying records, or for conveyance of portions of land and which is not and will not be developed under this subdivision application into dwelling or lodging units. The subdivider desiring such exception shall file with the director a certified statement therefor, stating fully the grounds for the exception and that the subdivided land shall not be provided with dwelling or lodging units. These conditions shall run with the land. Upon further subdivision or failure of the subdivider to comply with the conditions for the exception, the subdivider shall be required to comply with the requirements of this article;

(b) Subdivisions for a public utility, public facility or of a public nature, and which will not be provided with dwelling or lodging units;

(c) Subdivision of land into two or less residential or country lots where these lots cannot be further subdivided.

(Sec. 22-7.4, R.O. 1978 (1983 Ed.); Am. Ord. 90-2)

#### **Sec. 22-7.5 Land area required for parks and playgrounds.**

The land area required for parks and playgrounds shall be calculated as set forth in this section.

(a) Country and Residential Districts, Excluding Planned Development Housing Projects. The minimum land area in country and residential districts shall be:

(1) For subdivisions involving three or four lots: 50 square feet per dwelling or lodging unit;

(2) For subdivisions involving five lots: 100 square feet per dwelling or lodging unit;

(3) For subdivisions involving six lots: 200 square feet per dwelling or lodging unit;

(4) For subdivisions involving seven or eight lots: 300 square feet per dwelling or lodging unit; and

(5) For subdivisions involving nine or more lots: 350 square feet per dwelling or lodging unit.

For subdivision actions involving eight or fewer lots, the applicable rate shall be based on the total number of potential lots. A lot which cannot be further subdivided shall count as one potential lot. For a lot which can be further subdivided, the potential number of lots shall be determined by dividing the area of the lot by the minimum potential lot size for the zoning district.

Dwelling or lodging units shall include existing, proposed and potentially developable units, except for "ohana dwelling units" as defined in the land use ordinance of the city.

(b) Other Districts and Planned Development Projects Within Residential Districts. The minimum land area required shall be either 10 percent of the maximum permitted floor area or the following, whichever is less:

(1) Apartment, resort and mixed-use districts: 110 square feet per dwelling or lodging unit;

(2) Planned development project: 110 square feet per dwelling or lodging unit.

(c) Special District Use Precincts.

(1) Dwellings, one-family and two-family and duplex units: 350 square feet per dwelling or lodging unit, in accordance with subsection (a) above;

(2) Multiple-family dwelling: 10 percent of the maximum permitted floor area or 110 square feet per dwelling or lodging unit, whichever is less.

(Sec. 22-7.5, R.O. 1978 (1983 Ed.); Am. Ord. 90-2, 93-93)

**Sec. 22-7.6 In-lieu payment--Combination in-lieu payment and dedication.**

(a) If the director determines that dedicating or providing of land in perpetuity is not in the best interest of the city, the subdivider shall pay to the city, in lieu thereof, a fee in a sum equal to the fair market value of the area otherwise required under Section 22-7.5.

(b) If the area of land provided in perpetuity or dedicated by the subdivider and approved by the city is less than the area required under Section 22-7.5, the subdivider shall be required to pay a fee equal to the fair market value of the land area which is the difference between the land area provided in perpetuity or dedicated and the area required under Section 22-7.5.

(c) If the director determines that the subdivider shall pay a fee to the city in lieu of dedicating or providing land in perpetuity, the subdivider shall pay the fee in one of the two following ways:

(1) Payment in full of the fee prior to the director's approval of the subdivider's park dedication application; or

(2) The filing with the director of an agreement to pay the fee, such agreement to be accompanied by a financial guaranty bond from a surety company authorized to do business in Hawaii, or other security acceptable to the city to ensure payment of such fee. The agreement and surety bond or other security shall be approved by the director and the corporation counsel as to form and legality. The director of finance shall determine the acceptability of the financial guaranty bond or other security. The agreement shall set forth a certain date, not to exceed two years, within which time the fee shall be paid. The financial guaranty bond or other security that must be filed with the agreement shall be in an amount equal to the fee required under this article. The financial guaranty bond shall be in full force and effect until the fees have been paid. In case of security other than a financial guaranty bond, partial releases may be made equal to the portions of the fee paid to the city.

(d) Payment of fees shall be made to the director of finance for deposit in a special fund created and established pursuant to Section 9-202 of the Revised City Charter of Honolulu, 1984 Edition. Money in this fund shall be expended for parks and playground purposes in the following manner: Within five years from the date of receipt of the fees the city shall expend such receipts for (1) purchase of land for development of a new or expansion of existing parks and playgrounds, (2) purchase of park and playground equipment, and/or (3) improvement of existing parks and playgrounds, all according to the following locational priorities: Locational priority for creation, expansion and improvement of parks and playgrounds.

(A) Neighborhood and mini-park(s) located within one-half-mile distance from the project site shall be given the first priority.

(B) Should the creation, expansion and/or improvement of a neighborhood facility prove to be unfeasible, the second priority should be given to community park(s) located within one-mile distance of the project site.

(C) District park(s) within two-mile distance of the project site shall be considered in the event the implementation of (A) and (B) above is unfeasible.

(D) Regional parks shall have the last priority.  
(Sec. 22-7.6, R.O. 1978 (1983 Ed.))

**Sec. 22-7.7 In-lieu payment--Determination of amount.**

(a) Valuation. Valuation shall be based upon the fair market value of the land prior to its subdivision.

(b) Appraisal. If the city and subdivider fail to agree on the fair market value of the land, the value shall be fixed and established by majority vote of three land appraisers: one shall be appointed by the subdivider, one appointed by the city, and the third appointed by the first two appraisers. All appraisers shall be members of the American Institute of Real Estate Appraisers, Members Appraisal Institute, or other equal national organizations. The subdivider and the city shall equally bear the fees of appraisal and costs thereof.

(Sec. 22-7.7, R.O. 1978 (1983 Ed.))

**Sec. 22-7.8 Credit for parks and playgrounds.**

(a) Credit for Lands Dedicated or Provided in Perpetuity for Parks and Playground Purposes Prior to the Effective Date of This Article. Where lands for park and playground were dedicated or provided in perpetuity prior to the effective date of this article, such land shall be credited against the park land which could otherwise be required under Section 22-7.5.

(b) Credit for Subdivisions Where the Provisions of This Article Were Previously Met. When a subdivision is resubdivided or redeveloped, the provisions of this article shall apply to dwelling or lodging units above those units which originally complied with the provisions of this article. Credit shall be applied to such land area which would otherwise be required under Section 22-7.5, whether lands were dedicated, provided in perpetuity or fees were paid in lieu thereof.

(c) Credit for Privately Owned Parks and Playgrounds. When land is provided for a private park and playground in a subdivision and such area is to be owned and maintained, and used by the owners (including private parties and public agencies), purchasers or occupants of the subdivision, such land shall be credited against the park land area which would otherwise be required under Section 22-7.5.

(Sec. 22-7.8, R.O. 1978 (1983 Ed.))

**Sec. 22-7.9 Rules and regulations.**

The director shall promulgate rules and regulations pursuant to HRS Chapter 91 for implementation of this article. The rules and regulations shall include but not be limited to the following:

- (a) Standards and requirements applicable to providing or dedicating land for parks and playgrounds to the city;
- (b) Standards and requirements applicable to credit for private parks and playgrounds;
- (c) Procedural requirements for implementation of this article;
- (d) Administration and disbursement of fees collected for parks and playgrounds;
- (e) Standards and requirements applicable to valuation and appraisal of land when fees are to be paid.

(Sec. 22-7.9, R.O. 1978 (1983 Ed.))

**Sec. 22-7.10 Appeals.**

An aggrieved party may secure a review of any decision of the director of land utilization by appeal to the zoning board of appeals. (Sec. 22-7.10, R.O. 1978 (1983 Ed.))

**Sec. 22-7.11 Refund of fees.**

(a) Refund, or partial refund pursuant to paragraph (3) below, of the amount of fees paid to the city shall be allowed to the subdivider for subdivisions or multiple-family developments under the following circumstances:

- (1) When subdivision applications expire and become null and void, or building permits are not issued by the building department;
- (2) When subdivision or building permit applications are withdrawn; or
- (3) When the number of dwelling or lodging units for a project is reduced and the amended project plans are approved by the director.

(b) Requests for refunds shall be submitted in writing with justification and return of the approved applications and building permits to the director and shall be submitted within two years from the date of receipt of the fees by the department of land utilization of the City and County of Honolulu. If the director determines that the request meets any of the three circumstances listed above, the director of finance shall be authorized to make the refund. No interest shall be paid on any dedication fee refunded. Partial refund pursuant to

paragraph (3) above shall be determined by the director based upon the valuation method contained in this article as used to determine the original fee paid. No refund shall be made for subdivisions or multiple-family development when the method of compliance with this article is revised or amended, or when the amount of fees to be paid has changed, or the two-year time limit has lapsed.

(c) Subdivision or building permit applications considered under this article shall become null and void upon the granting of a total refund. A new application shall be required if a subdivider seeks to renew the project.  
(Sec. 22-7.11, R.O. 1978 (1983 Ed.))

#### **Sec. 22-7.12 Violations and penalties.**

Any person violating any provision of this article shall upon conviction, be punished by a fine not exceeding \$1,000.00 or by imprisonment not exceeding 30 days, or by both such fine and imprisonment. The continuance of any such violation after conviction shall be deemed a new offense for each day of such continuance. The city may maintain an action for an injunction to restrain any violation of the provisions of this article, and may take any other lawful action to prevent or remedy any violation. (Sec. 22-7.12, R.O. 1978 (1983 Ed.))

### **Article 8. Street Names**

#### **Sections:**

- 22-8.1 Authority to name streets.**
- 22-8.2 Nomenclature.**
- 22-8.3 Further requirements relative to street names.**
- 22-8.4 Procedural requirements.**
- 22-8.5 Approval.**

#### **Sec. 22-8.1 Authority to name streets.**

The authority to name streets and to approve the change of street names within the city is delegated to the director of land utilization, to be exercised in accordance with the standards set forth in this article.

(Sec. 22-8.1, R.O. 1978 (1983 Ed.); Am. Ord. 96-58)

#### **Sec. 22-8.2 Nomenclature.**

The following nomenclature shall be used in the naming of streets:

- (a) The term "freeway" shall be used to describe a divided arterial roadway for through traffic with full control of access, with grade separations at intersections. Whenever practicable, freeways shall be named after Hawaiian royalty.
- (b) The term "highway" shall be used to describe a roadway generally serving through traffic on a continuous route providing the primary access between communities. Whenever practicable, highways shall be named after Hawaiian royalty.
- (c) The term "parkway" shall be used to describe a major collector roadway, usually containing a medial strip with landscaped setback parklike areas on each side of the right-of-way, generally heavily planted with trees for its entire length.
- (d) The term "boulevard" shall be used to describe a major collector with or without a medial strip, generally shorter than a highway, usually serving through traffic on a continuous route.
- (e) The term "drive" shall be used to describe a long winding collector roadway, usually through a valley, mountainous area or plateau, having scenic qualities.
- (f) The term "street" shall be used to describe a fully improved through roadway serving local or minor collector traffic.
- (g) The term "avenue" shall be used to describe a fully improved through roadway serving local or minor collector traffic, landscaped and planted with trees.



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

Telephone  
(808) 587-2870

Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

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

Dear Mr. Lee:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 commenting on the subject  
SEIS Preparation Notice.

Your comment that the Kakaako Community Development District  
("KCDD") is lacking in community-based park facilities is noted. Under the  
KCDD Mauka Area Rules, residential developments with 20,000 square feet or  
more are required to provide 55 square feet of recreation space per dwelling unit.  
As a result of this requirement, 17 acres of private recreational space has been  
developed in the Mauka Area. The intent of this requirement is for private  
developments to meet the recreational needs of the district through on-site  
facilities. In addition, there are opportunities for large landowners in the district  
to provide additional park space for Kakaako residents and visitors.

We appreciate your interest and participation in the environmental review  
process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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12002-8

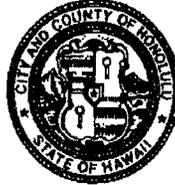
DEPARTMENT OF FACILITY MAINTENANCE RECEIVED

CITY AND COUNTY OF HONOLULU  
JAN 11 PM 2 44

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707

Phone: (808) 768-3343 • Fax: (808) 768-3381

Website: www.honolulu.gov

HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITYMUFU HANNEMANN  
MAYORCRAIG I. NISHIMURA, P.E.  
ACTING DIRECTOR AND CHIEF ENGINEERGEORGE "KEOKI" MIYAMOTO  
DEPUTY DIRECTOR

January 9, 2008

IN REPLY REFER TO:  
DRM 08-8

Mr. Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

Subject: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Community Development District, Mauka  
Area Plan and Rules ("Mauka Area Plan") – Kakaako, Oahu, Hawaii

Thank you for giving us the opportunity to comment on the Supplemental  
Environmental Impact Statement Preparation. We have no comments to offer at this  
time.

Should you have any questions, please contact Larry Leopardi, Chief of the  
Division of Road Maintenance, at 768-3600.

Sincerely,

 A handwritten signature in black ink, appearing to read "Craig I. Nishimura".
 

Craig I. Nishimura, P.E.  
Acting Director and Chief Engineer

c: Hawaii Community Development Authority  
Attn: Susan Tamura ✓

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Craig I. Nishimura, P.E.  
Acting Director and Chief Engineer  
Department of Facility Maintenance  
City and County of Honolulu  
1000 Uluohia Street, Suite 215  
Kapolei, Hawaii 96707

Dear Mr. Nishimura:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 4, 2008 stating that the Department of Facility Maintenance has no comments to offer at this time.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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11999-5

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

KAPOLEI HALE, 1000 ULUOHIA STREET, STE. 309 • KAPOLEI, HAWAII 96707  
Phone: (808) 768-3003 • FAX: 768-3053 • Internet: www.honolulu.gov

MUFI HANNEMANN  
MAYOR



RECEIVED  
2008 JAN 10 PM  
HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY  
LESTER K. ...  
DIRECTOR  
DANA L. TAKAHARA-DIAS  
DEPUTY DIRECTOR

January 4, 2008

Mr. Teney K. Takahashi, Interim Executive Director  
Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813

Dear Mr. Takahashi:

Subject: Supplemental Environmental Impact Statement Preparation  
Notice Revisions to the Kakaako Community Development  
District Mauka Area Plan and Rules ("Mauka Area Plan")  
Kakaako, Oahu, Hawaii

Thank you for the opportunity to review and comment on the Supplemental Environmental Impact Statement for revisions to the Mauka Area Plan.

Section 3.2.6 Open Space, Recreation and Visual Resources states: "In addition to public parks, private developments are required to provide on-site recreational space." If this statement is in reference to the City's Park Dedication Ordinance (PDO), please note that the ordinance permits the Director of the Department of Planning and Permitting to approve on-site private parks and playgrounds in lieu of [not in addition to] land provided in perpetuity or dedicated to the City; payment of fee equal to fair market value of an area of land required to be dedicated or a combination of the above.

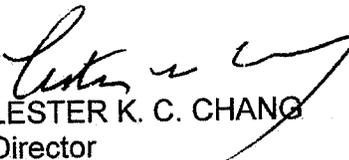
The inclusion of on-site recreational facilities in single and multi-family developments can complement marketing of the units but if the developer meets the Park Dedication Ordinance requirements by dedicating park land off site or payment in fee, there is no requirement that they also include recreational space on site.

Mr. Teney K. Takahashi  
January 4, 2008  
Page 2

We support the representation in Section 4.2.5 that states: "Design guidelines will ensure that development projects integrate with scenic surroundings and incorporate measures to alleviate blocking important views." However, who will decide what is and what is not an **important** view? We recommend that the Draft EIS identify who will be making that determination, what criteria will be used and if appeals are available to those who may disagree with the decisions.

Should you have any questions please contact Mr. John Reid, Planner, at 768-3017.

Sincerely,

  
LESTER K. C. CHANG  
Director

LKCC:mk  
(241908)



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
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Web site  
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Ref. No.: PL EIS 6.26

July 2, 2008

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

Dear Mr. Chang:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

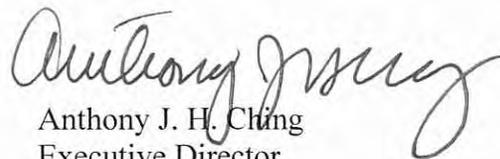
Thank you for your letter of January 4, 2008 offering comments on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice.

The Hawaii Community Development Authority requires each development with 20,000 square feet or more to provide 55 square feet of recreation space per dwelling unit. As a result of this requirement, 17 acres of private recreational space has been developed in the Mauka Area. The intent of this requirement is for private developments to meet the recreational needs of the district through on-site facilities.

The Draft SEIS will include an assessment of important views and critical vantage points from within the Kakaako district.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

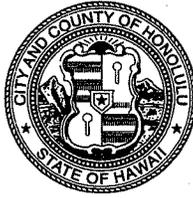
AJHC/ST:lh

c: EDAW, Inc.

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

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813  
TELEPHONE: (808) 768-8000 • FAX: (808) 527-6743  
INTERNET: [www.honolulu.gov](http://www.honolulu.gov) • DEPT. WEB SITE: [www.honoluludpp.org](http://www.honoluludpp.org)



MUFI HANNEMANN  
MAYOR

HENRY ENG, FAICP  
DIRECTOR

DAVID K. TANOUÉ  
DEPUTY DIRECTOR

2007/ELOG-3591(RY)

January 22, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96809

Dear Mr. Butterbaugh:

Subject: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Community Development District Mauka  
Area Plan and Rules, Kakaako, Oahu, Hawaii

We have reviewed the subject Supplemental EIS Preparation Notice and offer the following comments:

1. The Draft Supplemental Environmental Impact Statement (DSEIS) should analyze the current Kakaako Community Development District (KCDD) boundaries to determine whether or not they need to be modified and the reasons for the modification. We note that with respect to the Civic District that no major development has been initiated as a result of the KCDD in this area since 1982 and the continued inclusion of the Civic Center within the KCDD has not been shown to be of significant value in the planning and development of Kakaako since the inception of the plan.

For your information, the City Primary Urban Center Development Plan (PUC DP, June 2004) calls for the establishment of neighborhood plans to provide greater details in guiding future development at the neighborhood level. Revisions to the KCDD Mauka Area Plan and Rules could be viewed as a starting point for the neighborhood's detailed planning effort called for in the PUC DP. As such, we recommend that Section 3.2.2 of the PUC DP relating to neighborhood planning policies be incorporated where appropriate.

2. The City is currently undertaking major planning efforts related to transit and transit-oriented development (TOD). As you may be aware, the City's High-Capacity Transit Corridor project sets forth alternative transit alignments and transit station locations that affect the KCDD in which their siting and future development could serve as a major component of the overall planning

framework for the district. For example, there is a need for discussions about the proposed fixed-guideway route through Kakaako and how transit-oriented development can be achieved around the transit stations.

For your information, two (2) transit stations are planned in the Mauka Area: one is planned on Halekauwila Street between South Street and Keawe (known as the Civic Center Station) and the other is planned at the Ward Gateway Center (known as the Kakaako Station). The DSEIS should also include the identification of street improvements that are needed to enhance the pedestrian experience along routes that access these stations, e.g., Queen Street.

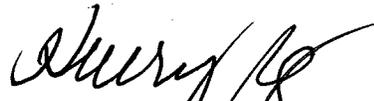
3. With respect to the urban village concept in the Pauahi neighborhood, more discussion is needed on its urban design and integration into the greater community.
4. Kakaako currently lacks a "heart" on which all proposed connectivity networks (i.e., open space, pedestrian pathways, bikeways, etc.) can relate to. It appears that all networks connect to the parks and open spaces outside or on the fringes of Kakaako (i.e., Ala Moana Park, Waterfront Park, Civic Center, and Thomas Square). The network system goes through Kakaako but not necessarily to Kakaako. Moreover, there is a lack of identity for Kakaako. The transit stations and surrounding TOD projects could provide that focus on this important area.
5. Although Kakaako is zoned and regulated by the HCDA, the SEIS should include a section that discusses how the Mauka Area Plan supports the vision, policies, principles, and guidelines contained in the Primary Urban Center Development Plan.
6. The DSEIS should include a map that shows the City and County zoning for the areas adjacent to the Kakaako Mauka Area.
7. The KCDD's Urban Design Principles (Section 2.3.1) should include principles that call for: (1) preserving panoramic views of natural landmarks and the urban skyline; and (2) providing for parks and active recreation areas.
8. Building height portions of the KCDD's Development Provisions (Section 2.3.2) need to be supported with maps that delineate height limits. A viewplane analysis including photographic simulations of the visual impact to panoramic views and to important view corridors should be included in the DSEIS. The critical panoramic views identified in the PUC DP for preservation are specifically from Ala Moana Beach Park toward the Koolau Range, from Kewalo Basin toward the Koolau Range and Punchbowl, and from the Kakaako Waterfront

Park toward Punchbowl and the Koolau Range. Furthermore, significant mauka-makai view corridors should be preserved and enhanced; specifically mauka views from Cooke Street, Ward Avenue, and Piikoi Street (Section 3.1.3.3 of the PUC DP).

9. The KCDD's Development Provisions (Section 2.3.2) states that the minimum height is 40 feet along all street-fronts. The DSEIS should clarify if this includes all streets in the Mauka Area including streets of Sheridan and Central Kakaako neighborhoods which are characterized by small lots.
10. Section 2.5 (Housing) states that the Mauka Area Plan will focus its housing on workforce units, to include prospective buyers whose incomes range from 100 to 140 percent of the Oahu's median income. One of the key vision elements in the PUC DP calls for the PUC to offer in-town housing choices for people of all ages and incomes (Section 2.3 of the PUC DP). The DSEIS should discuss for the provision of affordable housing for lower income groups, i.e., from below 80 percent (80%) of median income which would be beneficial to the elderly, young families, and the primarily service-oriented workforce.
11. We are concerned about the adequacy of recreational space planned. The City's park standard is two (2) acres of park land per 1,000 residents. Based on this ratio and the disclosed population as of 2000, approximately 18 acres of park land is needed, which is twice what is presently provided, according to information in the SEISPN. The DSEIS should discuss anticipated increases in public park space, particularly for active recreational use, using the City's definition of "parks and playgrounds", under Section 22-7.2 of the Revised Ordinances of Honolulu. Please note that open, landscaped areas are not considered park space under this definition. Existing park space should be categorized by type—public parks, privately owned parks open to the public, and private-owned and used parks--and their acreage.

Thank you for the opportunity to comment. Should you have any questions, please contact Raymond Young of our staff at 768-8049.

Very truly yours,



Henry Eng, FAICP, Director  
Department of Planning and Permitting

HE:lh

Doc. 593030

cc: Ms. Susan Tamura, HCDA

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
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Anthony J. H. Ching  
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Web site  
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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Henry Eng, FAICP, Director  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street, 7<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Dear Mr. Eng:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

1. The boundary for the Kakaako Community Development District is established by the State Legislature. Any amendments to the boundary will require legislative action.
2. The Draft SEIS will include a discussion on the proposed High Capacity Transit Corridor project. Proposed station locations established by the City and County are identified in the Transportation section of the Draft SEIS. A primary objective of the Draft Mauka Area Plan is to create a pedestrian-friendly roadway network. The Draft Mauka Area Plan calls for a network of Pedestrian Tolerant and Pedestrian Supportive environments, with landscaped sidewalks and active building frontage that are conducive to pedestrian traffic.
3. The Draft SEIS will include a discussion on neighborhoods, including the Pauahi neighborhood, and its integration with the larger Kakaako District.
4. The three key principles of the Draft Mauka Area Plan include: (1) develop urban village neighborhoods where people can live, work, shop and play; (2) create great public places; and (3) make connections by providing convenient access to a wide range of

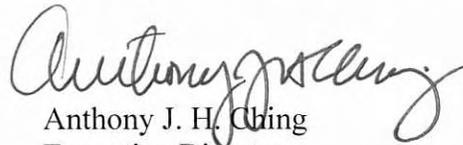
services and activities via walking, bicycling, driving or public transit. It is envisioned that great public spaces such as the Mother Waldron Playground, future pedestrian plazas provided by private developers, as well as future TOD stations could create public gathering places and destinations for Kakaako residents and visitors.

5. The Draft SEIS will include a discussion on how the Mauka Area Plan supports the vision, policies, principles and guidelines contained in the Primary Urban Center Development Plan.
6. The Draft SEIS will include a map that shows the areas adjacent to the Kakaako Mauka Area. The discussion includes information on the contextual relationship between Kakaako and urban Honolulu.
7. Your suggestion that the Urban Design principles include (1) preserving panoramic views of natural landmarks and the urban skyline; and (2) providing for parks and active recreation areas will be taken under advisement.
8. The Draft SEIS will include a view plane analysis including photographic simulations and important view corridors.
9. The Draft SEIS will include a clarification of heights along all street-fronts.
10. The objective of HCDA's Reserved Housing Program is to provide housing for sale or rent to moderate income households, also known as workforce housing, that generally have incomes that are too high to qualify for housing assistance, but are too low to qualify for market housing. Other State agencies, such as the Hawaii Housing Finance & Development Corporation, specialize in affordable housing development and are better qualified in providing housing for the lower income groups.
11. The Draft SEIS will include a discussion of parks, including public, privately-owned parks open to the public and privately-owned and used parks.

Mr. Henry Eng, FAICP  
Department of Planning and Permitting  
July 2, 2008  
Page 3

We appreciate your interest and participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony J. H. Ching". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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12020-16  
ST

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 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

January 17, 2008

RECEIVED  
2008 JAN 22 PM 12 52  
HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

Mr. Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

Subject: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Community Development District  
Mauka Area Plan and Rules

In response to your letter dated December 21, 2007, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet (45 720 mm) from a fire apparatus access road as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)
2. Provide a water supply, approved by the county, capable of supplying required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of the 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the

Mr. Kevin Butterbaugh  
Page 2  
January 17, 2008

exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2, as amended.)

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

Should you have any questions, please call Acting Battalion Chief Jason C. Takara of our Fire Prevention Bureau at 723-7151.

Sincerely,



KENNETH G. SILVA  
Fire Chief

KGS/SY:bh

cc: Susan Tamura, Hawaii Community Development Authority ✓



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

677 Ala Moana Boulevard  
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Facsimile  
(808) 587-8150

E-Mail  
contact@hcdaweb.org

Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

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

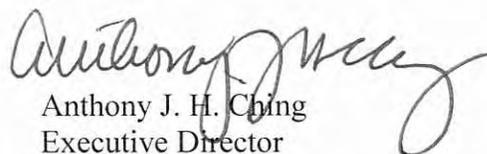
Dear Mr. Silva:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 17, 2008 offering comments on the subject Supplemental Environmental Impact Statement Preparation Notice. As stated in your letter, all projects shall comply with provisions of the Uniform Fire Code. Construction plans will be submitted for review and approval to the Fire Prevention Bureau Plans Examining Section prior to construction.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

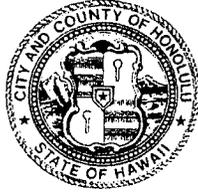
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POLICE DEPARTMENT  
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813  
TELEPHONE: (808) 529-3111 · INTERNET: www.honoluluupd.org

11982

MUF: HANNEMANN  
MAYOR



BOISSE P. CORREA  
CHIEF

PAUL D. PATZELL  
MICHAEL D. TUCKER  
DEPUTY CHIEFS

OUR REFERENCE **BS-KP**

December 27, 2007

RECEIVED  
2008 JUN 2 PM 4 09  
HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

Mr. Kevin Butterbaugh  
EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Dear Mr. Butterbaugh:

This is in response to a letter from the state Hawaii Community Development Authority (HCDA) regarding the Supplemental Environmental Impact Statement Preparation Notice for the Revisions to the Kakaako Community Development District Mauka Area Plan and Rules project.

The Honolulu Police Department supports the plan, particularly the emphasis on creating an outstanding pedestrian environment, providing bicycle facilities, and ensuring public safety features such as well-designed lighting and effective security equipment.

If there are any questions, please call Major Clayton Saito of District 1 at 529-3386 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

cc: ✓ Ms. Susan Tamura, HDCA

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Boisse P. Correa, Chief of Police  
Police Department  
City and County of Honolulu  
801 South Beretania Street  
Honolulu, Hawaii 96813

Dear Chief Correa:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of December 27, 2007 supporting the proposed revisions to the Mauka Area Plan. We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

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## **PUBLIC UTILITIES**

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200 Akamainui Street  
Mililani, Hawaii 96789-3999  
Tel 808-625-2100  
Fax 808-625-5888



January 12, 2008

EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Attn: Mr. Kevin Butterbaugh

**Subject: Supplemental Environmental Impact Statement  
Kakaako Community Development District Mauka Area Plan**

Dear Mr. Butterbaugh,

Thank you for the opportunity to comment on the Kakaako Mauka Area Plan EIS. I would like to make a correction to a statement made on page 3-7 regarding Cable TV. The last sentence should say *OTWC is responsible to service the public demand in accordance with the Department of Commerce and Consumer Affairs (DCCA) regulations*. OTWC is a private business and not a Public Utility so the Public Utility Commission does not oversee our operations in the same way as HECO and Hawaiian Telcom. I have no further comments on the Environmental Impact Statement. Should you have any questions or need anything clarified please contact me at #625-8346.

Sincerely,

A handwritten signature in cursive script that reads "Randy Makizuru".

Randy Makizuru  
OSP Engineer

Cc: Ms. Susan Tamura  
Hawaii Community Development Authority

1930s, much of these piping were replaced under the HCDA's improvement district projects.

### 3.3.4 Power and Utilities

#### Electricity

The primary source of electricity service on the island of Oahu is generated by Hawaiian Electric Company (HECO) power plants. Electricity generated at the power plants is transmitted via high voltage above ground transmission lines to the Kakaako area. Transformers in substations step the high voltage down to usable levels for consumer equipment and appliances. Secondary feeds from the transformers are wired via underground conduits and handholes/vaults to customers.

#### Cable

Oceanic Time Warner Cable (OTWC) provides CATV service to the Mauka Area via coaxial and fiber cables aerial and underground within and around the Mauka Area. The aerial facilities are on joint poles. OTWC is responsible to service the public demand in accordance with State Public Utilities Commission (PUC) regulations.

#### Telephone

Hawaiian Telcom owns and operates the Mauka Areas telephone system. Existing trunklines are routed in underground raceways and overhead lines. Hawaiian Telcom is responsible to service the public demand in accordance with the State PUC regulations.

#### Gas

The primary source of gas for the Honolulu area is The Gas Company. Through a network of distribution lines gas is transmitted throughout the Mauka Area via service laterals. The Gas Company is responsible to service the public demand in accordance with the State PUC regulations.

## 3.4 Socio-Economic Conditions

### 3.4.1 Population

Based on 2000 Census data, Tracts 36, 37, and 38, which make up Kakaako-Ala Moana neighborhood, have a combined population of 8,992 persons. The population change from 1990 to 2000 is relatively substantial considering the County population change is 4.56 percent. Relevant Mauka Area population characteristics are shown in Table 4-1.

The resident population in the Mauka area can be characterized as slightly older than the County as a whole and household size is generally smaller than the County. The tracts are also below the County average of 2.95 persons per household.



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Web site  
www.hcdaweb.org

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Randy Makizuru  
OSP Engineer  
Oceanic Time Warner Cable  
200 Akamainui Street  
Mililani, Hawaii 96789

Dear Mr. Makizuru:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 12, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. As requested in your letter, the Cable section of the Draft SEIS will state that Oceanic Time Warner Cable is responsible to service the public demand in accordance with the Department of Commerce and Consumer Affairs regulations.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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January 22, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813

Re: Comments Regarding Proposed Revisions to Mauka Area Kakaako Community Development District Plan and Rules

Dear Mr. Butterbaugh:

This letter contains our comments regarding the proposed changes outlined in the Draft Mauka Area Plan for the Kakaako Community Development District. CUNA Mutual Investment Corporation is the fee simple owner of the 76,023 square foot parcel located at 600 Kapiolani Boulevard (intersection of Kapiolani Boulevard and King Street), TMK # 210460020000. CUNA Mutual Investment Corporation is a wholly owned subsidiary of the \$15 billion CUNA Mutual Group, the world's leading provider of financial services to credit unions and their members.

While we agree with the general objectives outlined in the plan, we have serious concerns about several of the specific implementation recommendations. We support the mixed-use concept for the Kakaako District where people will be able to live, work, shop and play within a neighborhood community. We recently hired the Jones Lang LaSalle Company to study the financial feasibility of redeveloping our property into a new mixed use project. We forwarded a copy of the Draft Plan to Jones Lang LaSalle and several of the proposed changes would greatly jeopardize the financial feasibility of the mixed use project.

Our concerns regarding the proposed changes include the following:

- We strongly object to the proposed expansion of the Civic Center neighborhood to include our site along with the other properties bounded by Kapiolani, King and Cooke Streets. Our property is part of the Kapiolani Boulevard corridor (our building is known as One Kapiolani) and should not be limited by the restrictions proposed for the Civic Center neighborhood. Per the draft Mauka Area Plan, these restrictions include a building height limit of 65 feet as well as special yard, landscaping and building design guidelines that would greatly limit development of our property. Under the existing Mauka Area Plan and Rules, this height restricted area is defined as being bounded by Punchbowl, King and South Streets, and does not include our property or the other properties on our block. Our property is surrounded by several high rise buildings including one owned by the City of Honolulu and several privately owned mixed use residential towers.
- The proposed reduction in maximum allowable floor plate size for high rise towers from 16,000 square feet to 9,000 square feet significantly reduces building efficiency and has a very negative impact on the financial feasibility of high rise development. Building efficiency is very important, especially in Hawaii due to high construction costs, and if the floor plate is too small, projects will not be economically feasible. Small floor plates negatively impact the number of

units that can be built, the unit layout and design and significantly increases overall construction costs per unit. While the proposed Draft Plan calls for small tower footprints, there are no restrictions on mid-height building footprints. This will create more mass and bulk below 215 feet in height and work against the stated Draft Plan goal of creating "pedestrian scale" building facades. We believe it would be more pedestrian friendly to have a relatively low street front element (65 feet or less) and then step the building back to a reasonably sized tower element.

- The proposed Draft Plan creates a disincentive to construct more than the minimum number of parking stalls required by building and zoning codes. Under the current Mauka Area rules, parking areas do not count against floor area. Under the proposed changes, parking would count against floor area. This rule change will have a significant negative impact on new projects. It is very important to provide adequate parking and storage areas for tenants and condominium residents. The proposed changes create a competitive disadvantage for new projects versus existing projects that were permitted under the current rules and allowed to construct an adequate number of parking spaces to meet market demand.
- The proposed revisions establish a preferred Mauka-Makai orientation for the longer faces of the tower element. This will negatively impact the feasibility of future projects. Tenants and condominium residents are most interested in Makai facing views, especially Diamond Head and Ewa views. Mauka, downtown Honolulu and Makiki views are less desirable.
- Proposed revisions to reserve housing requirements will significantly reduce the viability of new projects and will defeat the purpose of creating more affordable housing in Honolulu. The proposed rule change from the current requirement of 20% of the total number of residential units, to a requirement that 20% of the total floor area devoted to reserve housing units will create a substantial disincentive for building new residential projects. Given the cost to construct the reserve units, the proposed offsets and bonuses do not adequately compensate the developer for the reduced prices generated by the reserve units. Unless a careful balance is struck between providing additional reserve housing units and maintaining the economic viability of a project, very few new housing units will be built. The new rules establish a strong preference for inclusion of the reserved housing units in the same tower that houses the market units. This will drive up the cost of reserve units and increase maintenance fees paid by reserve housing unit owners because they will contribute their share of overall costs of maintaining and operating a more expensive building. Consideration should be given to more creative alternatives such as establishing reserve unit goals for the Kakaako District as a whole rather than requiring each project to have reserve units. This could result in less expensive units and lower on-going maintenance costs. The new rules propose a perpetual equity sharing provision. This provides a significant disincentive for potential buyers. We believe the equity sharing provision should end at the same time as the buy back provision (after 10 years), or shortly thereafter (no longer than 15 years).

While we agree with many of the stated goals of the Draft Plan, we believe that the proposed changes outlined above will not accomplish those goals. The goals will only be accomplished if rules are put in place that encourage well planned development rather than discouraging new development by making it not economically feasible. It is also not clear why a substantial revamping of the Plan and Rules is needed rather than making appropriate adjustments and modifications to what is already in place.

EDAW, Inc.  
January 22, 2008  
Page 3 of 3

Thank you for providing a forum for us to provide you with our input.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel Larson", followed by a horizontal line.

Daniel Larson  
Director  
CUNA Mutual Group  
5910 Mineral Point Road  
Madison, Wisconsin 53705  
(608) 231-8963  
daniel.larson@cunamutual.com

cc: Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
ATTN: Susan Tamura

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Daniel Larson, Director  
CUNA Mutual Group  
5910 Mineral Point Road  
Madison, Wisconsin 53705

Dear Mr. Larson:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

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Thank you for your letter dated January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

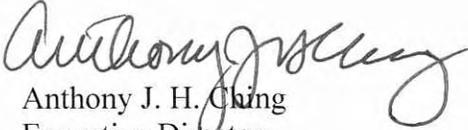
- Your objection to the inclusion of your property (TMK: 2-1-046:002) within the Civic Center neighborhood is noted. The revised Mauka Area Plan proposes the establishment of neighborhoods within Kakaako. The purpose is to create a strong neighborhood identity, to give residents and workers a sense of community and belonging. Further, residents and businesses recognize they have a stake in maintaining the area as a desirable place. The Draft SEIS will include a discussion on neighborhoods and an assessment of its impacts and implications.
- The Draft SEIS will address urban design issues relating to pedestrian environments, maximum road connections, building heights and elements, tower footprint size, orientation and location.
- The Draft SEIS will include parking reduction strategies aimed at creating a more pedestrian friendly and transit-oriented district.
- The need for reserved or work-force housing on Oahu is of major concern to the community. Kakaako presents the means to provide residential opportunities for people of varying incomes, ages and family groups. We agree that finding a balance between providing reserved units and maintaining the economic viability of a project is imperative. The Draft SEIS will assess the proposed reserved housing

Mr. Daniel Larson, Director  
CUNA Mutual Group  
July 2, 2008  
Page 2

program, including proposed requirements, the issue of inclusionary zoning, and equity sharing.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

Hawaii Community Development Authority  
Attn: Ms. Susan Tamura  
677 Ala Moana Blvd., Suite 1001  
Honolulu, HI 96813

January 15, 2008

RE: Revised Mauka Plan EIS and Parking, Setback and Open Space Requirements for Small Lots

Dear Ms. Tamura,

Scattered throughout Kakaako there are numerous small lots. Unfortunately, because of the current plan, should a small property desire to redevelop or change its use, it is unable to. Current parking, setback and open space requirements take up so much of the available space. Any attempt to redevelop the lot makes it impossible to realize a return on what buildable area is left. Consequently, the small lot is not developed. The inability to change or expand its use soon makes a small lot economically difficult to exist. The owner is forced to sell or consolidate. The revised Mauka Plan requires the plan to support small lots. It must provide a way for these lots to evolve and survive.

Suggestions:

1. Minimize the open space and setback requirements and allow parking in these areas.
2. Increase the FAR to parking ratio.
3. Allow the small lots to change their use without increasing parking requirements.
4. HCDA can do a lot by working with the City and County to create a special road design district within Kakaako.
  - a. Allow angle parking fronting small lot properties.
  - b. Allow overhead parking above streets.
5. Require large scale developments to provide public parking that small lots can use.

Thank you. Should there be anything I can help with, please contact me via email [g\\_onishi@msn.com](mailto:g_onishi@msn.com) or phone 927-2704.

Sincerely,

Gary Onishi

Hawaii Community Development Authority  
Attn: Ms. Susan Tamura  
677 Ala Moana Blvd., Suite 1001  
Honolulu, HI 96813

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2008 JAN 9 AM 9 46  
HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

January 5, 2008

RE: Revised Mauka Plan EIS, Industrial properties and Reserved Housing Requirements

Dear Ms. Tamura,

The current Mauka Plan allows for reserved housing for planned developments to be built offsite. Developers have found it economically feasible to pay above market prices for industrial properties to build the required reserved housing. They offset the additional cost by applying it back to the market rate condo project. However, this practice has adverse effects on industrial properties that desire to operate in Kakaako.

Such adverse effects are:

1. Increased parking competition in an already tight environment.
2. City and County real property taxes increase when the city evaluates comparable sales in the area. For an industrial property, this is not an accurate reflection of the property's value. It does not realistically represent the value of the property if it was sold to another industrial user. The increase in property tax added to the cost of business drives industrial businesses out of Kakaako.

HCDA is violating its legislative purpose to preserve industrial use in Kakaako. HCDA is also breaking state law Chapter 206E, HRS paragraph (c), which states "the legislature authorized the empowered Hawaii Community Development Authority (HCDA) to develop a community development plan for the district of Kakaako. It noted the plan for Kakaako should include a mix-used district whereby industrial, commercial, residential and public uses may coexist compatibly in a vertical as well as horizontal mixture within a single development lot. The legislature further directed that in a planning for such mixed uses, the Authority shall also respect and support the function of Kakaako as a major center providing significant employment in such areas as light industrial, wholesaling, service and commercial activities." This violation may open HCDA to potential lawsuits.

Thank you. Should there be anything I can help with, please contact me via email [g\\_onishi@msn.com](mailto:g_onishi@msn.com) or phone 927-2704.

Sincerely,  
Gary Onishi

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2008 JAN 9 AM 9 46  
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DEVELOPMENT  
AUTHORITY

Hawaii Community Development Authority  
Attn: Ms. Susan Tamura  
677 Ala Moana Blvd., Suite 1001  
Honolulu, HI 96813

January 5, 2008

RE: Revised Mauka Plan EIS and Assessment Calculations on Small properties

Dear Ms. Tamura,

In the past, Improvement District (ID) projects in Kakaako have been large in scale. The infrastructure as part of the ID is necessary to introduce the necessary development of large scale condominium and retail developments. The added capacity of the new infrastructure, however, does nothing for small property owners. Yet, small property owners are mandated to share in its cost with out any consideration of its benefit or ability to pay for the cost.

The new Mauka Plan requires support for small property preservation. A close look at how future IDs are funded must be addressed.

Considerations to address:

1. The actual benefit an ID will provide for a small property.
2. The ability for a small property to pay for the proposed infrastructure.
3. The lease tenure of the small property.
  - a. Markettrends Pacific study of Kakaako revealed 70% of Kakaako residents are leasehold property owners. Most net leases require lessees to pay for assessment cost. ID projects are capital improvement projects that do not benefit lease holders and unfairly penalizes lessees.

Thank you. Should there be anything I can help with, please contact me via email [g\\_onishi@msn.com](mailto:g_onishi@msn.com) or phone 927-2704.

Sincerely,

Gary Onishi

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DEVELOPMENT AUTHORITY



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Web site  
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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Gary Onishi  
1446 Ala Napunani  
Honolulu, Hawaii 96818

Dear Mr. Onishi:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your two e-mail messages dated January 5, 2008 and subsequent e-mail message on January 15, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

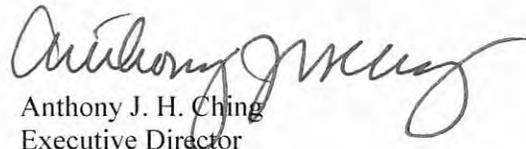
The funding of Improvement District ("ID") projects is established through the administrative rules process pursuant to Chapter 91, Administrative Procedure, Hawaii Revised Statutes. Administrative rules are established for each ID. Issues such as the method of assessment are determined through the rule making process. Your suggestion of changing the funding methodology for ID assessments are noted, as HCDA is currently reviewing the mechanism for funding future IDs.

The Draft SEIS will include an assessment of proposed amendments to the existing Reserved Housing ("RH") Program. While providing RH units off-site is proposed as an option, the preference is for developers to provide the units on-site. Incentives for inclusionary zoning are being considered under the proposed RH Program.

The revised Mauka Area Plan supports and acknowledges small lots within the Kakaako District. As such, the revised Mauka Area Rules will address the sustainability of small lot development by proposing reducing open space and setback requirements, increasing floor area ratio, reduced parking requirements and developing a district-wide parking program aimed at encouraging landowners to develop their lots.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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General Growth Properties, Inc.

January 22, 2008

Mr. Kevin Butterbaugh  
EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, HI 96813

Re: Supplemental Environmental Impact Statement Preparation Notice – Revisions to the Kaka`ako Community Development District Mauka Area Plan and Rules (“Mauka Area Plan”) – Kaka`ako, O`ahu, Hawai`i

Dear Mr. Butterbaugh:

Thank you for the opportunity to comment on the Supplemental Environmental Impact Statement (“SEIS”) Preparation Notice for the Kaka`ako Mauka Area Plan.

General Growth Properties (“GGP”) supports the Hawai`i Community Development Authority’s vision for Kaka`ako of creating a vibrant community where people can live, work, shop and play in close proximity. We are also in alignment with the three key principles being introduced for the proposed update of the Mauka Area Plan: (1) develop urban village neighborhoods; (2) create great public spaces; and (3) establish connections by providing convenient access to a wide range of services and activities. As we develop a master plan for our Ward properties, we are incorporating these principles as essential elements of our vision.

We offer the following suggested changes to the SEIS Preparation Notice and the proposed revisions to the Mauka Area Plan. Please note that all section references are to the SEIS Preparation Notice document.

i. General Comment

- Please note that, although the document indicates that GGP owns 66 acres of property throughout Kaka`ako, the area owned is approximately 60 acres.

ii. Section 2.1 (Land Use Plan)

- We support the designation of a single Mixed Use Zone designation for the majority of the properties in Kaka`ako, in place of the Mixed-Use Residential Emphasis (MUZ-R) and Mixed-Use Commercial Emphasis (MUZ-C) Zone designations in the current Mauka Area Plan.
- With respect to Figure 2-1, please note that GGP owns a number of roads on the Ewa side of Ward Avenue. To reflect the private ownership of these roads, we suggest that the area covered by these roads be colored in yellow.

iii. Section 2.3 (Urban Design)

- In Section 2.3.1, two of the principles being proposed are to: (1) create an outstanding pedestrian environment; and (2) provide for maximum road connections. Please note that it is often difficult to achieve these principles concurrently.

Mr. Kevin Butterbaugh  
EDAW, Inc.  
Page 2

- Section 2.3.2 proposes limitations on building heights for towers along Ala Moana Boulevard. We believe that these restrictions will unnecessarily compromise the ability to develop the properties. Through careful design and building orientation, it is possible to preserve Mauka/Makai view corridors without restricting allowable building height.
- Section 2.3.2 also proposes a 9,000 square foot floor plate restriction. We believe that this reduction in floor plate will result in a less efficient building design, increasing per square foot construction costs and subsequently raising the overall cost of housing in the area. The existing limit of 16,000 square feet allows for more efficient construction.
- Section 2.3.2 also increases the maximum height of the street front element to 65'. We support this increased maximum along Ala Moana Boulevard and request that 75' be considered for other areas as a more flexible maximum height to accommodate a variety of mixed uses facing the street.

iv. Section 2.4 (Transportation)

- In Section 2.4, it is proposed that parking in excess of off-street parking requirements be counted as floor area. We recommend that parking reduction strategies that include public transportation and other options be incorporated before adopting such changes.
- Figure 2-4 proposes the location of future streets. While we acknowledge the merit of breaking down superblocks with the introduction of additional roads, we propose that the property landowner be allowed to offer alternatives as to where these streets are to be located for more optimum development.

v. Section 3.1 (Natural Environment)

- With respect to Section 3.1.4, please note that a significant part of Kaka`ako is located in the FEMA FIRM flood plain. Developments in this part of the district could require finish floor elevations above adjacent existing roadway grades, and the street section design for this area may require special design considerations.
- Section 3.1.4 indicates that Zone 2A is based on the Uniform Building Code. This should be updated to reflect the City's adoption of the International Building Code.

vi. Section 3.3 (Infrastructure and Utilities)

- In Section 3.3.2, the sewer condition on Kamake`e Street should be discussed. Please note that, due to the as-built reverse slope sewer condition, developments in the area cannot utilize the improvements as intended.
- In Section 3.3.4, the statement "Secondary feeds from the transformers are wired via underground conduits and handholes/vaults to customers." may need updating. To our knowledge, much of the distribution is overhead.

Mr. Kevin Butterbaugh  
EDAW, Inc.  
Page 3

- vii. Section 4.3 (Infrastructure and Utilities)
  - In Section 4.3.1, please note that adherence to the City's "Rules Relating to Storm Drainage Standards," would also be required, including those relating to Storm Water Quality.
- viii. Section 6 (Parties to be Consulted for Preparation of the Draft SEIS)
  - The Federal agency United States Army Garrison Hawai'i DOIM 30th SIG BN should be added to the list of public agencies, as it operates a trunking system cable route through the Kaka'ako area.
  - The Gas Company and Pacific LightNet should also be added to the list of public utilities as they both have lines through the area.

We appreciate the opportunity to offer comments on the SEIS Preparation Notice. Should you have any questions, please feel free to call me at 947-3788 extension 206.

Sincerely,  
General Growth Properties, Inc.



Jan Yokota  
Vice President, Development  
Hawai'i Region

c: Mr. Anthony Ching, Executive Director  
Hawai'i Community Development Authority

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
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Ref. No.: PL EIS 6.26

July 2, 2008

Ms. Jan Yokota  
Vice President, Development  
Hawaii Region  
General Growth Properties, Inc.  
1441 Kapiolani Boulevard, Suite 202  
Honolulu, Hawaii 96814

Dear Ms. Yokota:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

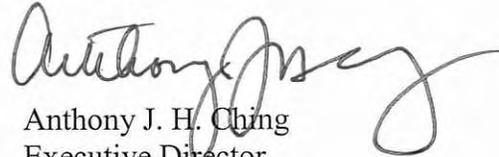
- As requested, the Draft SEIS will state that General Growth Properties, Inc. owns approximately 60 acres of land.
- Land Use. Figure 2-1, Land Use Plan, is intended to delineate land use, not landownership. As such, zoning designations will not be shown on planned and existing roadways.
- Urban Design. The Draft SEIS will address urban design issues relating to pedestrian environments, maximum road connections, building heights and elements, and tower footprint size and location.
- Transportation. The Draft SEIS will address parking reduction strategies aimed at creating a more pedestrian friendly and transit-oriented district. It is the intent of the Hawaii Community Development Authority ("HCDA") to work with landowners to consider alternatives on the future roadways within the Mauka Area.
- Natural Environment. We acknowledge that developments within the FEMA FIRM flood plain may require special design considerations. Reference to the Uniform Building Code will be replaced with the International Building Code.

Ms. Jan Yokota  
General Growth Properties, Inc.  
July 2, 2008  
Page 2

- Infrastructure and Utilities. The HCDA is preparing an infrastructure master plan for the Mauka Area. The proposed upgrades to the District's infrastructure will be disclosed in the Draft SEIS.
- Parties to be Consulted for Preparation of Draft SEIS: The United States Army Garrison Hawaii DOIM 30<sup>th</sup> SIG BN, The Gas Company, and Pacific LightNet will included to the list of parties to be consulted.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

# Kaka'ako Business and Landowners Association

P.O.BOX 898

Honolulu, HI 96808

Tel: (808) 597-1102 Fax: (808) 591-6634

---

EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attn: Kevin Butterbaugh

January 10, 2008

Dear Mr. Butterbaugh,

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kaka'ako Community Development District Mauka Area  
Plan and Rules

As pointed out in the section 1.3 of the EISPN, what HCDA does is based on Chapter 206E, HRS. But the current Mauka Plan and the draft of the revised Mauka Plan do not address the need for planning of industrial uses as stated in sections of Chapter 206E.

“§206E-1 ... The legislature further finds that there exists within the State vast, unmet community development needs. These include, but are not limited to, a lack of suitable affordable housing; insufficient commercial and industrial facilities for rent...”

“§206E-33 ... (1) Development shall result in a community which permits an appropriate land mixture of residential, commercial, industrial, and other uses. ... (2) Existing and future industrial uses shall be permitted and encouraged in appropriate locations within the district. No plan or implementation strategy shall prevent continued activity or redevelopment of industrial and commercial uses which meet reasonable performance standards...”

In the EISPN section 2.3 Urban Design, one of guiding principles is stated to be to support the small lot developments. The challenge in Central Kaka'ako is not just the many small lots, but also, the many small service, wholesale, and light industrial businesses that exist. Some of the issues have been addressed in HCDA's "Small Business Task Force – Findings and Recommendations" report.

When reading through the draft of the revised Mauka Plan and the EISPN, the theme is development of residential and commercial use and a heavy emphasis on pedestrian friendly streets. There is no recognition of the existing community of service and light industrial businesses. There is no thought that in some areas maybe revitalization may be more appropriate than redevelopment. In these areas, pedestrian safe streets maybe more appropriate than pedestrian friendly streets.

In 2006, Kaka'ako Mauka businesses have employed more than 16,000 people (2006 Hawaii Date Book) and have contributed more than \$2 billion in sales. Many of these businesses have been in Kaka'ako for more than 15 years and attribute the success of their businesses to their location. If the Mauka Plan does not do more in terms permitting and encouraging "... existing and future industrial uses..." (§206E-33), Kaka'ako Mauka's contribution to Honolulu's economy will erode.

Sincerely,

A handwritten signature in black ink, appearing to read "Dexter Okada", with a long horizontal flourish extending to the right.

Dexter Okada

c: Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
Attn: Susan Tamura



HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Dexter Okada  
Kakaako Business and Landowners Association  
P.O. Box 898  
Honolulu, Hawaii 96808

Dear Mr. Okada:

Re: Revisions to the Kakaako Mauka Area Plan and Rules  
Supplemental Environmental Impact Statement Preparation Notice  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 10, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

The Hawaii Community Development Authority ("HCDA") acknowledges the important social and economic value of the existing service and light industrial businesses in the Kakaako District. Majority of the service and light industrial businesses are located in the Central Kakaako area of the Mauka Area. Within the past two years, the HCDA has studied various options that would support existing service and light industrial businesses in the Central Kakaako area, including re-evaluating the assessment method for Improvement District projects, reducing open space and setback requirements, increasing floor area ratio, reducing parking requirements, and develop district-wide parking program. Please be assured that the HCDA will continue to work toward maintaining the existing service and light industrial businesses in the District.

We appreciate your interest and participation in the environmental review process.

Sincerely,

Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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# Waterhouse, Inc.

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HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

January 22, 2008

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Blvd., Suite 1001  
Honolulu, Hawaii 96813

RE: Comments on the Draft Kaka'ako Mauka Plan ("Plan")

Dear Ms. Tamura:

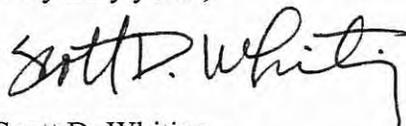
I am writing this letter on behalf of Waterhouse, Inc., owner of five parcels of land located within the Plan area. These parcels are as listed below:

670 Queen Street	TMK: 1-2-1-048-006
716 Cooke Street	TMK: 1-2-1-048-002
711 Kawaiahao Street	TMK: 1-2-1-040-007
700 Queen Street	TMK: 1-2-1-048-005
768 Kapiolani Blvd.	TMK: 1-2-1-044-022

We object to changes proposed in the Plan. Specifically, we object to the proposed reduction in the size of the footprint of any tower within the Mauka Area from the current 16,000 square feet to the proposed 9,000 square feet. It is our opinion that this proposed change will result in a disincentive to develop and will force developers into one product category—that, being luxury condominiums. There will be no way for developers to recuperate their investment on such a small footprint without seeking the highest possible return on a smaller, more slender tower. This reality combined with any affordable housing requirement imposed on the developer will make development of such towers uneconomic.

It appears that the intent of this proposed change is to preserve view corridors. May we suggest that the HCDA seek other, more economic site planning alternatives to protect view planes rather than this uneconomic "slender" tower approach.

Very truly yours,



Scott D. Whiting  
President

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Scott D. Whiting, President  
Waterhouse, Inc.  
670 Queen Street, Suite 200  
Honolulu, Hawaii 96813

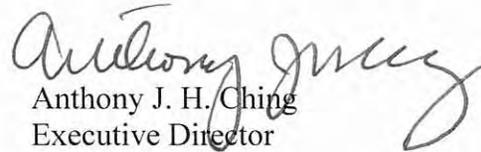
Dear Mr. Whiting:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 stating your objections to the changes proposed in the Revised Mauka Area Plan. The Draft SEIS will assess the proposed changes to the urban design provisions, including tower footprint and view corridors.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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## KAMEHAMEHA SCHOOLS

1/22/2008

EDAW, Inc.  
541 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
Attn: Kevin Butterbaugh

Dear Mr. Butterbaugh:

**Re: Supplemental Environmental Impact Statement Preparation Notice  
Revision to the Kaka'ako Community Development District Mauka Area Plan and Rules ("Mauka Area  
Plan") – Kaka'ako, Oahu, Hawaii**

Kamehameha Schools respectfully submits the attached response to the Supplemental Environment Impact Statement (SEIS) for the proposed revisions to the Kaka'ako Community Development District Mauka Area Plan and Rules.

We have a significant vested interest in the redevelopment of Kaka'ako and have committed substantial time and resources in preparing our own strategic implementation plan for our 53 acres of land in Kaka'ako, especially the 41 plus acres that are situated in the Mauka Development District. We have completed an updated market assessment for Kaka'ako and are currently in the midst of a planning exercise that provides the best development scenario that is supported by prescribed land uses in the market study area. Any proposed revisions will have an impact to the work that we are doing and to that end we are requesting your consideration of the points of analyses and recommendations put forth in this response.

We feel that in addition to taking this response as part of the formal response to the SEIS, an opportunity to present and explain our findings with you and appropriate representatives of the Hawaii Community Development Authority will provide ample time to fully elaborate on our findings and observations to the proposed rule changes.

It is our firm belief that through an open and collaborative discussion of issues raised for the proposed rule changes that we will be able to achieve the desired goal of crafting revisions to the Mauka Rules that not only support good urban planning principles but also stimulate the development of sustainable projects that will in the end achieve the "Live, Work, and Play" objectives of the HCDA.

We look forward to working with you on this significant undertaking.

Very truly yours,

Mike Dang  
Director of Planning & Development

Cc: Susan Tamura



# MAUKA AREA PLAN

Kakaako Community  
Development District  
Honolulu, Hawaii

**\*\*\*NOTE: THIS IS AN ANNOTATED  
VERSION OF THE PROPOSED DRAFT  
MAUKA AREA PLAN ("MAP"). IT  
REFLECTS COMMENTS, QUESTIONS, AND  
IDEAS FROM THE COMMENTATORS FROM  
THE PLANNING & DEVELOPMENT DIVISION  
OF THE KAMEHAMEHA SCHOOLS.\*\*\***

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Notes:

Overall, we are pleased in general with the aspirations of this approach. We greatly appreciate the HCDA for seeking comments and input from stakeholders and others. We appreciate EDAW's work on this project, also.

We are concerned with some parts of the proposals which would seem to reduce the desirability of re-developing Kaka'ako at this time but we hope that this process can address those concerns.

Please note that this document is in a track changes format so you can see where changes are recommended or requests are being made, in context of the MAP. Another copy is provided in a non track change format for you, also.

Please ensure that provisions for grandfathered rights are included in either the MAP or MAR(ules). We have discussed a variety of impacts here or changes that may have impacts which should be considered.

We encourage the fleshing out of this document to clarify the direction and thoroughness of thought on the impacts of these proposals from all critical perspectives. This would include an increase in tables of information, more pictures of analogous in place examples, and citations to references informing the MAP.

We invite EDAW and/or the HCDA to contact us at any time to discuss the notes we've added here or any other aspects of this process. As landowners in the area, and given our historical tie to this area, we are passionate about seeing the area grow to contribute to the beauty and vitality of Kaka'ako.

We believe that a well designed MAP will minimize—environmental impacts of development within Kakaako— if not reduce impacts, such as traffic, in other parts of the island. In this way, good planning and development will contribute to the quality of life here.

Mike Dang  
Director of Planning and Development  
The Kamehameha Schools

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## 1.0 Introduction

The Hawaii Community Development Authority's vision is to ensure that the Kakaako Community Development District becomes the most sustainable, livable urban community in the State, a place where people can work, live, visit, learn and play. The intent is to establish a community that offers people choices – a range of housing opportunities with parks, recreation areas, shopping and work places, and commuting options that will make life more comfortable and convenient. The Kakaako Community Development District's Mauka Area Plan and Rules (Mauka Plan and Rules) sets forth policies and direction for both public improvements and private development within the Mauka Area over the next 10 to 20 years.

[Are you able to include background such as the definition of Kaka'ako and whether it is Kaka'ako or Ka'ka'ako?](#)

**Purpose and Legislative Intent.** In 1976, the State Legislature created the Hawaii Community Development Authority (HCDA) to plan for and revitalize areas in the State which lawmakers find to be in need of timely redevelopment. With the enactment of Chapter 206E, Hawaii Revised Statutes (HRS), the State Legislature empowered the HCDA with comprehensive planning, regulation, and development responsibilities. The State Legislature named Kakaako as HCDA's first Community Development District, recognizing its potential for increased growth and development. The original Kakaako Community Development District encompassed approximately 450 acres and is bounded by Piikoi Street, Ala Moana Boulevard, Punchbowl Street and King Street; hereinafter referred to as the "Mauka Area". Subsequent to approval of the original Kakaako Community Development District Mauka Plan and Rules, the Legislature expanded the district to include the 220-acre area bounded by Ala Moana Boulevard, Ala Moana Regional Park and Honolulu Harbor. In 1983, the HCDA adopted a separate Makai Area Plan.

The Mauka Area is prominently located in the center of urban Honolulu, lying strategically between the downtown area, the densely populated Makiki district, Ala Moana and Honolulu Harbor. Despite its prime location and its economic importance to the State of Hawaii, Kakaako remains relatively underdeveloped, with aging streets, utility systems and buildings.

Development guidance policies were established by the State Legislature to govern the HCDA's planning and development activities for the Mauka Area. These policies are found in Section 206E-33, HRS and express the following:

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1. Development shall result in a community which permits an appropriate land mixture of residential, commercial, industrial, and other uses. In view of the innovative nature of the mixed use approach, urban design policies should be established to provide guidelines for the public and private sectors in the proper development of this district; while the authority's development responsibilities apply only to the area within the district, the authority may engage in any studies or coordinative activities permitted in this chapter which affect areas lying outside the district, where the authority in its discretion decides that those activities are necessary to implement the intent of this chapter. The studies or coordinative activities shall be limited to facility systems, resident and industrial relocation, and other activities with the counties and appropriate state agencies. The authority may engage in construction activities outside of the district; provided that such construction relates to infrastructure development or residential or business relocation activities; provided further, notwithstanding section 206E-7, that such construction shall comply with the general plan, development plan, ordinances, and rules of the county in which the district is located;
2. Existing and future industrial uses shall be permitted and encouraged in appropriate locations within the district. No plan or implementation strategy shall prevent continued activity or redevelopment of industrial and commercial uses which meet reasonable performance standards;

3. Activities shall be located so as to provide primary reliance on public transportation and pedestrian facilities for internal circulation within the district or designated subareas;
4. Major view planes, view corridors, and other environmental elements such as natural light and prevailing winds, shall be preserved through necessary regulation and design review;
5. Redevelopment of the district shall be compatible with plans and special districts established for the Hawaii Capital District, and other areas surrounding the Kakaako district;
6. Historic sites and culturally significant facilities, settings, or locations shall be preserved;
7. Land use activities within the district, where compatible, shall to the greatest possible extent be mixed horizontally, that is, within blocks or other land areas, and vertically, as integral units of multi-purpose structures;
8. Residential development may require a mixture of densities, building types, and configurations in accordance with appropriate urban design guidelines; integration both vertically and horizontally of residents of varying incomes, ages, and family groups; and an increased supply of housing for residents of low- or moderate-income may be required as a condition of redevelopment in residential use. Residential development shall provide necessary community facilities, such as open space, parks, community meeting places, child care centers, and other services, within and adjacent to residential development;
9. Public facilities within the district shall be planned, located, and developed so as to support the redevelopment policies for the district established by this chapter and plans and rules adopted pursuant to it.

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These policies established the State Legislature's intent as to how the future development of Kakaako can best serve the needs of Hawaii's residents and visitors.

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### 1.1 Project Background

Pursuant to Chapter 206E, HRS, the HCDA embarked upon a comprehensive planning program that began in 1977 and involved an inventory of assets in Kakaako, evaluation of capacity and constraints, the development of alternatives, and the finalization of a plan through a public process. The Mauka Plan and Rules were adopted in 1982. The original planning vision for the Mauka Area proposed a mixed-use community, with a focus on large lot development through land consolidation. The projects envisioned by the Mauka Plan and Rules were tall towers on 45-foot podiums. The intent of the 45-foot podium was to provide space for parking and ground floor commercial or industrial use. In addition, an elevated pedestrianway was proposed that would link podiums from one block to another. Parks would be built atop the 45-foot platform.

Since inception of the Mauka Plan and Rules in 1982, the Mauka Area has been gradually changing from an industrial/commercial service district to an area of higher density projects with commercial and residential uses. To date, over \$203 million has been invested in improvement district projects to upgrade the infrastructure and roadways in Kakaako. In response, the private sector has developed over \$2 billion in projects which included the construction of 2,089 housing units. In addition, there have been 1,451 affordable and reserved housing units built. Development of park land has also been a priority for the HCDA, with 45 acres of new park land developed within the Kakaako district.

In 2005, HCDA, along with project consultants PlanPacific, Inc. embarked on a comprehensive review and revision of the Mauka Plan and Rules in response to longstanding issues relating to the Mauka Area Plan's urban design scheme and concern regarding the cohesiveness and livability of Kakaako's neighborhoods. Project objectives for the proposed revision include the following:

- Develop the Plan around key Smart Growth concepts including:
  - Pedestrian-friendly urban form, including structures built at human scale and defined public spaces.
  - Neighborhoods defined by centers, edges and a mix of uses.
  - Streets designed to accommodate multiple modes of transportation and to balance the need for access.

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circulation and mobility.

– Street patterns that create a network and alternate travel routes throughout the District.

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– Civic buildings (meeting halls, community facilities, churches, schools, and museums) are located on prominent sites within neighborhood centers.

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• Promote mixed-use neighborhoods, recognizing that every project need not be mixed-use.

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• Strengthen connection with surrounding neighborhoods and districts.

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• Define and establish specific objectives for neighborhoods, corridors and streets.

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• Building on existing assets and planned investments, such as Mother Waldron Park, street and utility improvements and the proposed high capacity transit line.

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• Encourage a mix of housing opportunities including reserved housing and affordable units.

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\* Balance such considerations with practicable development guidelines that act as incentives to developing the area rather than disincentives, encouraging no revitalization at this time.

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Through an extensive stakeholder and public input process, a revised Mauka Plan and Rules was developed that fulfills the objectives of 206E, HRS in planning for a high-quality urban community that also promotes positive economic development, preserves Honolulu’s diverse cultural heritage, and incorporates best practices in energy and environmental sustainability.

## 2.0 Context

### 2.1 Surrounding Districts

Honolulu’s surrounding urban districts and activity centers have a distinct character and direct influence on potential future development and the urban form in the Mauka Area. The following is a description of the areas surrounding the Kakaako District.

Honolulu’s **Central Business District** – the major financial center of the Islands – lies within a mile of Mauka Area.

**Chinatown**, a historic district on the edge of downtown, has seen a resurgence of investment in building restoration, infill development and economic and cultural activity in recent decades. Chinatown offers successful examples of the “urban village” concept, and shows how small lots can be an integral part of neighborhood revitalization.

In recent years, **Honolulu Harbor** has been attracting greater numbers of people to the waterfront with the development of Aloha Tower Marketplace and the increasing numbers of cruise ships that dock here.

The **Civic Center** houses the State Capitol, Honolulu Hale, many of the state and city agencies, and most of the federal agencies in Hawaii. It also contains many of Hawaii’s most significant historic buildings, including Iolani Palace and Kawaiahao Church. Civic Center buildings are situated in a beautifully landscaped campus with shaded sidewalks and interior pathways that invite walking, informal recreation and occasional public events.

The **Cultural District** is centered on Thomas Square, Honolulu’s first park, which is the focal point for a cluster of cultural institutions, including the Honolulu Academy of Arts and the Neal S. Blaisdell Center (NBC).

**Ala Moana Shopping Center**, which sits on the Waikiki side of the Mauka Area, is Hawaii’s largest retail center. In the past couple of decades, a cluster of entertainment and retail uses, known as Ward Centers, has emerged in close proximity to Ala Moana Shopping Center. In April 2002, the owner of Ala Moana Shopping Center acquired Ward Centers and other Ward Estate properties.

**Ala Moana Regional Park**, and **Kakaako Waterfront Park**. Two of Honolulu’s largest shoreline parks, are adjoining and located directly makai of Mauka Area, across Ala Moana Boulevard. Ala Moana Regional Park’s beaches and varied outdoor recreation facilities draw a large numbers of users. Kakaako Waterfront Park is becoming an increasingly popular destination, and is expected to get greater use as the number of residents in Mauka Area grows.

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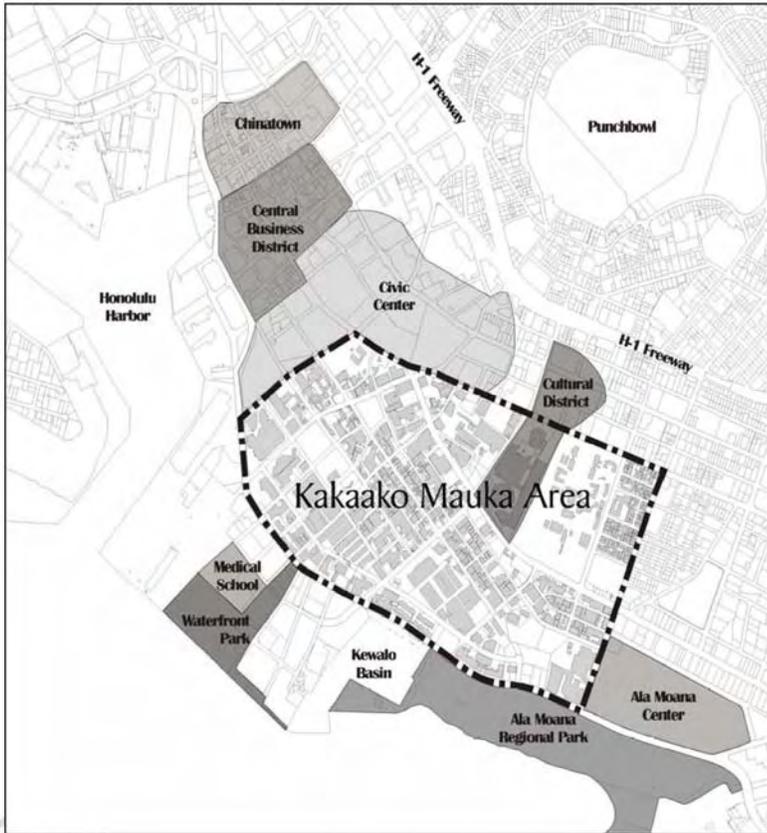
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\* Please include a table showing the acreage inventory of all of these parks.  
 \* Please include Ala Moana Park in the measuring of park availability—despite the latest lines drawing it out.  
 For practical purposes, the current and coming residents do and will consider it another of the desirable amenities for being in the District. This idea of recognizing that Ala Moana Park will be considered by the residents and visitors to the area as a part of the area would be consistent with how residents and visitors seem to include such beachfront parks in such beach cities as Santa Monica, Venice, Playa Vista, Marina del Rey, San Diego, La Jolla, Newport Beach, and parts of Honolulu.

At present, activity at **Kewalo Basin** is centered on dinner and sight-seeing cruises and some small fishing vessels. Kewalo Peninsula is an entry point for popular surfing and fishing spots.

The University of Hawaii’s John A. Burns **School of Medicine**, a recent addition to the Makai Area, is expected to be a catalyst for life sciences research. Various public and private research entities have also expressed interest in locating in this vicinity.



## 2.2 Land Holdings

The size of land parcels and concentrations of land ownership has had strong influence on the redevelopment of the Mauka Area. Land ownership in the district is diverse with both private and public-owned lands. The State of Hawaii and City and County of Honolulu owns approximately 90 acres of land in government buildings, schools, cultural facilities and parks. Utility companies comprise approximately 14 acres of land. Private ownership comprises 346 acres of land in the Mauka Area. Two major landowners, Kamehameha Schools (KS)

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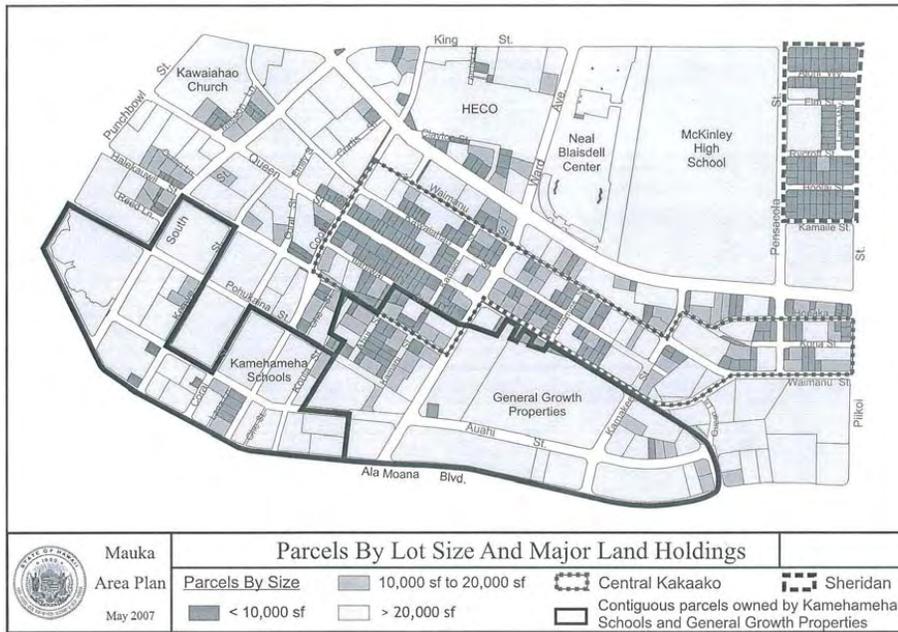
and General Growth Properties, Inc. (GGP), own large tracts of land within the district.

Kamehameha Schools owns 51 acres in Kakaako, including four blocks in the Makai Area. In 2004, KS prepared a strategic plan for its Kakaako lands. The strategic plan focused on creating value for the KS trust; the plan calls for two key initiatives: (1) developing life sciences facilities in the Makai Area; and (2) developing a mixed-use “urban village” in the Mauka Area that would be primarily residential, augmented by retail stores, live-work spaces, and offices. The plan presents an urban design framework” that has many aspects in common with the Smart Growth principles espoused in this Plan.

Acquired in 2004, GGP owns and manages approximately 66 acres in the Mauka Area, identified as Ward Estate lands. Retail development within the Mauka Area has been led by Victoria Ward Ltd, former landowner of Ward Estate lands. The Ward Centers retail complex includes a 16-screen theater complex, retail use as well as a residential and a grocery store currently under construction. Additional GGP landholdings lay Ewa of Ward Avenue. These lands are generally leased as small lots to small businesses. In the long-term, VWL envisions redevelopment of the Ewa properties to mixed residential and commercial use.

Equally important to the future of Kakaako are the small parcels of land owned by individual landowners. Small lots are considered to less than 20,000 square feet in size. Small lots are concentrated in two areas of the Mauka Area. The Central Kakaako area of district contains approximately 200 small lots and is occupied by predominantly service businesses. Streets within Central Kakaako are generally unimproved and lack storm drains, and other utilities. Regardless of the physical limitation, Central Kakaako property owners and business owners would prefer to stay in Kakaako. Small businesses can be big earners, and many Kakaako businesses would find it difficult and/or unprofitable to relocate.

The Sheridan Tract area is bordered by Pensacola, King and Piikoi Streets and is comprised of approximately 90 small properties. In the Sheridan Tract area, small lots are generally single and multi family residential units.



### 2.3 Projected Growth

As redevelopment progresses in Kakaako, the district is expected to gain more residents,

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housing units, and jobs. The chart compares 2000 Census figures with a 2030 projection prepared by the Department of Planning and Permitting (DPP). DPP prepares projections for Oahu, using county-level projections from the State Department of Business, Economic Development and Tourism. DPP's projections are used for both land use planning and City and State transportation planning.

Over the 30-year period, population and housing units are projected to increase by about 400 percent. The population is projected to rise from just over 6,000 to over 30,000 in 2030. Housing units are expected to increase above 20,000 from the 4,200 recorded in 2000. Jobs are also expected to increase, although at a much slower rate of 38 percent over the 30-year period, going from 25,600 to 35,300.

\* Please update these forecasts with current data and projects. Please also discuss the potential or at least most likely demographics of coming residents and visitors to the area. This is important because such characteristics should be taken into account for good planning to best accommodate those people and others.

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Although these are large increases, particularly in population and housing, they are consistent with the original Mauka Area Plan. The 1982 Plan projected that at full build-out, the Mauka Area would have a population of 47,500.

### 3.0 Mauka Plan Principles:

#### 3.1 Develop Urban Village Neighborhoods

A key objective of the Mauka Area Plan is to encourage the development of "urban village" neighborhoods. An urban village is where people can live, work, shop and recreate within their neighborhood. It is a self-sustainable and environmentally sensitive neighborhood that promotes community development and cohesiveness. Energy efficiency and the use of renewable resources will be encouraged in all development projects toward the goal of creating sustainable neighborhoods.

\* encourage balancing between things like energy efficient building siting/placement and mauka makai view corridors and their shadow casting properties.

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Urban villages consist of a mix of land uses with a strong residential foundation. Residential developments shall ensure a mixture of densities, heights and building types that will accommodate residents of varying incomes, ages and families. Business establishments and services are accessible by walking, which reduces dependence on automobiles. Neighborhoods shall include necessary public facilities including community meeting places, child care centers, educational and cultural facilities, recreational amenities and a good transportation system. Low-rise buildings line the street fronts and provide direct entries from the sidewalk. As a high-density district, tall buildings will be sited and scaled to assure compatibility with the pedestrian environment, adjoining districts and view planes.

\* Please elaborate on the plan for achieving the "necessary public facilities" in terms of locations, square footages, etc. This may be an area where FAR bonuses and other types of incentives may help achieve these—if those incentives are sufficient to offset the potential required contributions here.

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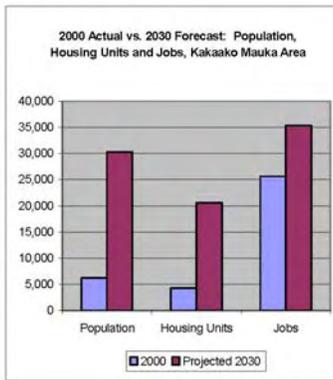
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*Marin Tower in Chinatown is a successful example of mixed use development in an urban village setting. The street level is lined by small retail stores, with housing developed above. An apartment tower is sited in the middle of the block, with access to the lobby via a pedestrian arcade at street level. The building also includes public and resident parking. Atop to parking garage is a recreation deck for residents.*

### 3.2 Create Great Places

Sustainable neighborhoods need great public spaces where people can congregate and recreate. Public spaces may include parks and plazas and can take a variety of forms and sizes to support a range of uses including:

- Active recreation with formal outdoor play fields and courts.
- Venues for performance and entertainment.
- People-watching and informal dining spots.
- Quiet places to sit and relax.

\* These are great principles. Incentives for providing some of these should be considered in various forms, including fee waivers, e.g., for providing—or funding for more than passive park areas.  
\* Incentives should be provided to landowners and developers in exchange for adding extra beautifying elements like public art and historic and cultural memorials and extra way finding tools and icons and other unique elements that add unique beauty and/or utility and functionality to the area.

The value of streets as public places is often overlooked. These, too, can take a variety of form and purpose. Wider streets can take the form of a parkway, with tree-lined sidewalks and landscaped medians. Streets can be designed specifically for transit, pedestrian or bicycle use. Along pedestrian-oriented streets, features such as arcades and outdoor dining areas enhance the ambience of the street and promote a greater level of activity.

\* If arcades are required, please draft the rules for flexibility in this area since arcades, not well done, such as if too deep/large, can alienate potential customers from businesses. The design of the arcade must not in any way restrict the build-to of the building above the arcade.

*The treatment of streets and pedestrian arcades is an important part of creating great spaces in an urban village because they serve as places to linger and enjoy as well as attractive connections between activity areas and destinations.*

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### 3.3 Make the Connections

The Mauka Area has the potential to provide convenient access to a wide range of services and activities via walking, bicycling or transit. At present, the circulation system is designed to support vehicular traffic rather than other travel modes. To foster the development of an urban village environment, it is essential to restore a balance to support other modes of transportation. A variety of routes for vehicles, bicycles and pedestrians is proposed to distribute traffic and provide alternative ways to navigate through and around the district.

Stronger pedestrian and bicycle links across high-capacity streets are needed to adjoin Kakaako with areas outside of the district. Honolulu’s planned High Capacity Transit System (HCTS) is proposed to traverse through the Mauka Area and provide two transit stations within the district. This will enable a connection between Kakaako and other areas of Oahu beyond the primary urban center. Buses will continue to be an important component of public transit.

### 4.0 Land Use Plan

The Land Use Plan for the Mauka Area has been developed to create a well-balanced mixed-use community that reflects the guidance policies enacted by the State Legislature. A key principle for the Kakaako district is to create a vibrant community where people are able to live, work, shop and recreate in close proximity. Activities are to be located to provide primary reliance on public transportation and pedestrian facilities for internal circulation. The Mauka Area Plan proposes a mixed-use district, where uses can be mixed horizontally as well as vertically. A mixed-use district well planned within a sound and balanced entitlements facility, can maximize the highest use of prime urban land by letting developers respond to and provide for market needs.

As established in 1982, the Land Use Plan is based on a maximum allocation of 36.1 million square feet of floor area to be distributed among three principle land uses - residential, commercial and industrial uses. In addition, community service and public uses are also essential in creating a well-balanced community. A summary of the proposed land uses is presented below and illustrated in Figure 4-1.

*Safe crossings for pedestrians and bicycles will be a priority for Mauka Area streets. Buses will continue to be an important component public transit. Wide sidewalks are proposed to accommodate bus shelters and other amenities such as route information, benches and trash receptacles.*

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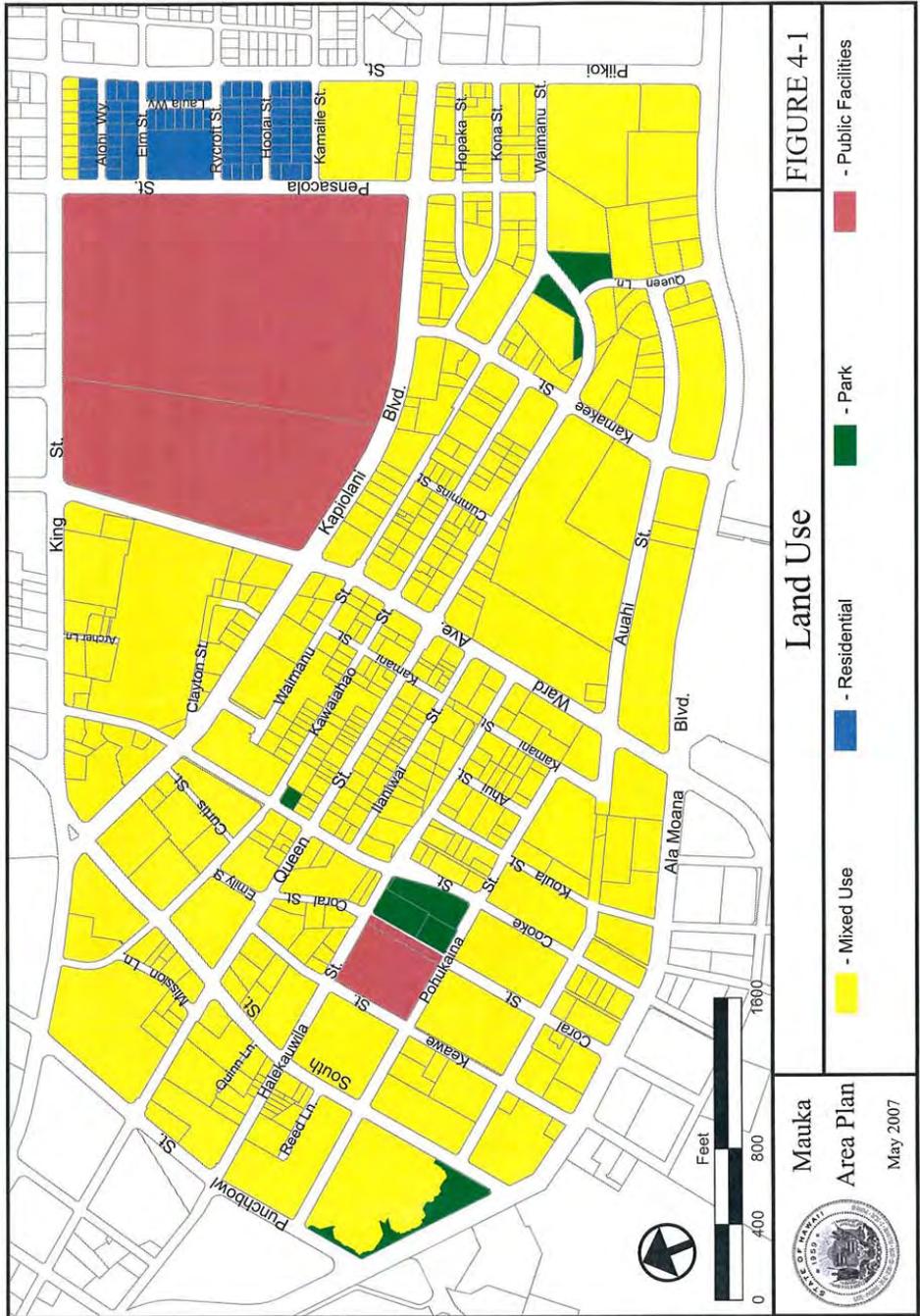
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**Mixed-Use Zone (MUZ).** The MUZ allows for the development of commercial, residential and industrial use projects. It is anticipated that commercial, residential and industrial uses may co-exist within the same

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developments, though not all projects need to be mixed-use. The permitted uses in the MUZ shall be listed in the Mauka Area Rules.

**Mixed-Use Zone-Residential (MUZ-R).** The MUZ-R allows for the development of residential and commercial use projects. New Industrial uses are prohibited. Existing industrial uses may continue though potential conflicts and issues arising from questionable, recurring loud or harsh sound, air quality, and light pollution and light overflows into neighboring properties may affect conditions of approval for future renovations and requests for modifications from Industrial users. The purpose of MUZ-R is to allow a limited mixture of neighborhood commercial activities in areas designated for residential use. To ensure that residential emphasis of this zone is maintained, commercial activities are limited to 0.3 floor area ratio. The permitted uses in the MUZ-R shall be listed in the Mauka Area Rules.

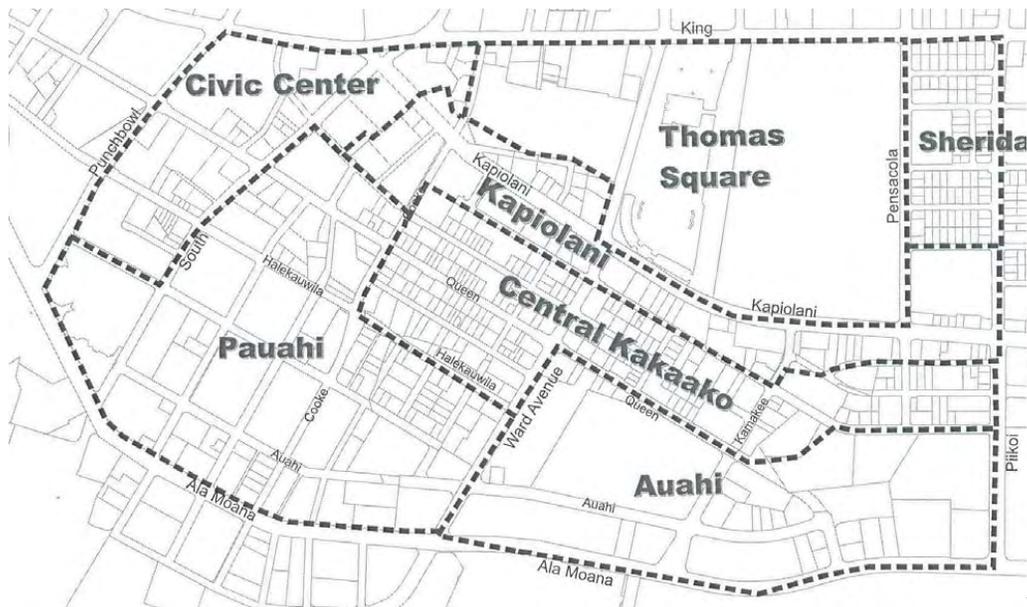
**Public (PUBLIC).** Public-zoned lands are publicly owned. The purpose of PUBLIC zone is to allow public facilities to be developed to support community redevelopment. Public uses include projects that are developed by public entities for public purpose.

**Park (PARK).** Areas designated PARK are intended for use as public parks.

Within mixed-use zones, other specific uses such as utility substations, schools, recreation and other public facilities shall be permitted. Permitted uses for each zone are listed in the Mauka Area Rules.

#### 4.1 Neighborhoods

In addition to the formation of a Land Use Plan, variations in existing and emerging land uses, building forms, and land tenure patterns, combined with the influences of major transportation corridors and adjacent districts, suggest the formation of several distinct neighborhoods within Kakaako. A strong neighborhood identity supports the viability of the larger urban district because the people who live and work in neighborhoods feel a sense of belonging to the community and recognize they have a stake in maintaining it as a desirable place. These neighborhoods are identified in Figure 4-1 and described below.



**Civic Center** is characterized by government and other important civic buildings in campus-like settings, most of which are located just beyond the Kakaako District boundary. To respect the scale and ambience of the many significant and historic buildings and in this area a building height limit of 65 feet and special yard, landscaping

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and building design standards and guidelines apply.

The **Thomas Square** neighborhood is focused on the historic park that bears this name. Some of Honolulu’s major cultural and educational venues – the Honolulu Academy of Arts, the Neal S. Blaisdell Center (NBC) and McKinley High School – are located in the vicinity of Thomas Square. The entries of the NBC Concert Hall and historic McKinley High School, both of which are within the Kakaako District, provide a graceful complement across the street from Thomas Square. The City and County of Honolulu recognized the historic and aesthetic importance of this area by adopting the Thomas Square/Honolulu Academy of Arts Special District, which establishes building height, setback, landscaping and other design controls to protect the character of the area.

**Sheridan** is a predominately residential neighborhood composed of small, fee simple lots. This established residential neighborhood also includes active commercial uses fronting King Street and the historic Makiki Christian Church located along Pensacola Street. The land use, lot size, block size and land tenure patterns are very similar to the other half of the Sheridan Tract, which is located on the Diamond Head side of Piikoi Street, just outside the Kakaako Development District. While some building renovation and redevelopment does occur in this area, the scale and pace of change is slight compared to other areas of Kakaako. Lot and block sizes are likely to perpetuate this relatively stable development pattern.

**Kapiolani** is a corridor where land uses are strongly influenced by the significant role of Kapiolani Boulevard as a high-capacity transportation route. As a link between Honolulu’s principal business and civic districts and its principal retail and resort districts, the Kapiolani corridor is an attractive location for mixed-use development, including retail stores, services and showrooms at grade level, and office and residential uses on higher floors.

The continuous canopy of monkey pod trees and wide planting strip at the curb line lends a distinctive character to the corridor that enhances its value for future development.

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*Left: The landscaped setback along Halekauwila Street forms part of the campus-like setting of the Civic Center. Right: The entry to NBC’s Concert Hall faces Thomas Square, located across King Street.*

*Left: The Sheridan neighborhood includes small, walk-up apartment buildings as well as single-family dwellings. Local streets are narrow, but have sidewalks.*



**Central Kakaako** is composed primarily of small lots in individual ownership. The predominant uses are service businesses, many with an industrial character, such as repair shops and production facilities. Central Kakaako is valued as a convenient location for service businesses, but its functionality is hampered by inadequate parking, storm drainage and sidewalks. These conditions will be an even greater impediment as surrounding

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neighborhoods such as Kapiolani, Auahi and Pauahi redevelop. Therefore, the strategy for Central Kakaako is support the viability of small business use while allowing for potential future re-use of small properties in this neighborhood through selective improvements to streets and parking.

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*This rendering of Cooke Street in the Pauahi neighborhood illustrates desired future conditions along “green” streets, with wide sidewalks, low-rise building elements framing the street, and active building facades that open toward the street. Please include a glossary including definitions of such things as “green” streets. While it would be nice to be included only in the Rules, it may help stakeholders better analyze things if such terms were formally defined.*



**Auahi** is a neighborhood whose focal point is emerging as a retail and entertainment center along Auahi Street. Recent entertainment retail development has generated a marked increase in pedestrian activity, particularly in the vicinity of the intersection of Auahi and Kamakee Streets. Auahi has also seen a significant number of high-rise residential projects, especially during the past decade. Most of the land area in this neighborhood is under a single ownership, so mixed use development is expected to proceed pursuant to a master plan. New street connections are needed in this area to break up large blocks and provide alternative routes for pedestrians, as well as service and passenger vehicles. This could be complemented by through-block pedestrian arcades. The City and County of Honolulu’s proposed high-capacity transit project designates a site in this neighborhood for a transit station, which is a major opportunity for transit-oriented development in this area. The Auahi neighborhood’s strategic location gives it excellent potential for development as a mixed use urban village, relying on improvements to public transit and pedestrian facilities and amenities.

\* We recommend that Auahi street itself be re-opened to restore circulation and connectivity and for both pedestrian—and vehicular traffic to move between both the Auahi and Pauahi areas.

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**Pauahi** is a potential mixed-use “urban village” neighborhood that has not yet emerged. The name of the neighborhood honors the legacy of Princess Bernice Pauahi Bishop, who was the benefactor of Kamehameha Schools – the major landowner in this area. The historic Mother Waldron Park is the suggested focus for this neighborhood when facing Mauka from Ala Moana Boulevard. Otherwise, the suggested focus is its natural connection towards to the ocean and the Makai side. New street connections are needed in Pauahi to provide better circulation for both vehicles and pedestrians as the neighborhood redevelops. The re-opening of Auahi street would be a major step forward to achieve better circulation and increase the life flow throughout the area.

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### Piikoi Street

## 5.0 Urban Design:

The key concepts of the Mauka Area Plan remain based on HCDA's legislative mandate to redevelop the district so that a new planned community can be developed in consonance with the surrounding urban areas. Below are guiding elements to shape and transform Kakaako into an outstanding community that is integrated into the context of urban Honolulu.

### 5.1 Principles

#### Outstanding Pedestrian Environment

Active street life is an essential ingredient for an urban village. While not every street needs to have wide sidewalks designed to attract large numbers of pedestrians, all should provide safe, pleasant, human-scaled walking conditions so that pedestrians have convenient routes to navigate through the neighborhoods for all kinds of trip purposes, including casual recreation and exercise. Appropriate design of the pedestrian realm includes not just the sidewalks and crosswalks, but also the design of buildings along the street. Low-rise building elements are sited next to the sidewalk to enclose the street space, with pedestrian entries, windows and other openings at grade level to promote convenient access and visual interest and activity along the sidewalk. The sidewalk is shaded by street trees at the curb line and/or building overhangs, canopies and arcades.

\* Given the potential costs of things like certain types of arcades, please consider guiding the Rules to provide incentives for certain types of arcades, depending on the quality and extent and size of the arcades desired.

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#### Create a network of green streets

Kakaako's circulation system will be organized according to a typology and hierarchy described by each street's function and the character of uses and building design along the street. Some streets will have particular importance as public spaces, supporting a significant level of pedestrian activity and providing connections between public open spaces and destinations. Along these streets, there is emphasis on wide sidewalks with ample canopies of street trees and other pedestrian amenities, thus giving them the character of "green" streets. To create continuous pathways, curb cuts for vehicular driveways will be allowed only if there is no alternative access to a lot.

Re-opening and thereby re-connecting Auahi between Ward and Koula streets will be essential to realizing this vision.

Presumably, if this is the definition, can it be called out, e.g. (hereafter "green" streets)?

*Mother Waldron Park would make an excellent focal point for a new "urban village" in Pauahi, as shown in these "before" (left) and "after" (right) depictions.*

- Provide for maximum road connections

- Provide for maximum road connections

The Mauka Area Plan seeks to retain most existing streets and create new ones in neighborhoods poised for significant redevelopment. The street system will enable alternative routes for circulation and access to properties. This will reduce the traffic burden on principal streets and provide more convenient routes for all modes of travel. The circulation system will also organize streets according to their intended transportation function. The Mauka Area Plan seeks to retain most existing streets and create new ones in neighborhoods

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poised for significant redevelopment. The street system will enable alternative routes for circulation and access to properties. This will reduce the traffic burden on principal streets and provide more convenient routes for all modes of travel. The circulation system will also organize streets according to their intended transportation function.

These points seem to strongly support re-opening Auahi, between Ward and Koula. This may mean allowing for land swaps or for building over Auahi due to private property rights. To the extent that air space development may be the best solution, we recommend it be considered to be addressed in the MAP or that the plan contemplate and facilitate this likely coming modification.

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Because of their important function as high-volume traffic corridors, Ward Avenue and Ala Moana Boulevard will remain busy thoroughfares. As presently designed, they act as a barrier to pedestrian movement across their rights-of-way. This will become a pronounced impediment to access as neighborhoods develop as urban villages. Both Ward Avenue and Ala Moana Boulevard could become seams rather than hard edges if they were modified to include a center landscaped median to provide a refuge to crossing pedestrians, more attractive, wider sidewalks on either side of the roadway, and more favorable crosswalk design at key intersections to provide connectivity, especially between segments of "green" streets and between the Mauka Area's neighborhoods and recreational destinations. Because of their important function as high-volume traffic corridors, Ward Avenue and Ala Moana Boulevard will remain busy thoroughfares. As presently designed, they act as a barrier to pedestrian movement across their rights-of-way. This will become a pronounced impediment to access as neighborhoods develop as urban villages. Both Ward Avenue and Ala Moana Boulevard could become seams rather than hard edges if they were modified to include a center landscaped median to provide a refuge to crossing pedestrians, more attractive, wider sidewalks on either side of the roadway, and more favorable crosswalk design at key intersections to provide connectivity, especially between segments of "green" streets and between the Mauka Area's neighborhoods and recreational destinations.



**Intersections needing special pedestrian crosswalk treatment, circled at left, are:**

- Ala Moana-Cooke
- Ala Moana - Piikoi
- Ala Moana-Ward
- Ala Moana-Kamakee
- Ward-Pohukaina - Pohukaina

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*This rendering of Cooke Street in the Pauahi neighborhood illustrates desired future conditions along “green” streets, with wide sidewalks, low-rise building elements framing the street, and active building facades that open toward the street.*

## Strong Mauka-Makai Linkage

As identified in the Makai Area Plan, the Mauka-Makai Promenade identifies a landscaped pedestrianway that links the Kakaako Waterfront Park with Mother Waldron Playground. With the support of adjacent landowners, this urban design element will form a linear spine, promoting the reintegration of the City and waterfront.

\* Rather than pedestrianway please consider something more like a “multi-use pathway.” This could take into account walking, cycling, rollerblading, walking pets, etc.

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### • Support the small-lot, mixed-use pattern of Central Kakaako

Central Kakaako contains many small businesses that continue to operate under adverse conditions of inadequate storm drainage, rugged street surfaces, narrow vehicular travel lanes and very limited parking, most of which consists of the informal use of streets and front yards. To remain viable over the long term as a small business neighborhood, and to accommodate the potential for future higher use on small properties, Central Kakaako will need improvements to these conditions. The timing of these improvements is critical, however. If it is too soon, it will disrupt and possibly displace existing businesses. For this reason, the Mauka Area Plan proposes that improvement districts be initiated only on the petition of a majority of property owners of the affected area, and that the properties be allowed the same density (3.5 floor area ratio) and maximum base building height (65 feet) as other redevelopment neighborhoods. \* Explore a 4.0 FAR minimum before bonuses baseline to allow developers more space to overcome the difficulties of development in the islands. Explore maximum FAR of 8.0 with bonuses. The issue would be that if the area can support it should more uses be allowed within the area. To the extent uses are mixed, such planning could facilitate more people using less land while achieving more of their daily needs in less time.

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### • Support Transit Oriented Development

Transit oriented development (TOD) is an area that is designed to maximize access to public transportation and often incorporates features to encourage transit ridership. A TOD neighborhood will typically have transit station surrounded by relatively high-density development within a 10-minute walk surrounding the train station. Features of TOD include mixed-use development that will use transit at all times of the day, excellent pedestrian facilities, collector support from other modes of transportation (buses and shuttles), and reduced amounts of parking for personal vehicles.

Please elaborate (or insert a ranking table) on the type of development likely “to use transit at all times of the day” or close to it to help guide planning in TOD neighborhoods. E.g., it would seem that commuters from Kapolei would use it perhaps twice a day. It would seem that other commuters would be using it this way also. Not that it won’t be used for other than commuting purposes but it would be good to identify the types of developments contemplated to use the services with such frequency. Please include data showing the amount of commuters who could theoretically commute along the route.

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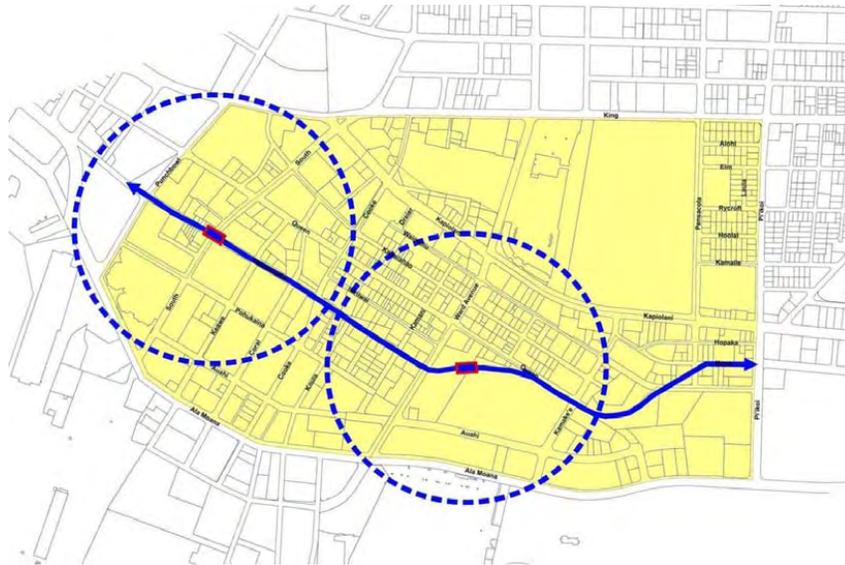
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Separate out those who live along the route from those who must commute to the stops from, say Mililani. Please show statistics showing likeliness to use as distance decreases from the city of origin to the transit stops. This information could be used for the purposes of this section—but also for planning parking in the area. Please describe more of the vision and backup data or analogies and even guesstimates of percentage declines for the “collector support” and the “reduced amounts of parking.” If this could be translated into showing the potential impact on parking ratios, that would be very helpful. E.g., if parking ratios were 3 spaces per 1000 square feet but that they would likely come down to 2 per 1000 required within three years after transit launch, that would be very helpful. The rules could be adjusted or be adjustable as transit nears or developers could make cases for parking requirement adjustments as transit evolves. Note that experienced developers tend to be conservative in this area, preferring to have at least a minimum number of parking spaces for their customers. To speculatively underpark could be disastrous for a developer.

In February 2007, the Honolulu City Council approved the mass transit Minimum Operable Segment, the First Project of the fixed guideway transit system. The First Project goes from East Kapolei to Ala Moana Center, with the preferred alignment running through the Mauka Area. Two transit stations are proposed for the Mauka Area. Concentrating residences and businesses around a transit station benefits transit ridership and creates the potential for active urban spaces. A reliable high capacity transit system, along with good pedestrian facilities, a range of housing choices, and retail uses and services will enable Kakaako residents to reduce dependence on the automobile.

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The City is currently in the process of developing TOD provisions for the entire transit route. It is anticipated that standards for TODs will be incorporated into the Mauka Area Plan as an added overlay upon completion of the City’s TOD development process.



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## 5.2 Development Provisions

All development proposals are required to obtain a development permit. Procedures for development permits are provided in the Mauka Area Rules.

### 5.2.1 Density and Building Height

The urban form in the Mauka Area will be diverse with a mix of structures and building types. Properties in Mauka are allowed to develop to a base maximum FAR of 3.5, with the following exceptions:

\* Explore 4.0 FAR or greater minimum before bonus or incentive baseline to allow developers more space to overcome the difficulties of development in the islands.

\* Bonuses may be given for certain types of street dedications—or public access through private streets.

\* To better help the area develop and let the market inform where FAR may be best applied, please consider intra-district density transfer rights—not only on adjacent sites but to other sites within the district. This could help landowners and developers address specific needs in specific parts of the District.

\* Landowners may transfer floor area capacity to any of their properties except where the entitling agencies can make a case that such a transfer would present an undue burden and an undue hardship on properties adjoining those properties of the landowner.

• In Sheridan, all lots other than those that front King Street will have a maximum FAR of 2.0 to reflect the residential use pattern and building scale of the neighborhood.

• In areas where infrastructure has not been upgraded pursuant to an improvement district and/or where streets do not meet the standards set forth in Chapter 7, Transportation, the maximum FAR will remain 1.5. After infrastructure improvements are made, the FAR will be increased to 3.5.

\* Landowners and Developers may receive FAR bonuses based on compliance with the bonus or incentive density program included herein or based on bonus or incentive density requests applied for in exchange for additional public realm enhancements and public benefits within the MAP boundary or outside it based on the circumstances of the request.

Maximum building heights were determined on the basis of extensive three-dimension computer modeling of topographic conditions, existing building form, potential building form, and photographic surveys.

\* Please include other important to critical factors, such as construction costs, market appeal, tourism impacts, development and construction practicability, etc., to provide the area with the best chance for revitalization and to see the area grow as the State Legislature and others have envisioned.

Areas such as parking, parking structures, outdoor improved and outdoor common areas, covered sidewalks, lanais and balconies are not included in FAR calculations.

To promote active uses at street level and pedestrian-scaled building forms, building form guidelines are organized into three elements: the Street-Front Element, the Mid-Height Element, and the Tower Element. Each

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of these elements is described below.

**Street-front Element.** This building element is required along all street-fronts, sited adjacent to the street along a build-to line. The intent is to create a consistent street wall that defines the street as a public space.

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Where blocks are large enough, landowners may subdivide their parcels so that one parcel may achieve the building element requirement along street-fronts with build-to line requirements and the other on the subdivided parcel may be able to adapt another urban form. The purpose of this would be to allow for greater variety in this part of the built environment. This could reduce the probability of the built-to line requirement sapping FAR height potential.

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While consistency is often desirable, developers may present a case for a welcome or engaging variety to the consistent street wall. Public art or green space relief or a garden or fountain or other object may be an accepted example of such variety. Such a request will be approved unless it no reasonable person could find such planned variety warranted. The governing authority will make such conditions as required to ensure substantial or material conformance between the realized final work and the plans submitted.

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Along blocks planned for Promenade sidewalks [exhibit citation(s) needed], the Street-front Element must house active uses, such as offices, residences, and retail. On the ground floor, building entries and windows are required. Parking structure use is allowed above the ground floor on blocks not designated for Promenade treatment.

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\* Going into this area especially, the MAP considers a number of important perspectives. We strongly encourage the HCDA to consider economic viability and development practicability to their matrix of considerations.

Max Height: 75 feet. \* Please consider raising this to at least 75 feet. From what I understand, and we are trying to check into this further, construction costs may be stable from somewhere below 65 feet then up through 65 feet up and up to 75 feet. The significance of this is as follows. Hawaii has very high construction costs, often allowing only the most high end products to attain feasibility. If you let the max height rise to 75, at least, for this element, then the developer has more incentive to develop a program in this range. This potential extra floor could help a project achieve feasibility.

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Min Height: Four stories or 40 feet, whichever is greater.

Mid-Height Element. The maximum height of this element is defined by view planes from shoreline parks looking towards the Koolau mountains. Maximum building heights increase with distance from the shoreline. The intent is to encourage projects that maintain Mauka-Makai view planes. Developments that do not exceed Mid-Height Element limits do not require a Planned Development permit.

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\* Please include a glossary for all terms of art, such as "Planned Development."

\* Please include pictures elaborating on the above. Please consider in this evaluation the pictures included below in Exhibit: Views from the Shoreline Area.

Max Height: Range of heights 80-215 feet.

Footprint: No restriction, aside from Street-front Element and Height Setback requirements.

\* Please include a definition of Footprint and one for Floorplate and whether they mean one and the same thing here. We recommend a distinction between them as some newer designed buildings floorplates cantilever over their footprints

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**Tower Element.** This includes any building element that is taller than the Mid-Height Element. The intent is to

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provide for taller buildings and variation in the skyline while keeping a slender profile as the building rises in height.

When a project has a Tower Element, a Planned Development permit will be required to evaluate the impact of the tower on Mauka views and the appearance of the tower as viewed from the street and distant locations.

\* Please clarify, if only by example, the location of a few "distant locations." Please also elaborate on view types.

E.g., given the existing views from the Kaka'ako Waterfront Park looking back Mauka one question that should be considered is the types of views contemplated and planned for. I.e., the Mauka view from Kaka'ako Waterfront is now an urban view. If the Mauka area is to serve the people in an urban context, then due consideration should be given to the urban view opportunities. Views of the Mauka hills would be beautiful. However, they are hard to achieve given that so many of the potential views are already "built over" or blocked. In addition, the distance Makai required to recover good views of the Mauka hills may be unachievable without a boat.

\* Furthermore, coming development Diamond Head of the JABSOM, even if only the same height as the JABSOM building will have the same effect as the JABSOM – from the parking lot level. There are no views from the parking lot level. To get a some view looking Mauka you virtually have to climb to the top of the one hill

Max Height: 400 feet except where one or more FAR or other bonuses may allow greater height

Except:

100 feet max height for that section of Ala Moana Boulevard fronting Kewalo Basin

240 feet max height for that section along Ala Moana Boulevard between Punchbowl Street and Queen

Lane where there are no 240' or higher towers within 1/2 mile of the target site. Where there are buildings 240' or higher within 1/2 mile of the proposed project site, the 400' height limit will hold. However, in such cases the tower element of the project will be set back from the street approximately \_\_\_\_\_ feet.

- please include a map showing the location of these special sections and showing Queen Land
- please explore construction cost switchpoints. I believe you may find that one is at the 240 foot level. This would mean that a developer's cost per square foot may stay level up until they exceed the 240 foot level. At that point, construction costs per square foot may step up, such as for structural support reasons. Items like this could help give the area a better chance of being developed by giving developers a better chance at succeeding.

Max Footprint: no change, keep as found in existing Rules. However, allow for FAR bonuses or transfer of floor area throughout the district and to other landowners in exchange for \_\_\_\_\_ % (e.g., 25% or more) smaller floorplates along the Ala Moana blocks.

\* Please include various samples of how height may be achieved given the various build-to and street wall and podium level requirements. The concern being how difficult these lower level massing requirements make it to achieve 400 feet in height.

\* Please explore the following option and include a response to this in either a report or the revised MAP (Mauka Area Plan). Where floorplates are ultimately required to be below 9,000 square feet, developers may be reasonably allowed to incorporate scissored stairs into their project.

\* Footprints

Length-to-Width Ratio

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for Tower Footprint: 3:1 The language is unclear here. Please consider changing it to something like: Length to Width Ratios may go from 1:1 up to 3:1 so long as, if one face is 1.5:1 or greater that the longer face/wall run generally mauka-makai. This may vary somewhat depending on how far mauka of Ala Moana Boulevard the site is and how close sites are to the proposed transit lines along Halekauwila.

\* Floorplates may vary from floor to floor and somewhat from a narrow ground level footprint envelope so long as all Floorplates stay within setbacks from property lines and are proven safe from an engineering standpoint.

\* consider a range here which may be between 2:1 to 3:1 or within some percent thereof. It may be physically difficult on some lots to achieve such a fixed ratio and may result in unnecessary building efficiency loss and therefore be an economic disincentive to build.

\* Please also consider impact of 3:1 L2W ratio on Diamond Head:Ewa view planes.

\* Please also consider and report on the heat absorption/cooling efficiency environmental aspect of 3:1 Mauka Makai facing buildings that may improve Mauka Makai view corridors but absorb great amounts of heat by having long walls facing the western sun.

\* Please elaborate to make clear where the L2W ratio starts when it interfaces the podium or partially or fully with the ground. Doing so will make it easier for developers and planning staff as they strive to implement and to ensure compliance with the forthcoming rules.

\* Please show the impact of the 3:1 L2W on tower spacing to minimize certain types of wall effects.

\* Please include the shadow implications study of the various ratios, including the 3:1 ratio

\* Please show the height capacity limitations of the 3:1 if along areas where build to lines and lower height requirements are in existence.

\* Please clarify the sentence on page 23 "mauka-makai dimension must be greater at least as long, but no greater than three times the length of the ewa-diamondhead dimension." E.g., would it be reasonable to interpret that to mean "mauka-makai dimension must be greater or at least as long as the ewa-diamondhead dimension , but, if greater, may be no greater than three times the ewa-diamond head dimension"? If that is the case, then such a clarification would be helpful.

Consideration should be given to achieving view corridors and visual relief whether looking mauka-makai and Diamond Head-Ewa. This does not mean or necessarily mean seeing landmarks necessarily so much as it means at least allowing reasonable and welcome measures of light to reach the streets and to avoid creating dark urban canyons.

Tower Orientation: Longer side of tower to be oriented Mauka-Makai

In general, all faces of a building, including those with curtain-wall surfaces, should be articulated with windows, lanais or other openings and variations in color and texture, except for those exterior walls that directly adjoin, or will adjoin, another building. Such elements shall not be counted as FAR and floorplates or footprints. Window treatments and other similar lightly protruding items, extending no more than eight inches from the main building walls shall not be counted for setback purposes. Parking, service areas, mechanical equipment and other utilitarian building elements should be screened from public view; i.e., from streets and public parks and plazas.

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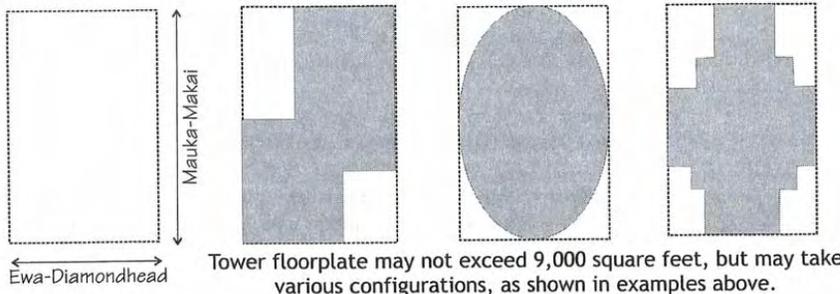
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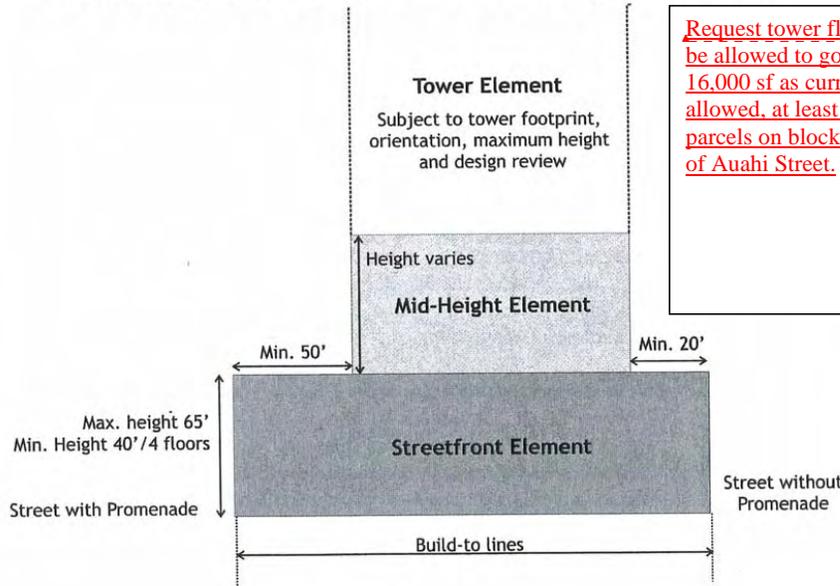
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## Envelope for Tower Element

The tower must fit within a rectangular envelope, within which a portion of the tower touches each side of the rectangle. The mauka-makai dimension must be greater at least as long, but no greater than three times, the length of the ewa-diamondhead dimension.



## Envelope for Combined Building Elements



Request tower floorplates be allowed to go to 16,000 sf as currently allowed, at least for parcels on blocks mauka of Auahi Street.

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## 6.0 Parks, Open Space and Views

### 6.1 Existing Conditions and Projected Need

#### 6.1.1 Existing public parks and recreation facilities

The Mauka Area contains approximately 9 acres of existing park space provided in public as well as privately dedicated parks. For practical use purposes, please include Ala Moana park's acreage or at least a reasonable percentage of it. For all intents and purposes, residents and visitors will treat it like it is part of the general area.

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Many people will prefer using it to some of the smaller parks, especially smaller parks away from the ocean.

• **Mother Waldron Playground** is a 3-acre park that includes outdoor basketball and volleyball courts, play apparatus, a grassed field, and a historic public restrooms and equipment storage area. The Mother Waldron Playground is listed on the National Register of Historic Sites because of its Art Deco features.

• **Queen Park** is a 2-acre passive park located within the Auahi neighborhood. Queen Park traverses Queen Street between Waimanu and Kamakee Streets. Design of Queen Park involved a comprehensive public input process, whereby community members and government entities determined the design and amenities to be provided.

• Two private passive parks open to the public developed in conjunction with planned development projects have been dedicated for public use. One park is located on the corner of Kawaiahao and Cooke Streets and the other is part of the Waterfront Plaza project located along Ala Moana Boulevard.

In addition to public parks, private developments are required to provide on-site recreational space. To date, 17 acres of private recreational space have been developed in the Mauka Area.

The Makai Area features two substantial shoreline parks and is considered a community as well as regional recreational resource for Kakaako. The Kakaako Waterfront Park is comprised of approximately 34 acres and includes the Kakaako Gateway Park that connects the Mauka and Makai Areas. Please include a map and table showing the various parcels that total the 34 acres. The Kewalo Basin Park is approximately 5 acres and is a popular fishing spot for residents and visitors as well as a surfing and ocean entry point.

### 6.1.2 Projected need for park space

The amount of land committed to public park space falls far short of the City and County of Honolulu's Park Planning Standards, which call for 2 acres of community-based park space per 1,000 residents of an area. By 2030, the Mauka Area is projected to have a resident population of 30,000, which implies the need for 60 acres of park space.

Please be sure to include Ala Moana Park.

Please consider the target market for this area which may be young and older people w/o kids. Many of this type of target market will probably want to go to play tennis, walk, or surf at Ala Moana Park (AMP). So, even if AMP is not w/in the drawn lines of the MAP it will be in the functional service area for practical park purposes.

This doesn't mean pocket parks won't be of value within the MAP area. They could be programmed to include convenient outdoor exercise stops for coming people who want to walk the area.

However, to the extent pocket parks are requested, please consider the security costs given the high number of homeless living in the area.

It is unrealistic to expect that such a large amount of land can be acquired for public parks in a built-up urban area like Kakaako where land costs are high and most properties are currently in use. Therefore, a combination of strategies is needed to meet the demand for parks and outdoor recreation, including optimal use of vacant public land, shared use of existing public recreation facilities, use of public streets to encourage pedestrian connections

#### • Ward-Queen • Ward-Queen

*The proposed expansion site for Mother Waldron Park is adjacent to Pohukaina Street; a "green" street that runs Ewa-*

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*Diamond Head through the Pauahi neighborhood.*

to nearby public parks, and leveraging private investment in parks and recreation facilities.

## 6.2 Strategies for Meeting the Projected Need

### 6.2.1 Use of vacant public land

Next to Mother Waldron Park is the State-owned former site of the Pohukaina Elementary School. A portion of this site has recently been committed to the development of an affordable housing project, to include a community room at the ground floor. The remainder of this site may be used for a new elementary school if new housing development in Kakaako spurs a resurgence of school-age population. If a school is built at this site, it should be designed to complement Mother Waldron Park in scale, orientation and façade treatment to respect the historic character of the park. It should also provide some additional outdoor recreation facilities for children on the school grounds itself. If a public school is not built on this site, it should be used instead for expansion of Mother Waldron Park.



*Right: The tree canopy is a striking feature of the Kapiolani corridor, which attracts mixed-use development.*

### 6.2.2 Shared use of public recreation facilities

McKinley High School's campus contains the most significant publicly-owned outdoor recreation facilities in Mauka Area, including softball and baseball diamonds, tennis courts, basketball and volleyball courts, and a football/soccer field surrounded by a track. While these facilities are used for the school's physical education and athletic programs, they are sometimes available during evenings, weekends and summer months for general community use, with the prior permission of the school administration. A more formal joint school/community use arrangement, combined with improvement of the adjoining 3.5-acre site, is really the only practical option for making a wide range of active outdoor recreation facilities available to the public in Mauka Area.

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### 6.2.3 Pedestrian connections to nearby public parks and campuses

As a centrally-located urban district, the Mauka Area offers a wide array of places within walking or bicycling distance where residents can go for recreation, including expansive shoreline parks and inland public squares and campuses. Kakaako Waterfront Park, Ala Moana Regional Park and Kewalo Peninsula Park are located on the makai end of the District. The lovely landscaped grounds of Thomas Square and the Civic Center are at the mauka edge of the District and the adjoining campuses of McKinley High School and NBC are within the district itself. Walking and bicycling are not just environmentally-friendly and cost-effective modes of travel, they are also a form of outdoor recreation and exercise that promotes a healthy lifestyle.



In addition to park space, the following streets are proposed to be improved to accommodate pedestrian and bicycle routes through Mauka Area. These tree-lined streets will connect major parks within and outside of the district:

- Cooke Street – a designated “green” street -- borders Mother Waldron Park and provides a connection from the Pauahi neighborhood to the entry to Kakaako Waterfront Park on the other side of Ala Moana Boulevard.

- Pohukaina Street – another “green” street – runs adjacent to Mother Waldron Park and links the Pauahi neighborhood to the Civic Center.

- Kamakee Street – a “green” street – links the Auahi neighborhood to Ala Moana Regional Park, and to Thomas Square and the Young Street bikeway, via a proposed pedestrian/bicycle recreational path at the boundary between the campuses of McKinley High School and NBC.

- Piikoi Street, which is designated for marked bicycle lanes, connects the Diamond Head end of Mauka Area to Ala Moana Regional Park and Sheridan Community Park, just beyond the district boundary.

### 6.2.4 Private Investment in Open Space and Recreation Facilities

Redevelopment of private properties presents opportunities to increase the availability of public open space and

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both indoor and outdoor recreation facilities for the use of neighborhood residents.

When it comes to public open space in an urban setting, quality and location are more important than quantity and size. Successful urban plazas and pocket parks optimize the use of space by drawing people in to linger. Plazas intended for a high level of activity should be located near well-traveled nodes are framed by buildings, with entries facing the plaza. Plazas are often activated with food vendors, outdoor dining, programmed entertainment, public art and water features. There is ample seating, careful consideration of shade and wind patterns, and attractive landscaping, paving, furnishing, and other details. Figure 6-1 suggests several locations for new plazas – near the intersections of Cooke Street and Ala Moana Boulevard, Ward Avenue and Auahi Street, and on Cooke Street across from Mother Waldron Park.

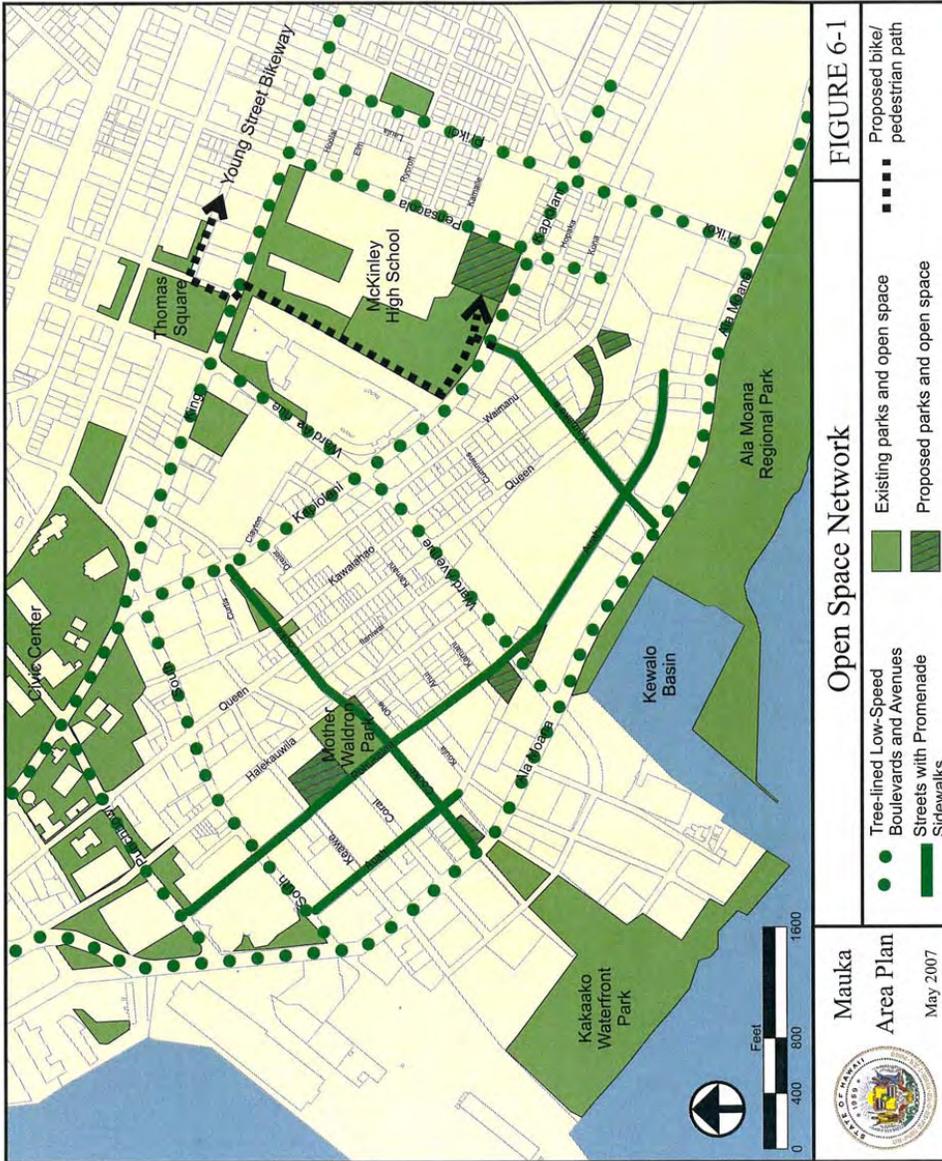
Quieter pocket parks may be located on a local street, rather than a major node. Design of pocket parks would be similar to plazas, but with greater emphasis on landscaping and omission of activity-generating elements. The existing pocket park at the corner of Cooke Street and Kawaiahao Street is appropriate in size, but it is not yet a successful space because it lacks active building facades on the two adjoining properties to frame and enliven the park.

\* Note (only). This principle of structures with people should extend to the Makai side, too.

Because Kakaako’s public park space is limited and there is little opportunity to expand the inventory, new housing developments should incorporate recreational facilities for the use of residents. Developers are required to provide on-site recreational facilities for project residents. Affordable and reserved housing projects often cannot accommodate extensive recreational amenities due to the initial construction cost, the reduction of marketable floor area, and the maintenance costs to the residents, but recreational facilities are provided on-site that reduces the demand for facilities on public land.

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We believe good planning principles (circulation, security, connectivity, high performance, convenience, lower transportation costs) beg that Auahi be opened again between Ward Ave. and Koula St.

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**6.3 Views and View Corridors**

Natural features and the development pattern of surrounding districts and neighborhoods create a context for the Kakaako District. In order to fit comfortably within that context, it is important to identify the most significant of those contextual features and propose guidelines for built form that respect and preserve them.

There are panoramic Mauka views from Kakaako Waterfront Park and Kewalo Peninsula that have been identified in the City and County of Honolulu’s Primary Urban Center Development Plan. The vantage points and associated view cones for these panoramic views are indicated below. The view cone represents an

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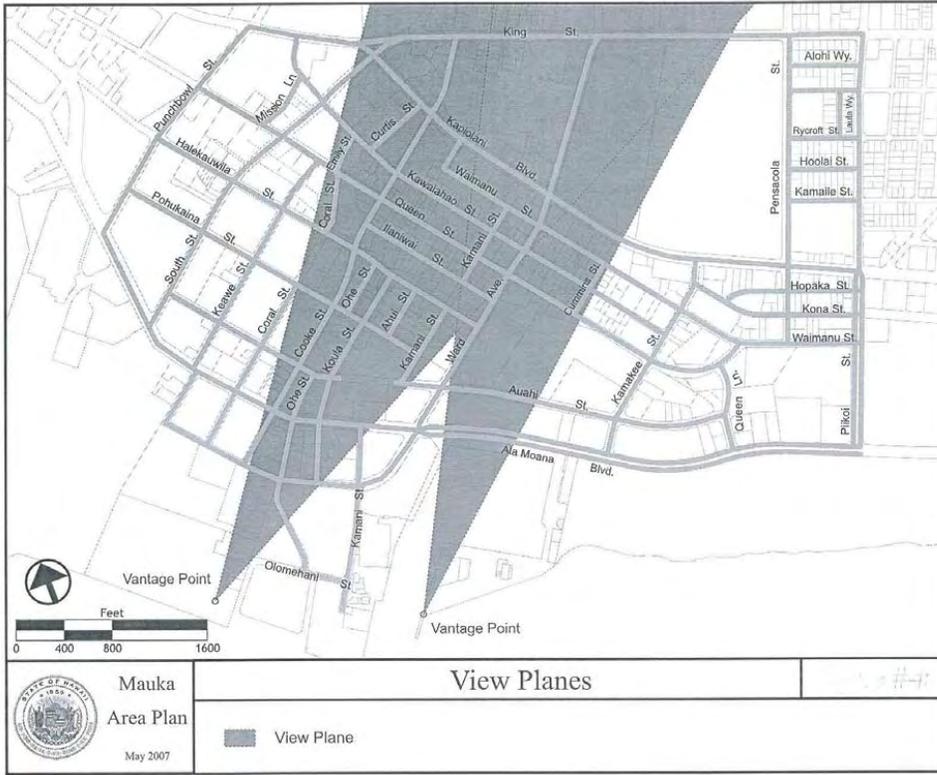
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attenuated view that remains across areas of Mauka where taller buildings are either absent or placed far enough from the shoreline that their visibility recedes and their perceived height diminishes in relationship to the mountain backdrop.



## 7.0 Transportation

The Mauka Area Plan Transportation Plan includes provisions for different modes of transportation designed to move people and goods safely and efficiently, and to service the demands of District activities. The transportation plan includes provisions for pedestrians, public transportation (transit and buses), cars, and bicycles. There is an emphasis on pedestrian movement throughout the area, in keeping with the urban village concept.

The plan for roads and transportation reflects the goal of creating a high-quality urban community, as well as the goal of providing for efficient movement of traffic. The use and form of the public street space are considered in relation to adjoining residential and commercial buildings and as an integral part of the parks and open space system.

\* Note that lowering transportation costs for RH households may suggest allowing them to achieve critical mass placement near or close to the transit stops.

### 7.1 Existing Conditions

The Mauka Area Plan includes a detailed assessment of transportation facilities and services, addressing transit, automobile, bicycle and pedestrian modes of travel. Following is a summary of existing conditions based upon

SEISPN Revisions to Mauka Area Plan KS Comments 2008.01.22 submitted Track Changes.doc Jan. 22, 08. Page 27 of 61

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an assessment of travel conditions and review of existing public transportation system.

### 7.1.1 Transit Service

The existing bus transit service between the Mauka Area and town and country destinations is very good. The high-frequency town routes provide important connections linking the Mauka Area to downtown Honolulu, Kalihi, and eastern Honolulu neighborhoods. Most of the town routes circulate on the perimeter of the Mauka Area (King Street, Kapiolani and Ala Moana Boulevards) and have walk distances of a 7-minute or ¼-mile walk.

The existing country service is frequent and serves important employee and student travel demands. The country service is well distributed in the Mauka Area and provides connection to employment centers and schools. Most of the service to outlying communities, such as Ewa, is located within a 7-minute or ¼-mile walk from major shopping and recreation destinations in and around Kakaako. This is important in connecting Kakaako to the rest of Oahu.

### 7.1.2 Automobile Travel

According to Oahu Metropolitan Planning Organization (OMPO) model forecast for 2025, which incorporated baseline data from 2000. Assuming no road improvements in the Mauka Area, twelve roadway segments would exceed peak hour capacity by 2025. The year 2000 data showed that peak hour traffic at three of the 12 locations already exceeds road capacity — South Street makai of King Street, Cooke Street makai of Kapiolani, and Ala Moana Boulevard.

The year 2025 traffic forecast highlighted the difficulty of handling peak hour traffic volumes. Many road segments in Honolulu sustain congestion during the morning or the evening peak hour. The same roadway segments typically experience satisfactory conditions during the rest of the day.

### 7.1.3 Pedestrian Travel

Pedestrian facilities in Kakaako were evaluated in terms of a continuum of pedestrian friendliness, using four classifications:

*Pedestrian Places:* These are districts of limited extent, with mixed-use land development, moderate to high densities, good transit service, great streets, and extensive pedestrian accommodation in the form of sidewalks, crosswalks, and other facilities. Here people will stroll and linger at store fronts and urban landscape features, walking for both utilitarian and recreational purposes. Pedestrian Places have people moving about between multiple activities.

*Pedestrian Supportive Environments:* These include well-designed residential and commercial neighborhoods, employment centers, parks and recreational areas. These are safe environments for walking, where sidewalks are continuous and buffered from streets and wide enough for passing and walking side by side, and where good street crossings have been provided. Land uses are either dense enough to both generate and attract utilitarian walking trips of reasonably short lengths (half mile or less), or are of the sort that will attract recreational walkers and joggers. Buildings, not parking lots, face streets.

*Pedestrian Tolerant Environments:* These are areas and corridors where walking is technically safe (there are continuous sidewalks and some kind of reasonably safe street crossings), but the land use patterns are such that little walking activity is likely to be generated. Tolerant environments provide pedestrian facilities, but include a very minimal level of accommodation.

*Pedestrian Intolerant Environments:* Pedestrian Intolerant Environments are areas where walking is unsafe and unattractive. Examples include freeway corridors, certain industrial land uses, and roadways lacking continuous sidewalks. A major characteristic of Intolerant Environments is that they lack pedestrians, either due to a lack of pedestrian accommodations and/or dominance by automobile traffic and auto-oriented land uses.

Mauka Area streets were classified according to the above criteria, as summarized in Figure 7-1. Most of the

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major streets in the Mauka Area are Pedestrian Tolerant Environments, with sidewalks but few amenities, such as trees. Intolerant pedestrian connections prevail in Central Kakaako, where many blocks lack curbs and sidewalks.

A few blocks, such as Cooke Street between Queen Street and Kapiolani Boulevard are classified as being Pedestrian Supportive Environments. Ward Centers is identified as the Mauka Area's one Pedestrian Place. In particular, the Ward Entertainment Center-Ward Centre vicinity draws pedestrians because of its wide variety of shops, restaurants and activities.

The Mauka Area walking environments consist of several sidewalk types, crosswalks and informal pathways. All of the major streets and many of the smaller streets have sidewalks that support utilitarian walking. Most of the major streets have 4'-6' sidewalks on both sides. Smaller streets with a curb and gutter have 3'-4' sidewalks on at least one side of the street. Streets without curbs and gutters do not have sidewalks. Crosswalks are present at major street intersections with pedestrian signals.

\* landowners and developers should be incentivized (full or part) to expand multi-use pathways where highly desirable.

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#### 7.1.4 Bicycle Travel

Despite the lack of safe bicycle facilities within the District, a large number of bicyclists navigate through the Mauka Area. Most bicyclists ride illegally on the sidewalk due to the high traffic volumes. Riding on sidewalks is most prevalent along one-way streets.

The Queen Street extension is the only street in the Mauka Area that has on-street bicycle facilities meeting the criteria for safe bicycling. The Queen Street extension is signed as a bike route and currently has traffic volumes that support a bike route designation. All other streets in the District are open to bicyclists by State law but offer limited protection from motor vehicle traffic.

The Honolulu Bicycle Master Plan (City & County of Honolulu, 1999) calls for establishing bike routes throughout the city, to be built incrementally. Among its second-priority projects are bike lanes on Ala Moana Boulevard, Piikoi/Pensacola, and Cooke Street.

Other forms and/or formats should be included, such as flex-cars, flex-bikes, trolleys/shuttles, etc. Please cite the website for the public to review the 1999 Bicycle Master Plan.

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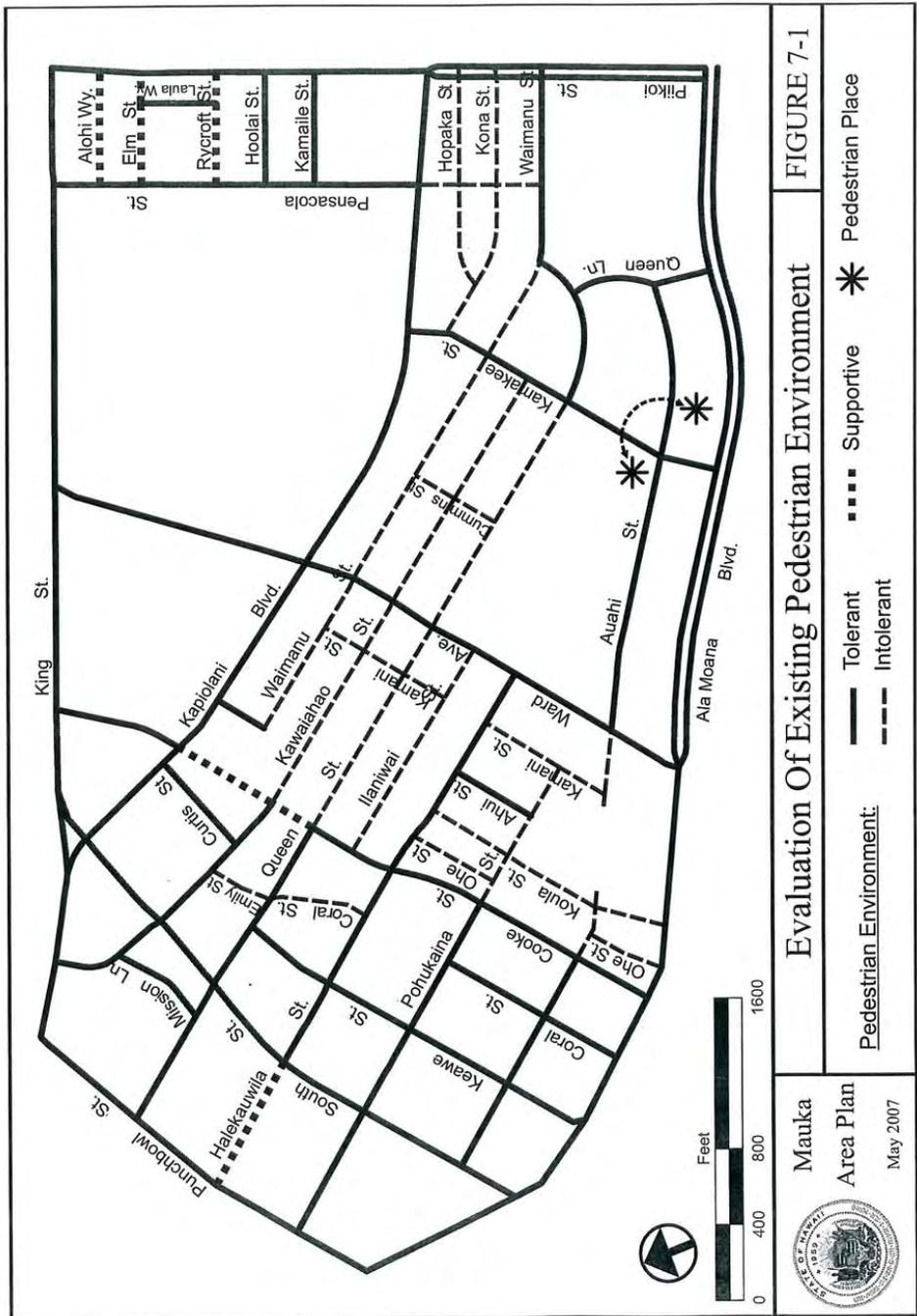
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**7.2 Principles**

The following principles were formulated to guide the long-range plan for transportation in the Mauka Area.

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Propose transportation improvements and street standards that meet the long-term goal for creating pedestrian-oriented neighborhoods and a balanced multi-modal transportation system.

Maintain current and planned road capacities to accommodate vehicular traffic. Accommodate future peak period traffic congestion by:

Build a high-capacity transit system that serves Kakaako.

Improve facilities and services for other forms of transit, walking, and bicycling.

Implement adaptive use of existing roadways (e.g., coning).

Enhance connectivity: Maintain most existing streets and add planned new street connections within large tracts, as they are redeveloped. (Opening Auahi should be included in this, of course, as has been mentioned.)

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Over the long term, upgrade streets so that all have curbs, sidewalks and drainage facilities, so that all streets are at least Pedestrian Tolerant.

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### 7.3 Transportation Plan

#### 7.3.1 Urban Road Classifications

Typical road standards do not fit older urban communities such as Kakaako, whose roads predate the current rules by decades. Moreover, current standards are typically weighted in favor of fast and efficient movement of vehicles, often to the detriment of pedestrian travel. Transportation and community planners have been working to formulate alternative standards and get them adopted.

In 2006, the Institute of Transportation Engineers (ITE) published a report entitled Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities. Published as an “ITE Proposed Recommended Practice,” the report was prepared collaboratively by engineers and planners involved in city planning. The report describes types of urban thoroughfares and provides criteria for certain roadway elements. The Mauka Area Plan uses this report as a basis for classifying the Mauka Area’s roadway network.

Low Speed Boulevard*	Walkable, low speed (35 mph or less) divided arterial thoroughfare in urban environments designed to carry both through and local traffic, pedestrians and bicyclists. Boulevards may be long corridors, typically 4 lanes but sometimes wider, serve longer trips and provide limited access to land. Boulevards may be high ridership transit corridors. Boulevards are primary goods movement and emergency response routes and use access management techniques. Curb parking may be allowed on boulevards. <u>In addition to traditional flexcars, GemCar type vehicles may also be considered – if they are available in rain proof formats.</u>
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Avenue\*

Walkable, low-to-medium speed (30 to 35 mph) urban arterial or collector thoroughfare, generally shorter in length than boulevards, serving access to abutting land. Avenues serve as primary pedestrian and bicycle routes and may serve local transit routes. Avenues do not exceed 4 lanes and access to land is a primary function. Goods movement is typically limited to local routes and deliveries. Some avenues feature a raised landscaped median. Avenues may serve commercial or mixed-use sectors and usually provide curb parking.

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Street*	<p>Walkable, low speed (25 mph) thoroughfare in urban areas primarily serving abutting property. A street is designed to connect residential neighborhoods with each other, connect neighborhoods with commercial and other districts, and connect local streets to arterials. Streets may serve as the main street of commercial or mixed-use sectors and emphasize curb parking. Goods movement is restricted to local deliveries only.</p> <p><u>* Provisioning should be considered which may allow for weekend or special event closing of select streets for public events such as for shows, simple street fairs and other occasions to facilitate community gathering and activities.</u></p>
Service Street	A Service Street is intended primarily to provide vehicular access to lots. The Service Street has two travel lanes, one parking/loading lane. The minimum right-of-way of 40 feet recognizes existing conditions in Central Kakaako, where lots are small and rights-of-way narrow. The pedestrian realm requires no front yard space and no trees.
Alley	The "Alley" type provides the most basic form of vehicular access. It has been applied to a limited number of existing roads.
*Source: Institute of Transportation Engineers, Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities, 2006; Table 4.2.	

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The Mauka Area Plan uses these types as the basis for classifying roads and setting general standards. To differentiate the smaller roadways found in Kakaako, two additional types of streets are provided - Service Street and Alley.

### 7.3.2 Plan Elements

The Roadway Plan shows existing and future Mauka Area roads, by type. See Figure 7-2. Table 7-1 provide a description of the Mauka Area street system. The "Special Features" indicate planned modifications, including the streets segments programmed for Promenade sidewalk treatment.

Comment [m1]:

Further street design guidance is provided through cross-section drawings of (a) general street types; (b) major streets proposed for change; and (c) different treatments of the pedestrian realm.

### 7.3.3 Making Connections

The Roadway Plan shows the grid of roads currently serving the Mauka Area. Future road connections are targeted for large tracts in the Pauahi and Auahi neighborhoods that are likely to be redeveloped. The lands are owned by Kamehameha Schools and General Growth Properties. The intent is to serve newly redeveloped areas by connecting new road segments with existing roads, in order to establish continuity and to reinforce the grid network.

In the area Ewa of Ward Avenue, the Roadway Plan shows that some smaller street segments may be abandoned. Many of these are privately owned, yet they should only be closed when the new road connections are built.

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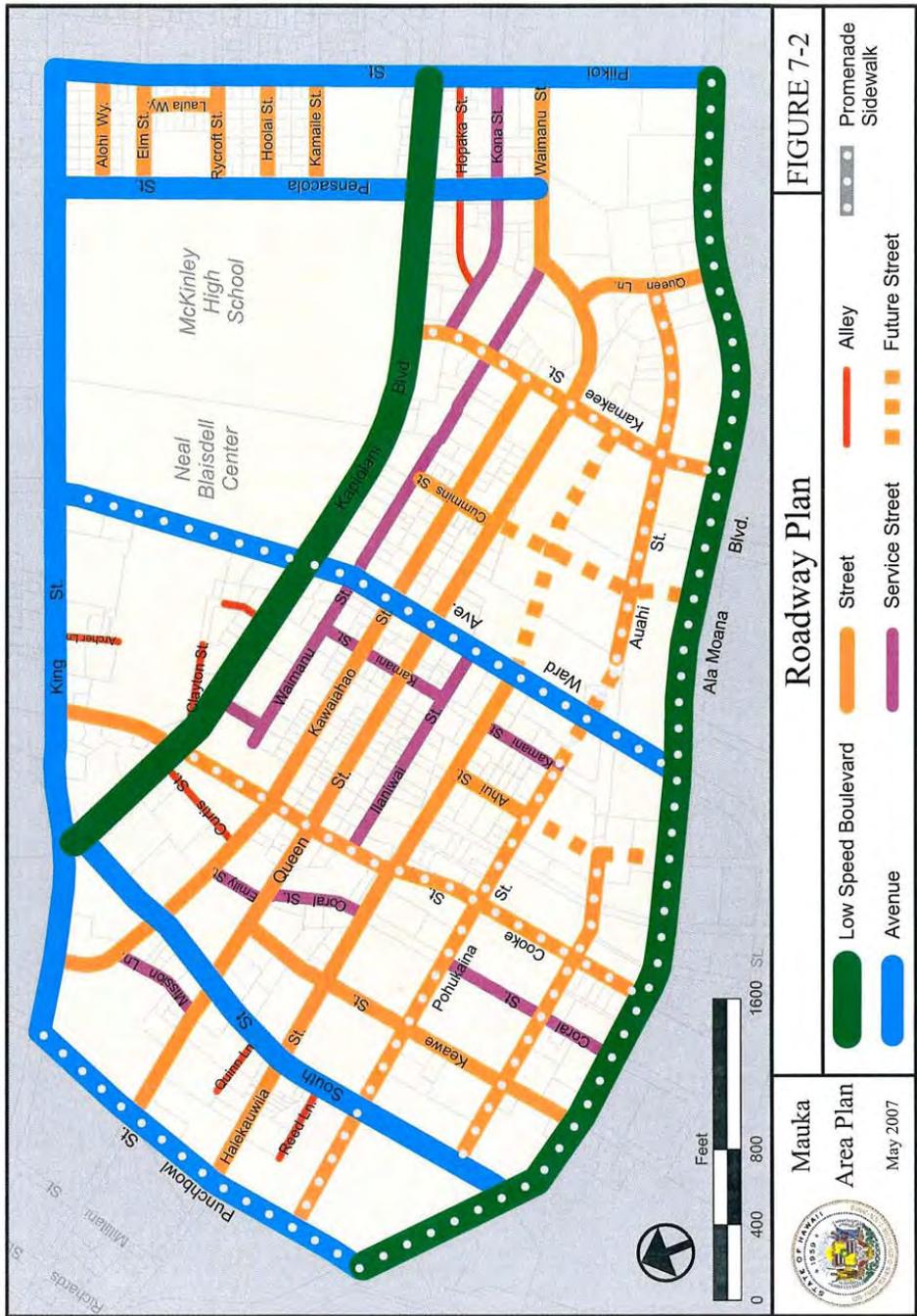


FIGURE 7-2

Most streets in Central Kakaako lack adequate storm drainage systems, sidewalks, and parking lanes. Few private properties have sufficient parking and loading areas to support the business activities on site. External market forces will

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continue to impact and change the face of this neighborhood over time.

McKinley High School's athletic facilities are located at the makai end of its campus. The vacant 3.5-acre corner of the campus near the intersection of Kapiolani Boulevard and Pensacola Street could be developed as a joint school-community recreational complex. A swimming pool is illustrated, but there could be other types of facilities or alternate site plans to complement the school's existing facilities.

The Roadway Plan proposes an extension of Pohukaina Street across Ward Avenue connecting with Auahi Street to form a continuous promenade street.

New road connections located within the Auahi and Pauahi neighborhoods are designed to provide access at intervals of no more than 500-600 feet. Pedestrian pathways should be incorporated into new development, sited to provide continuous and varied routes throughout the Mauka Area. To encourage walking, pedestrian connections should occur every 200-300 feet.

### 7.3.4 Road Types and Dimensions

The following is a list of the road types and the typical dimensions of the road right-of-way, the travelway for vehicles, and the pedestrian realm. The following is a description of the five major road classifications.

Cross-sections are prescriptive in a general sense. In planning and engineering road improvements, the Authority will consult with stakeholders, consider the particular circumstances, and make adjustments as appropriate.

No specific modification is proposed to the following roads: King Street, Kapiolani Boulevard, Punchbowl Street, and South Street. All are wide streets, however, pedestrian crossings could be improved.

In proposing modifications to Ala Moana Boulevard, Ward Avenue, Piikoi and Pensacola Streets, the major objective is to improve pedestrian crossings and to change these roads from pedestrian barriers to pedestrian "bridges." In each case, the proposal involves installing a center median landscaped with canopy trees, such as exists on Ala Moana Boulevard Diamond Head of Ward Avenue. The center median provides a safe refuge, enabling pedestrians to cross a wide road safely in two stages. In addition, the center median provides separation between opposing streams of traffic. Finally, a planted center median affords the road a sense of ceremony and importance.

The proposal for Ala Moana Boulevard retains six through lanes and a left turn lane. The plan also calls for a 20-foot-wide pedestrian realm on either side. A 10-foot-wide planter strip next to the curb would provide a good buffer for pedestrians. Improving pedestrian access across Ala Moana Boulevard is essential in drawing the Mauka and Makai Areas together and in making the Makai Area parks accessible to an increasing Mauka Area residential population.

\* If such would/could impact development of a landowner's lands, please clarify how the above is contemplated to be achieved, such as through incentive or other types programs.

The proposal for Ward Avenue retains four through lanes and adds an eight-foot-wide center median also by reducing lane widths, in this case to 10 feet. Smaller lane widths are appropriate for low-speed urban streets. Ward Avenue would have a 15-foot-wide pedestrian realm. Ward Avenue serves as both a prime gateway to Kakaako and as the spine of the Mauka and Makai Areas. For this reason, it should be revamped to stand out as a ceremonial street.

The proposals for Piikoi and Pensacola Streets involve returning these roads to two-way traffic up to King Street. In addition to slowing traffic, the two-way design would improve access to lots fronting the street. Each would have two lanes traveling in the former one-way direction and one lane traveling in the opposite direction. To fulfill the Honolulu Bicycle Master Plan, bike lanes would be provided in both directions on Piikoi Street, which has a wider curb-to-curb dimension. Both streets would have center medians, providing shorter crossings for pedestrians.

Table 7-1. Kakaako Mauka Area Roads

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Name	Road Type	Special Feature	ROW
King	Avenue	One-way, 5 travel lanes (no change)	90'
Kapiolani Boulevard	Boulevard	6 travel lanes, undivided (no change)	100'
Queen	Street	4 travel lanes	Varies 50'-60'
Queen Extension/ Waimanu	Street		100
Halekauwila	Street	High-Capacity Transit route	60'
Pohukaina	Promenade Street	Connect to Auahi at Ward	60'
Auahi (Ward to Queen Lane)	Promenade Street	4 travel lanes, parking. Connect to Pohukaina at Ward. Future option: 4 travel lanes, with planted median.	60'
Auahi (Ahui Ext. to South)	Promenade Street		60'
Ala Moana Boulevard	Promenade Boulevard	6 travel lanes, left-turn storage, median	100'
Waimanu (Dreier to Kamakee)	Service Street		40'
Kawaihahao	Street		50'
Ilaniwai	Service Street		40'
Kona	Service Street		40'
Hopaka	Alley		19'
Punchbowl	Promenade Avenue	One-way makai (no change)	70'
South	Avenue	One-way mauka (no change)	Varies 66'-80'
Cooke	Promenade Street	4 travel lanes	60'
Ward Avenue	Promenade Avenue	4 travel lanes, median	80'
Kamakee	Promenade Street	4 travel lanes (no change)	76'
Piikoi	Avenue	Convert to two-way travel, with planted median and bicycle lanes	80'
Pensacola	Avenue	Convert to two-way travel, with planted median	76'
Mission Lane	Service Street		40'
Quinn Lane	Alley		19'

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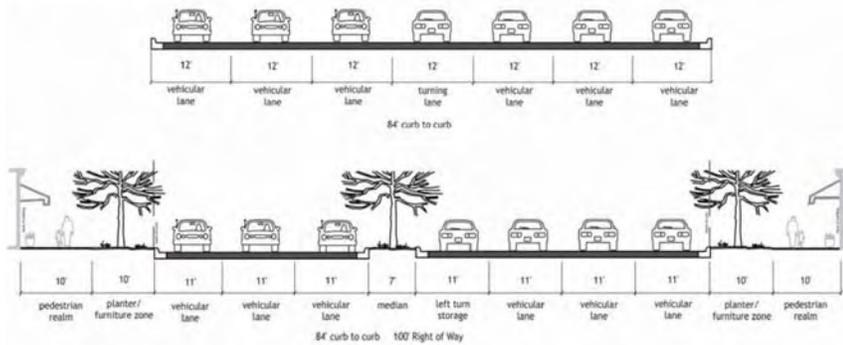
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Reed Lane	Alley		19'
Keawe	Street		50'
Coral	Service Street		40'
Emily	Service Street		40'
Curtis	Service Street		40'
Archer Lane	Alley		19'
Clayton/ Chapin	Alley		19'
Dreier	Service Street		40'
Koula (Ala Moana to Halekauwila)	Service Street	Possible street closure.	40'
Ahui & Ahui Extension to Ala Moana	Street		50'
Kamani	Street	Possible street closure.	40'
Cummins	Street		50'
Cummins Extension (Queen to Ala Moana)	Street		50'
Queen Lane	Street		50'
Alohi	Street		50'
Elm	Street		50'
Laula	Street		50'
Rycroft	Street		50'
Hoolai	Street		50'
Kamaile	Street		50'

Comment [m3]:

Comment [m4]:

**Boulevard:  
Ala Moana Boulevard -**



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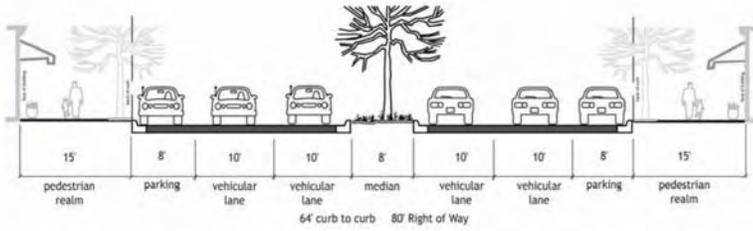
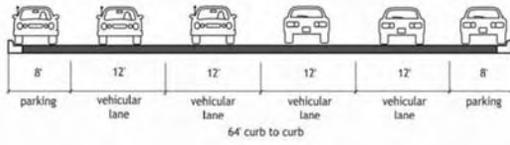
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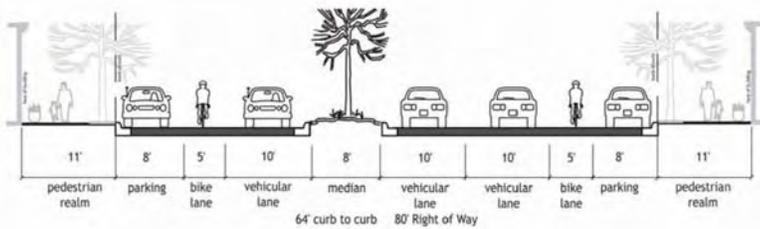
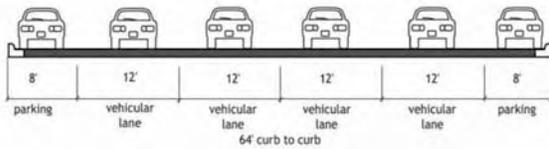
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**Boulevard:**  
**Ala Moana Boulevard -**  
 MAUKA AVENUE



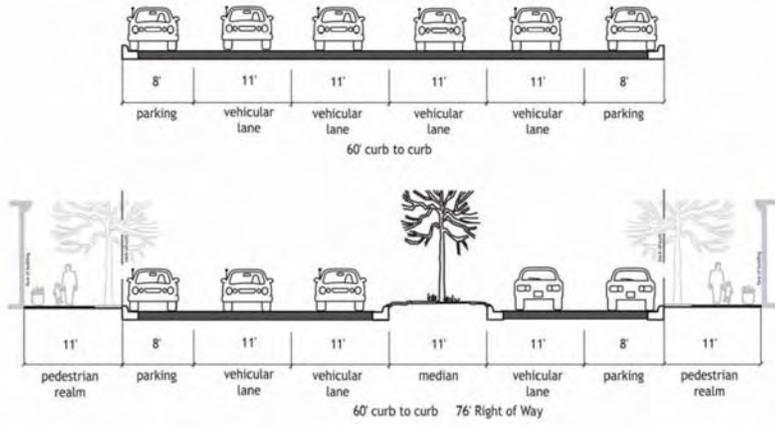
**MAUKA AVENUE**



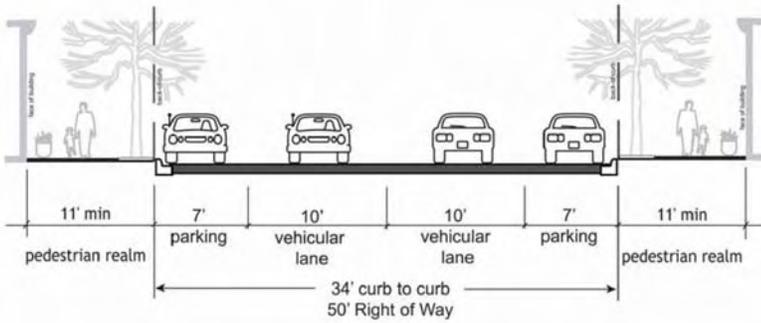
**Avenue:**  
**Ward Avenue**

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**Pensacola Street**



**Street**



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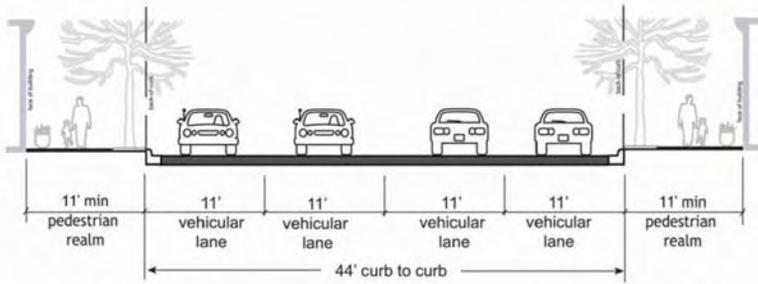
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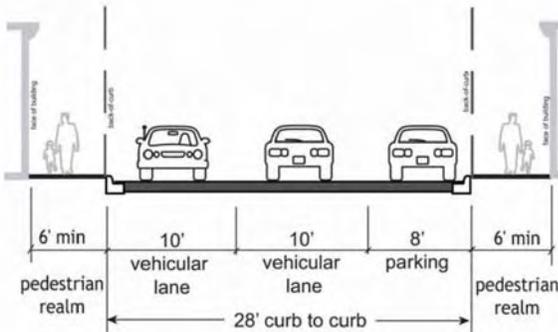
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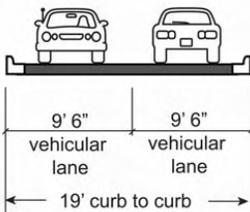
Street w/ 4 Lanes



Service Street



Alley



7.3.5 Pedestrian Facilities

The term “pedestrian realm” is used to describe in detail the layout of what is commonly referred to as the “sidewalk area.” The pedestrian realm consists of a tree/furniture zone next to the curb, a clear walk zone, and “shy space” at the face of the adjacent building. The Roadway Plan includes a range of modest proposals to improve the pedestrian realm and make the Mauka Area a premier community for walking. Improving the pedestrian realm entails the following elements:

- 

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Comment [m6]:

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Developing a fine-grained network of walkable (Pedestrian Tolerant or Supportive) streets and pathways.

Comment [m7]:

Buffering pedestrians from traffic by placing planter/furniture zones next to the curb and by providing on-street parking.

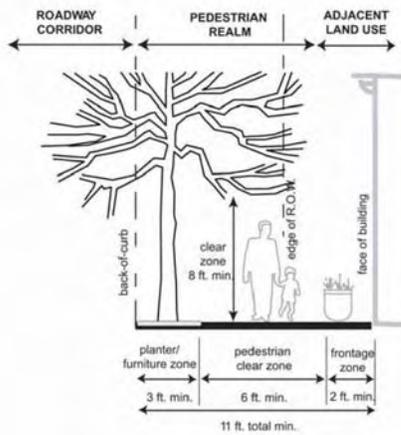
Creating consistent street walls of low-rise building elements to frame the public street space at a human scale and to provide visual interest.

Comment [m8]:

Developing key streets as Pedestrian Supportive environments by widening the pedestrian realm; providing street trees and, where possible, on-street parking; mandating active uses in streetfront buildings; and minimizing, if not eliminating, driveways and curb cuts.

Please explain how goals such as “widening the pedestrian realm” are contemplated to be achieved if they would go through private lands? We recommend, of course, a currency of incentives to help developers and landowners overcome costs of some items like this.

PEDESTRIAN REALM: STANDARD



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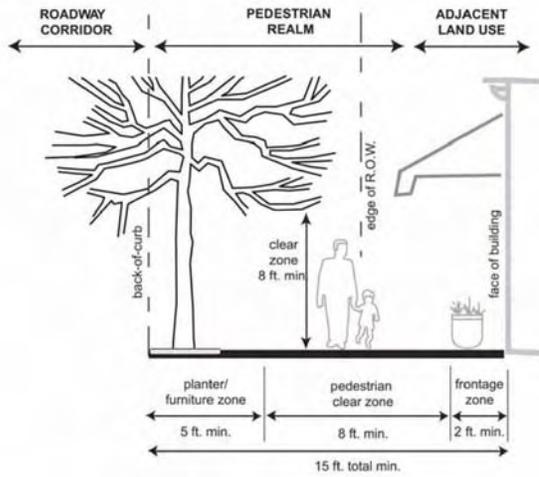
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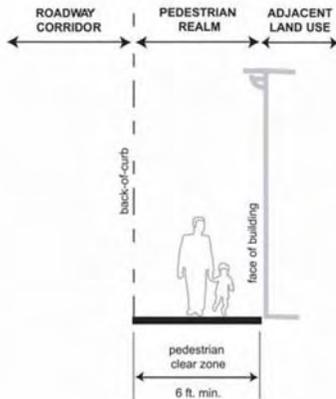
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PEDESTRIAN REALM: PROMENADE



PEDESTRIAN REALM: SERVICE STREET



7.3.6 Bicycle Facilities

The Plan includes one key new bicycle corridor on Piikoi Street, providing an important mauka-makai connection. Roads striped for four travel lanes, such as Cooke Street, could in the future be restriped to accommodate a parking lane and a bicycle lane. Similar opportunities exist on Punchbowl Street.

7.3.7 Parking and Loading

A key impetus for the Mauka Area Plan is to make Kakaako’s neighborhoods and streets more pedestrian-friendly and transit-oriented. To accomplish this goal, consideration must be given to parking and loading needs in a manner that does not overwhelm the pedestrian realm. Following are the revised plan’s strategies:

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\* Especially given the desire to not have excessive parking, please describe or guide how in the MA Rules street parking spaces should be counted to help satisfy nearby land use parking requirements.  
\* Please elaborate on how a potential or planned salable parking credits program might work. This would be, for example, where land users, such as a retailer, might buy parking credits to satisfy their parking requirements. They could then direct their customers to park in those stalls for which they have such credits. Calculating the minimum and maximum terms for such a credit program would be the work of parking experts.

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**Provide public parking facilities in Central Kakaako.** In Central Kakaako, many service businesses generate a greater demand for parking and loading spaces than the small lots on which they are located can accommodate.

\* Clarify that parking which may be provided or available in areas near Central Kakaako should not be penalized for having parking over their minimal on-site demand requirements.

**Encourage shared-use parking facilities.** Most new parking facilities will be built by the private sector as part of redevelopment of larger parcels. Mixed-use development increases the potential for share use of parking. For example, peak parking demand for office use occurs at different times from peak periods for dining and entertainment uses.

Please include tables showing proposed shared use parking coefficient effects.

**Reduce the frequency and width of driveway curb cuts.** Each curb cut for a driveway eliminates at least one potential on-street parking or loading space. The cumulative impact of this is particularly evident in small lot neighborhoods such as Central Kakaako and Sheridan, where frequent or continuous driveways preclude on-street parking and loading along long stretches of street frontage.

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**Provide on-street parking on pedestrian-oriented streets and loading on service streets.** On-street parking is an asset to a pedestrian-oriented street. A pedestrian street is typically lined with buildings that have active uses and/or building entries from the sidewalk, so street-front parking is a convenience. In addition, the parking lane provides a buffer between the sidewalk and the street's travel lane. To optimize these benefits, driveways should be prohibited or strongly discouraged on pedestrian streets. Loading spaces, on the other hand, should be on designated service streets, where driveways to parking garages and loading docks and service entries are also located.

Please flesh this out further to show we've addressed issues of increased uses of streets for loading and service purposes when driveways might have been the better path. E.g., include analysis showing that at certain square footages of use driveways are warranted. E.g., a small lot use may not warrant a driveway whereas a large lot use may warrant a curb cut. Please include any analysis showing that the impact on desirability of attracting commercial tenants has been addressed if driveways are taken away. This may not affect most tenants but it would be good to know which types of people it will affect.

**Count parking in excess of off-street parking requirements as floor area.** Many Kakaako development projects provide parking well in excess of minimum requirements for market reasons. In a pedestrian- and transit-oriented district such as Kakaako, the Mauka Plan shall discourage excessive parking supply by creating a market disincentive. For this reason, the revised plan proposes that absent a reasonable justification for an excess, to have parking that exceeds the required minimum number of spaces by 20% or more count as floor area.

\* Please include a table showing strong examples of current and recent overbuilding and how many unneeded spaces were built along with explanations for the overbuild.

No disincentive shall be applied whatsoever where the developer or landowner contractually built such

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“parking in excess” in reliance on a written HCDA agreement to provide such parking contemplating public use of such excess spaces.

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**Discourage long-term use of land for large, surface parking lots.** In a redevelopment district with rising land values, most property owners have an economic incentive to make higher use of their property. Thus, a large vacant property is usually in a temporary holding pattern until market conditions are conducive to redevelopment. During this interim period, it is reasonable to make use of the property for off-street parking because it provides the owner with an economic return while meeting a demand for parking generated by nearby uses. Nevertheless, if this use remains over a period of years, the surface parking becomes a visual blight creates an activity vacuum along the street-front, which tends to discourage investment in redeveloping neighboring properties. To prevent this from happening, permits for surface parking lots with a capacity or area above a certain threshold should be granted for only a limited amount of time (for example, a maximum of 5 years). After that period, the permit may be renewed only if additional landscaping and some active street-front use is provided on the site.

We recommend a tailored approach which contemplates

- Grandfathering in existing parking formats
- when existing ground leases with their renewal options expire
- when existing space leases with their renewal options expire
- market conditions in terms of their support for feasibly converting or upgrading a land use
- changing parking demand needs when feasible land use changes are being contemplated
- adjusting the above example period for a full real estate cycle
- unique circumstances making it difficult to make such changes—or even non unique circumstances, such as public resistance

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## **8.0 Reserved Housing**

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This section pertains to the methods by which the Hawaii Community Development Authority (“HCDA”) will fulfill the legislative mandate in HRS 206E-33(8) relating to Housing, which states:

*“Residential development shall ensure a mixture of densities, building types, and configuration in accordance with appropriate urban design guidelines; integration both vertically and horizontally of residents of varying incomes, ages, and family groups; and an increased supply of housing for residents of low- or moderate-income shall be required as a condition of redevelopment in residential use. Residential development shall provide necessary community facilities, such as open space, parks, community meeting places, child care centers, and other services, within and adjacent to residential development.”*

The legislature also delegated to the HCDA the necessary powers to develop housing. However, there are other state agencies such as the Hawaii Housing Finance & Development Corporation (“HHFDC”) that specialize in affordable housing development and are better qualified for this task. Therefore the HCDA’s housing program will be more effective if it is geared toward a specific housing product type that targets the workforce or the gap-group instead of the entire affordable spectrum. With this in mind, HCDA’s focus will be to stimulate the production of housing units for workforce buyers from 100% up to 140% of Area Median Income (“AMI”), by ensuring that a portion of residential projects are set aside or “reserved” for this income group. The HCDA will refer to these as “reserved housing” (“RH”) units in order to differentiate these from “affordable” units produced by other government agencies, which are usually priced at lower income groups<sup>2</sup>. The HCDA will refer all other development opportunities such as land acquisition opportunities and development projects to the appropriate State agency. In addition, the HCDA will continue to consider any reasonable RH proposal.

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**\*\*\* Please include consideration of the following:**

- number of people in various RH housing income levels
- characteristics/demographics of potential RH qualifying people
- considering where RH could do the most good for the most people
- e.g., how many of the RH type people are single parents or even two parent families that currently live with their parents or extended families? If they qualified for RH would they conceivably would move from their families? Would it be better if RH requirements could be met in some of these areas of Honolulu where there is a higher number of families per household?
  - Families, nuclear and extended, can be invaluable support systems.
  - Some families may be fine moving away from their extended families so balance may be the key.
- Of course, there will be people who would be in an ideal position for on-site RH
- The SEISPN observes that the resident population in this area is “slightly older than the County” and that “household size is generally smaller than the County.” Page 3-7, Para. 3.4.1
  - Due to high construction costs and AMI income levels not sufficient in large numbers to clear this hurdle, it is likely that most move-ins to the area will be of a similar profile.
  - Furthermore, careful study should consider the value of critical mass in addressing inclusionary RH requirements. E.g., if inclusionary housing may result in only a few families living in a building, it should be considered whether the underlying RH goals may best be met in other ways than inclusionary requirements which may result in an unintended consequence of making it harder for some people to form social bonds within the area. Consideration to where schools and parks are should be considered. If RH family needs and children’s safety could best be met by letting such families live near a school and park, it could be worth allowing, even if it means the RH family is not in the 20% building allocation requirement.
  - Note that due to income, cost and family considerations, there may also be a larger number of active adult households in the market for such housing. This may mean fewer young families which may make it harder to achieve critical mass for young families in terms of school support, friendships and other types of socially helpful relationships. Care and flexibility in the rules should be maintained to best help these different groups succeed in the area.

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\* Please include relevant median income (e.g., AMI) tables and cites so that people can follow the data especially for planning in this area. This would include the types of breakouts being considered (e.g., household of 2, household of 3, w/info’ on most likely families to move here). Include a note suggesting developers look to the cited source—or to check w/the entitling agency for current sources and data.

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\* Please include a description of a mechanism that could allow landowners rights to recover lands if landowners have had to take lower than market values on their lands due to RH restrictions on pricing. In such a case perhaps the landowner should have an option to buy back the residential unit at some fixed marked up price or to otherwise share in any upside. Given that this may be some of the more expensive land in Honolulu, this aspect should receive thoughtful analysis.

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**8.1 Inclusionary Housing**

Inclusionary housing is a flexible strategy with a proven track record of meeting a community’s affordable housing needs. Such a policy has been most effective in areas such as Kakaako that are experiencing growth, since affordable units are only generated if private residential development is occurring in the community. However, some pricing restraint is necessary to avoid a wide disparity in quality and other potential conflicts between the market and RH units.

In the past, zoning requirements have been an effective exclusionary tool. Intentional or not, zoning's effect has often segregated communities by income and race simply by influencing pricing. Many jurisdictions typically use zoning to require minimum lot sizes, minimum home sizes and restrictions that make it difficult, if not impossible, to build affordable housing in these communities. The result is a pattern of enclaves that are priced too high for low-to-moderate-income families. As a consequence, these low-to-moderate-income families are cut off from better schools, emerging job centers and opportunity networks, and relegated to lengthy commutes to

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work, school and social contact.

<sup>1</sup> All references to income standards are based on US Department of Housing & Urban Development (“HUD”) data.  
<sup>2</sup> “Reserved housing” is HCDA’s term. The term “affordable housing” often focuses on lower income level targets. Also reserved housing promotes the policy of inclusion.

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Inclusionary housing requirements mitigate this disparity by using pricing and selective sales as a tool for promoting mixed-income communities. Inclusionary housing programs also allow innovative communities to create housing for their workforce, and enable families of moderate means to benefit from urban redevelopment.

Mixed income communities broaden access to well-funded schools, strong municipal services and emerging job centers. Mixed income communities also provide openings through which lower-wage earning families can buy homes in appreciating housing markets, accumulate wealth, and share a part of the American dream.

The following section will describe the details for meeting the legislative mandate in HRS 206E-33(8) and will explain the key parameters that apply to reserved housing.

### 8.2 Reserved Housing Program

Currently Developers of residential projects that take advantage of the HCDA’s Planned Development (“PD”) benefits must make 20% of the residential units of those projects available either for purchase or for rent by workforce households with income from 80% to 140% of AMI. Conditions for reserved housing are enforced through deed covenants in the initial purchase documents.

The revised Reserved Housing program is proposing that all new residential projects within the KCCD on lots of 20,000 square feet or more contribute to the development of RH either by producing the units or by paying fees to construct these units.

In return for providing reserved housing, developers could receive non-monetary off-sets in the form of density or height bonuses, modifications to rules, fee waivers and expedited permits. By linking the production of reserved housing to private development projects in the Kakaako Community Development District (“KCDD”), the program can more efficiently expand the supply of moderately priced housing while dispersing these units throughout the KCDD to broaden housing opportunity and foster mixed-income communities.

The following sections describe the various features of the proposed Reserved Housing (RH) program.

### 8.3 Inclusionary Preference

An objective for the HCDA is to encourage development of “workforce” or “gap group” housing. Therefore, producing as many residential units as possible that qualify as workforce or gap-group housing will set the tone for any HCDA housing program. These residential units may most easily and appropriately be produced through “inclusionary” means, integrated well to avoid obvious segregation and targeted to the low-to-moderate price range to mitigate quality differences between the market and below-market priced units. Nevertheless, if a developer finds it necessary to produce the RH units offsite, such a request will be evaluated on a project by project basis and could receive credits under HCDA’s housing program, albeit at a lower credit value than onsite units.

It is understood that workforce and affordable housing dwellers may have an incentive to save funds where possible. One way they could reduce their living costs would be if they lived closer to planned transit sites and lines. With this regard, developers placing RH housing within a five to ten minute walk of such lines, whether inclusionary or not, shall receive a bonus or incentive credit for such placement in the amount of 125% for a planned ten minute walk and 150% for a planned five minute walk.

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### 8.4 Reservation

The reserved housing program will require that 20% of the residential floor area be reserved and developed for buyers or renters with qualifying incomes not more than 140% of AMI together with other restrictions. Prices and rents for these reserved units, together with qualifications for the buyers and renters will be established

accordingly.

### 8.5 Preference for Units vs. In-Lieu Fees

Generally, the HCDA will be flexible about the development of reserved units, provided that the RH is completed at the same time as the main project and meets the agreed-upon conditions. In the rare project in which there is a compelling reason why RH units cannot be included or developed off site, HCDA may consider the option of an “in-lieu” fee. However, in-lieu fees place the burden of developing RH units on HCDA. Therefore, HCDA’s preference will be that developers construct the RH units themselves rather than allow payment of “in-lieu” fees. The HCDA will discourage the payment of in-lieu fees, except to resolve a case of fractional units. If in-lieu fees become part of a reserved housing settlement, they will be set at the prevailing cost associated with producing the required reserved housing units. The in-lieu fee will be deposited in HCDA Reserved Housing Sub-Account and could be used to finance government built, below 100% AML, housing projects.

### 8.6 Preference for Onsite vs. Offsite Reserved Housing

Building inclusionary units within the larger residential development is the ideal way to promote the RH concept since it leads to greater economic and social integration as well as helps to connect the workforce communities to regional opportunity. Furthermore, the inclusionary concept calls for exterior compatibility between reserved and market-rate units so that families of different means can purchase homes externally indistinguishable from the rest of the development, which helps in reducing the stigma that is often associated with lower priced housing in general.

Although HCDA’s charter allows the provision of offsite RH, the HCDA prefers onsite development and will be the final determinant on allowing any offsite RH proposal to fulfill the requirement. In order to foster mixed income communities, developers are strongly encouraged to produce the RH units within the larger development unless there are overriding obstacles.

HRS 206E-4(18) states that HCDA may:

“Allow satisfaction of any affordable housing requirements imposed by the authority upon any proposed development projects through the construction of reserved housing, defined in section 206E-101, by a person on land located outside the geographic boundaries of the authority’s jurisdiction. Such substituted housing shall be located on the same island as the development project and shall be substantially equal in value to the required reserved housing units that were to be developed on site. The authority shall establish the following priority in the development of reserved housing:

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- (1) Within the community development district;
- (2) Within areas immediately surrounding the community development district;
- (3) Areas within the central urban core;
- (4) In outlying areas within the same island as the development project.

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The Hawaii Community Development Authority shall adopt rules relating to the approval of reserved housing that are developed outside of a community development district. The rules shall include, but are not limited to, the establishment of guidelines to ensure compliance with the above priorities.”

Since HCDA is willing to consider any reasonable offsite RH proposal, it will give such proposals serious consideration. Such proposals could involve myriad variations and therefore specific rules cannot be established in advance. Proposals must be evaluated on a project by project basis. If offsite RH proposals are considered, HCDA may considering imposing additional requirements than those typically imposed on onsite or inclusionary RH. Such requirements may include lesser credits for offsite RH.

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### 8.7 Cost Offsets

Effective RH programs usually offer developers a range of cost offsets to achieve a double bottom line: reserved housing for residents and a reasonable overall return. Profitability of a residential

project is important to ensure that developers will actually build in Kakaako and therefore should be factored into any win-win RH formula, especially since the development of any reserved housing depends on the development of housing in general.

Examples of cost-offsets for providing RH could include the following benefits or combination of benefits for discussion with HCDA:

Type of Cost Offsets	What It Does and Why It Helps	Example
<b>Density or Height</b> <u>bonus or incentive</u>	Allows developers to build at a greater density than typically permitted. This allows developers to build the full complement of market-rate units without having to acquire more land.	Most jurisdictions offer density bonuses. Typically they are roughly equivalent to the required set-aside percentage for RH. For example, there will be a floor area <u>bonus or incentive</u> allowed equal to the 20% residential floor area set aside for RH. This <u>bonus or incentive</u> currently ranges from 1.0 to 2.0 additional FAR on a sliding scale from 20,000 to 80,000 square feet buildable project area.
<b>Unit size reduction and Finish Cost Adjustment</b>	To reduce costs, developers would be allowed to build smaller or differently configured reserved units than market rate units.	Currently allow reasonable unit size reduction and finish adjustments. Reserved units should be no smaller than stated minimums.
<b>Reduced Parking Requirements</b>	Allow parking space efficiency in higher density developments with underground or structure parking by reducing the number or size of spaces, or allowing tandem or shared parking.	Reduce required parking for RH to one stall/unit.
<b>Design Flexibility</b>	Grant flexibility in design such as reduced setbacks from the street or property line, or waive minimum lot size requirement.	Permit reasonable modifications of road width, lot coverage, relax setbacks and minimum lot size.
<b>Fee waivers, reductions or deferrals</b>	Waive on a pro-rata basis, Improvement District and Public Facilities assessments. Allow fees to be paid upon receipt of certificate of occupancy rather than upon application for a building permit.	Waive fees attributable to reserved housing units. Allow deferral of all fees due until certificate of occupancy.
<b>Fast track permitting</b>	Streamlines the permitting process for projects containing reserved housing, reduce carrying costs (e.g., interest payments on predevelopment loans and other land and property taxes).	Expedite the permitting of projects including reserved housing to include automatic approval after a stated period.

Please flesh this out further. To not count FA against a FAR ceiling may not be enough to overcome the cost impact of the RH program. E.g., what it implies is that for every RH unit you build you can build one market unit. The problem is that a developer may not be able to recover from the loss by just building one market unit. It may take a multiple of market units to compensate for the loss generated by each RH home.

**Table 8-1: Examples of cost offsets for providing RH**

**8.8 Compatibility in Outward Appearance**

Developers should be required to construct reserved units that are similar or compatible in outward appearance to market rate units. This requirement will provide cohesiveness in the physical appearance of a neighborhood helping to overcome negative perceptions of what constitutes "affordable" housing. Developers generally have a vested interest in adhering to this requirement since units that are disparate in outward appearance can lower the market value of their development.

**8.9 Maintaining Affordability**

Reserved housing units should remain affordable as long as reasonable long term constraint in sales of RH for future generations and are needed to expand the inventory of RH units. Long term affordability can be achieved by various means. The typical tools used by HCDA are equity sharing upon resale, and buy-back option in favor

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of HCDA. These features will be incorporated as covenants in the deed for the unit.

Programs with long affordability terms can call for a sharing of equity upon resale which while providing the incentive of the creation of wealth and to avoid making RH ownership financially less attractive for speculators. These terms allow the owner to build some equity while effectively eliminating profiteering.

For units purchased under the buy-back provision triggered by the homeowners decision to sell the unit prior to the expiration of the buy-back term, the purchase price should be set as low as possible to the original reserved purchase price so the unit can be resold to another qualified buyer. Therefore the buy-back price should be based on the original reserved purchase price inflated only by an appropriate inflationary index and owner paid unit improvements. This allows for the owner to extract some equity while keeping the unit still affordable.

On reserved units for sale, HCDA proposes to require perpetual equity sharing with an allowance for the build-up of equity for the homeowner from the point of purchase according to the homeowner’s percentage share of ownership. The remaining portion of the equity would revert to the HCDA Reserved Housing Sub-Account upon resale.

The equity sharing feature suggests that highest possible market sale price would be desirable. The proportion of the equity percentage will be established by the owner’s purchase payment divided by the appraised market value for that unit at the point of purchase. For example, a qualified homeowner buys a unit appraised at the time of initial sale at \$500,000. However, the homeowner only pays a net \$400,000 because of RH price restrictions. The homeowner then sells the same unit 10 years later for \$600,000 in net proceeds. The homeowner would keep 80% (reserved price divided by appraised market value at the time of initial sale=80%) of the net proceeds (or \$480,000) at closing and HCDA will receive 20% (or \$120,000) of the net proceeds (all net of taxes, closing and financing costs and fees).

### 8.10 Proposed Reserved Housing (“RH”) Program Checklist

A generalized overview of how the Reserved Housing Program might work is provided only as an example. The specifics of the project will change the calculations and conditions and will cause each project to have unique parameters.

If the project includes residential use on 20,000 square feet or more of development lot area, it must follow:

• The project must set aside 20% of the residential floor area and develop this for reserved housing. The units shall be sold or rented by the developer as reserved housing.

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• The reserved housing characteristics shall be negotiated with the HCDA to determine the unit count, sizes and types and initially priced for sale or rent to a buyer or a tenant with income from 100% up to 140% of Area Median Income (“AMI”) according to family size.

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• The developer must sell the units, at prices at or below 140% of AMI to qualified buyers with deeded covenants in favor of HCDA that include a 10 year buy-back and perpetual equity sharing provision.

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• The buy-back price shall be based on original purchase prices, inflated from time to time by an appropriate index and owner paid unit improvements.

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• An equity sharing percentage shall be set at the time of each purchase by a reserved buyer. HCDA’s share of the equity will be transferred to the HCDA Reserved Housing Sub-Account

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• The developer may also choose to develop rental units, in which case the RH units shall be rented to tenants qualified at 140% of AMI. Such rental units will remain as RH units for a period of 15 years. The developer will be responsible for managing such units.

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• Exemptions from “gross floor area” include licensed life care facilities.

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## 9.0 Historic and Cultural Resource Plan

The redevelopment of the Mauka Area is guided by development policies found in Chapter 206E, HRS. The Legislature has declared that sites of historical or cultural significance within the Mauka Area shall be preserved. Therefore, the preservation of such resources shall be an integral part of this plan.

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Most of what we know today as Hawaii's urban form dates from the Post World War II era when Hawaii's rate of growth and development rapidly increased. For this reason man-made resources which predate this period are reminders of Hawaii's past. Hawaii is unique in that the historical entry point of its various cultures is fairly well-defined. One can trace the establishment, then flourishing of the cultures through their diverse art forms and architecture. The end product of this evolutionary process is an integrated culture founded upon the blending and merging of its diverse backgrounds. The preservation of significant historic and cultural sites will provide us with concrete evidence of our cultural past and an appreciation of the origin of the cultures that have contributed to the development and uniqueness of Hawaii today.

### 9.1 Historic and Cultural Resources Proposals

The Mauka Area is one of the early urbanized areas in Honolulu and, fortunately, still retains many sites of significance (Figure 8-1). These sites should be preserved to provide present and future generations with an understanding of Hawaii's history and uniqueness.

The preservation, restoration and use of historic sites are very important from an economic standpoint. The retention of historic and cultural sites promotes the uniqueness of Hawaii's history. Historic and unique buildings in the Mauka Area which are renovated and made economically productive can contribute to the continuing distinctiveness and uniqueness of the Mauka Area, and serve as attractions to residents and visitors in Honolulu.

The process of identifying sites recommended for preservation, protection, restoration, rehabilitation, and/or reconstruction involved the following steps.

An inventory of the Mauka Area's historic sites and buildings as well as culturally significant facilities, settings and locations was performed. In evaluating sites and selecting those meriting protection, criteria used by the Hawaii Historic Places Review Board were considered. The Mauka Area's historic and cultural resources were then reviewed as to their relationship and significance to the Mauka Area's past.

The following definitions will facilitate understanding of the actions recommended in this plan.

**PRESERVATION** -- keeping a particular property in its present condition. Such property may already be in a restored or rehabilitated condition.

**REHABILITATION** -- returning a property to a useful state, thus allowing it to be used while preserving those portions or features considered historically, architecturally, and/or culturally significant.

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RESTORATION -- recovering accurately the authentic form and details of a property or a structure and its setting, usually by renovating a later work, or replacing missing earlier work.

**9.2 Historic Resources**

The following are sites selected for protection and the action recommended for each site:

HISTORIC SITE PROPOSED ACTION

- Kawaiahao Church and Grounds Preservation
- Mission Houses Preservation
- Old Kakaako Fire Station Rehabilitation
- Mother Waldron Playground Preservation
- McKinley High School (portion) Rehabilitation
- Makiki Christian Church Preservation
- Yee/Kobayashi Store Restoration
- Royal Brewery Building Preservation

**9.3 Cultural Resources**

The NBC should be protected due to its cultural and aesthetic values.

Other resources within the area considered to be of cultural and historic value may not be on the plan's preservation list. In evaluating sites, major emphasis was placed on a site's ability to be economically self-sustaining and thus contribute to the renewed community.

With respect to the historic and cultural sites and buildings on the Authority's list which are privately owned, additional assistance to the owners shall be considered. The Authority shall review and consider the possibility of providing tax incentives, governmental grants-in-aid, and other financial and technical assistance to such owners. The Authority may propose amendments to existing laws and rules to implement these concerns.

Rules shall be adopted to establish procedure by which other sites of historical and cultural significance within the Mauka Area may be identified and added to the Authority's preservation list.

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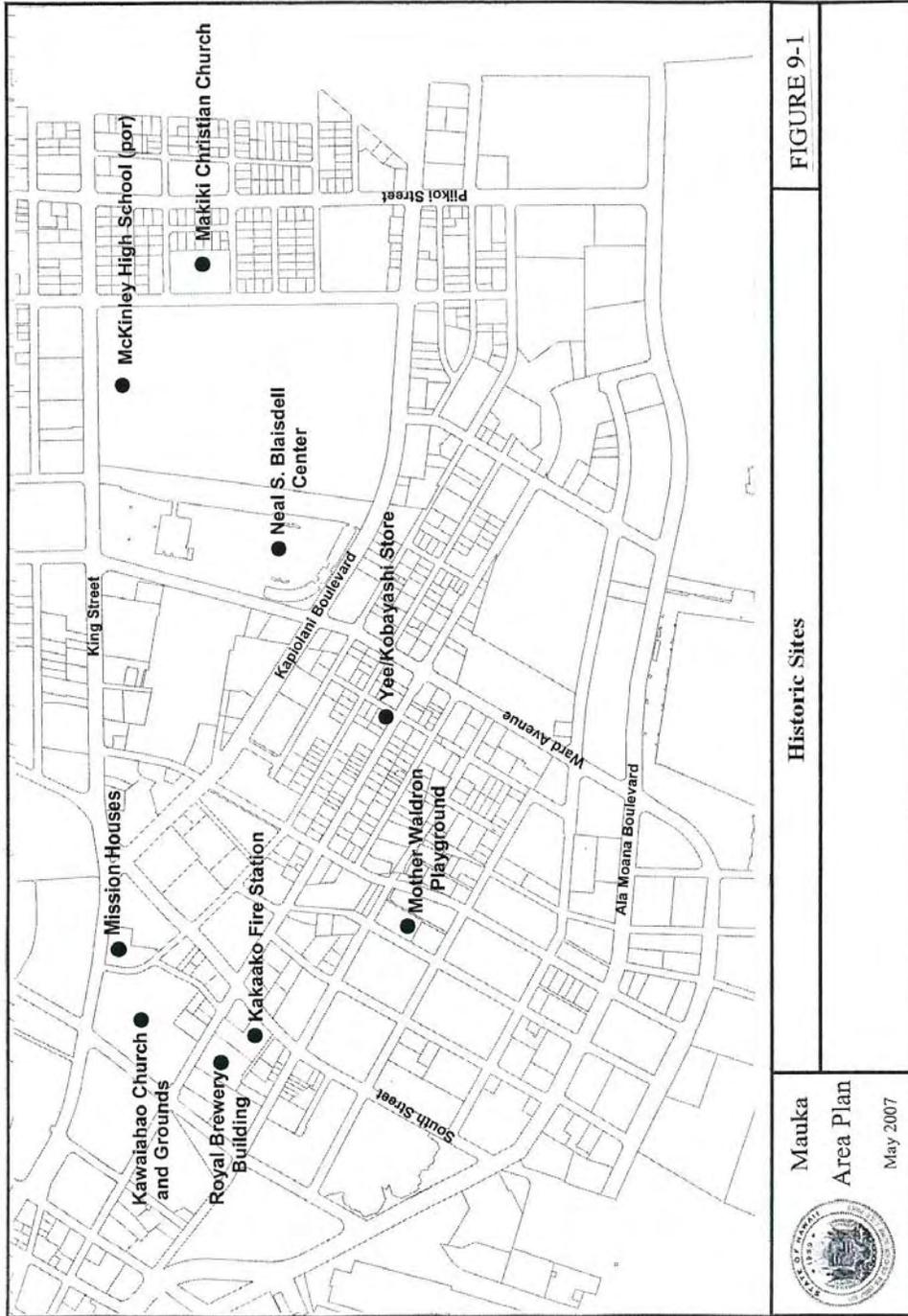


FIGURE 9-1

Historic Sites

Mauka Area Plan  
May 2007



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## 10.0 Social and Safety Plan

Chapter 206E, HRS, directs the Authority to create in the Mauka Area a community which serves the highest needs and aspirations of Hawaii's people. Such a community must provide all of the basic needs of its residents, employees, and visitors in a safe and socially desirable environment.

### 10.1 Social Proposals

To ensure satisfaction of social needs of the Mauka Area residents, employees and visitors, it is a policy of this plan that development be designed to facilitate the safe as well as enriching social interaction of people as they conduct their business and other activities within the community. Toward this end, this plan requires well designed, sensitive, attractive and accessible open space and recreational resources, pedestrian connections to activity centers, and public facilities that encourage the positive interaction of individuals and groups.

Please define "open space" in the urban context of the MAP district.

Please elaborate on the plan to realize such items as activity centers and pedestrian connections to them (if new ones are contemplated), such as how they are to be funded, where they are to be placed, who is to build them, etc. If the HCDA wishes for the developer or landowner to help in this area, please describe the type of mechanisms that could help offset the costs and liabilities of such programs.

The social needs of the district will largely be met by the provision of housing support facilities. To ensure effectiveness in serving the needs of residents, these facilities should be efficiently operated, financially self-sufficient, and accessible to all residents. In addition, their operation should promote the well being of residents by ensuring that:

- Fees for their services are affordable
- Priority be given to serving the residents and employees within the Mauka Area
- Services are competently administered
- Public funding assistance is secured for services to low-income and needy elderly households

Furthermore, efforts shall be made to provide appropriate and progressive child care and gerontology programs. To the extent possible, joint elderly-child care facilities shall be developed so that each group may benefit from its relationship with the other.

We recommend that if developers and landowners are asked to contribute in this aspect that no construction preventing or dampening conditions of approval be allowed to try to bring about the realization of these facilities. As well-meaning and as good as the provisions are, we recommend the HCDA consider that market windows are often only open for so long. If a developer has to wait too long, such delay could either severely jeopardize a project or require a project not go forward until the next real estate cycle.

### 10.2 Public Safety Proposals

The concept of mixed-use itself, as used in this plan, will help promote a safe and secure community. In a traditionally developed, largely single-use urban area like downtown Honolulu, there are periods of time in each 24-hour cycle during which there is very little human activity and interaction. This inactivity results in deserted streets which may be conducive to crime and vandalism. A mixed-use community providing a variety of business and residential activities, however, can be a place of continuing human activity thus decreasing the inactivity periods and acting as a possible deterrent to crime and vandalism.

The public sector is encouraged to exercise its police and fiscal powers to provide a safe and secure living and working environment. Areas of special concern include, among others, traffic safety and control measures, police and fire protection, acquisition and installation of private security systems or services, ensuring safe and pleasant pedestrian access to services, places of employment and recreation areas, and providing information on personal safety within developments.

Building interiors, grounds, landscaping, on-site parking and exterior common areas should be well-lighted and

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designed to minimize "pockets" in which intruders may cause harm to others. Well lighted views of open space areas, residential developments and parks from nearby activity areas and public areas should help to reduce crime and assist in the watchful care of children and the elderly.

\* We encourage the HCDA MAP and MAR to incentivize developers to employ low light pollution lighting systems. Reducing the amount of light that unnecessarily pours over into other areas will make the area more comfortable and desirable for residents and visitors while achieving security objectives. This could apply not only to public area lighting but also to such items as lanai lighting and other more private area lighting. Given that these may come at a higher cost the HCDA is encouraged to consider how it can work with developers to achieve these types of higher performance urban villages.

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Safety shall be an element of consideration in all urban design review of Planned Developments. Emphasis should be placed on assuring the installation of adequate lighting, installation of security equipment or the hiring of security personnel, and the isolation of hazardous areas and facilities from access by children or the handicapped. Landowners and residents of the Mauka Area are encouraged to form informal neighborhood watches and other associations. This could be accomplished either on a building-by-building basis with either the owners or the lessees forming such groups or on a broader scale through neighborhood boards or community associations. Organizations of this type will not only help make the Mauka Area a secure community but also foster a sense of neighborhood or community.

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## 11.0 Relocation Plan

The extent of the Mauka Area redevelopment called for by Chapter 206E, HRS, will require construction of additional public facilities and utilities as well as the redevelopment of land uses. Therefore, a certain degree of relocation, whether temporary or permanent, is necessary to facilitate such renewal.

Relocation is defined as a move, resulting from a publicly caused displacement, and re-establishment of the displaced household or business at a new location. Relocation can be a direct or indirect consequence of displacement. Displacement is any direct or indirect action, public or private, which forces households or businesses to move as a result of the acquisition, or imminence of acquisition, of real property. It may be either temporary or permanent.

In temporary displacement, the households or businesses may return to the neighborhood or the Mauka Area after revitalization is completed. Households or businesses permanently displaced, although desiring to do so, may not return to their original sites.

Displacement results from two major causes: (1) public actions such as the construction of public facilities such as streets, housing, parks and parking garages and other infrastructure systems; and (2) private actions, independently made, or induced by public planning decisions. Privately caused displacements may result from private demolition and new construction, private rehabilitation projects, and evictions due to rising market prices and rents.

Residents and businesses facing relocation may not want to move not only because of the attendant inconveniences, but also because current relocation programs often do not adequately reduce the adverse physical and social impacts and loss of revenues that accompany it.

### 11.1 Relocation Proposals

As used in this plan, relocation refers primarily to displacement resulting from government-initiated projects. Households and businesses displaced by private sector actions, however, shall receive certain public assistance services short of monetary payments.

It is the intent of the Authority to provide meaningful relocation assistance for all persons and businesses displaced due to public action. Towards this end, the Authority shall be guided by the following principles:

- To phase redevelopment to minimize disruptions.

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The Authority is encouraged to balance the risks of delaying a project and missing a real estate cycle with the potential physical and fiscal disruption levels, such as if a small business is going into its peak earnings period. Such balancing may invite a collaborative effort between relocates and critical stakeholders.

- To ensure that families and businesses are, to the extent practicable, properly relocated before permitting their displacement by new development, redevelopment, or neighborhood rehabilitation.
- To return as many persons displaced by government actions back to the Mauka Area.
- To provide opportunities for persons displaced by government action to avoid major financial loss.
- To minimize or ameliorate any serious negative impacts of displacees, such as loss of employment or business, imminent loss of shelter, and monetary losses.
- To provide counseling, information and referral services to displacees affected by private sector actions, induced or stimulated by governmental planning decisions.

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Relocation assistance includes providing financial benefits and relocation services to households and businesses displaced as a result of public acquisition of real property for public improvement or purposes. Toward this end, it is proposed that the payments provided to displaced persons reflect amounts necessary to meet reasonable relocation expenditures. Equitable relocation assistance payments to displaced persons, facilities, and businesses shall be established. Such assistance may include, but is not limited to, payments to displacees for moving costs, a dislocation allowance, replacement payments to owner-occupants who purchase, rent subsidy to owner-occupants, replacement payments to tenant-occupants who purchase or rent, and replacement housing subsidy for tenants.

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Every effort shall be made to provide displacees of households and businesses resulting from public acquisition with comparable replacement facilities at reasonable rates. Procedures shall be instituted to identify potential displacees at an early stage of redevelopment in the Mauka Area.

The Authority shall seek to establish temporary relocation facilities for displaced businesses until they can be re-established in their prior or substitute location within the Mauka Area.

In view of the complexity, scope, and time period involved in the redevelopment of the Mauka Area, the Authority shall direct and oversee all relocation services within the Mauka Area. Among the functions to be performed by the Authority's relocation assistance office are the following:

- Assistance to State and County displacing agencies in the development and implementation of relocation assistance programs for specific public improvement projects.

- Advisory services to displacees of government actions, such as information on Federal and State programs, loans, and other benefits; handling appeals; personal contact with each displaced person; and assistance in finding replacement sites and in actual relocation.

- Coordination of relocation activities with other project activities and other planned or proposed City and State agency actions within the community or nearby areas.

- Advisory services to displacees of private sector actions, or to persons or business concerns occupying property adjacent to any property acquired for public improvement and are caused substantial economic injury because of the public improvement.

The Authority shall establish rules to implement these policies.

## 12.0 Public Facilities Program

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A public facilities program ("Program") will be established to provide various public facilities for creating neighborhoods that give Mauka Area residents, employees and visitors a sense of identity and belonging. Community amenities, such as meeting areas, urban parks, community centers and convenience stores should be located where residents and people who work in the neighborhood can congregate, socialize, rest, and play in conjunction with their daily living activities.

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The public facilities dedication requirements established in the Mauka Area Rules provide the HCDA with the resources necessary to develop these facilities for the long and short terms.

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Please elaborate on these and how they may impact developers and landowners.

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We strongly encourage that things be adjusted so that parking meter and other types of fees generated within the area be contributed to and dedicated to stay within the area to help maintain the streets, sidewalks, public realm and landscaping to a high level of appearance, cleanliness, desirability and security.

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### 12.1 Overview of the Program

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Chapter 206E, HRS, mandates that "...Public facilities within the district shall be planned, located, and developed so as to support the redevelopment policies for the district..." Therefore, in the redevelopment of the Mauka Area, the full array of public facilities required to support development needs to be provided. Public facilities include streets, utility and service corridors, and utility lines sufficient to adequately service development improvements. It also includes schools, parks, parking garages, sidewalks, pedestrianways, bikeways, and other community service infrastructure normally provided by the public sector.

This section of the plan addresses public facilities and services relating to health, safety, education, and welfare of the community population. Public facilities addressed in this section include schools, day care centers, health care facilities, police and fire protection, and other services.

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### 12.2 Public Facilities Proposals

It is a policy of this plan that public facilities be located on sites which will be convenient for the people they are intended to serve and be designed to meet the needs of the population. Whenever compatible, different types of public facilities will be located in such a way as to enhance the convenience to the public and to reduce the cost of constructing such facilities. For example, community centers, day care centers, and recreation and elderly facilities can be combined with parking facilities. Similarly, services such as postal, social, clinical, and governmental functions may also be combined.

The need for public facilities is based upon population/facility requirement standards. As an example, the Program provides for the future development of day care centers in conjunction with the development of residential, commercial and industrial activities in the Mauka Area. Such day care centers will be developed by both the public and private sectors. Within mixed-use developments they may be located at the ground level or the recreational deck level where open space and recreation for children can be provided.

Current school facilities in proximity to the Mauka Area are adequate to accommodate some increase in the school age population. A new school may need to be established as the school age population increases to a level which warrants additional school facilities. Currently, the Mauka Area Plan designates a portion of the former Pohukaina School site as a future school site. The site is adjacent to the Mother Waldron Playground and is anticipated to be developed together as a park, school and community center facility that will service the entire Kakaako district. In the long term, the HCDA will coordinate educational needs of the district with the Department of Education.

Additional police and fire protection services for the projected population are not expected to be required. Additional major health care services such as hospitals and clinics are also not expected to be required. But minor health facilities such as doctors and dental offices are allowed in proximity to residents.

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### 12.3 Public Facilities Plan Provisions

In order to achieve the objectives of the public facilities section, adequate public facilities in the Mauka Area will be provided by the following means:

- Public construction of new public facilities especially in conjunction with the phasing of the District-Wide Improvement Program;
- Improvement or modification of existing public facilities to meet increased needs;
- Private development and dedication of public facilities in response to publicly provided incentives; and
- Assessment of the private sector for the costs of public facilities which benefit private sector developments.

All agencies of the State or City shall consult with the Authority at the project planning stage prior to the construction, renovation, or improvement of any public facility within the Mauka Area.

### 13.0 Infrastructure and Improvement District Program

(To be completed under Supplemental Environmental Impact Statement)

\* Please include an analysis of financing mechanisms which have been considered. Include methods that may be adopted or have been rejected, with explanations for both. Please include a review of the strengths, weaknesses, opportunities and threats of such mechanisms as Community Facilities Districts and Tax Increment Financing. For such mechanisms being considered, please elaborate on where they may be used, such as for infrastructure, for landscape maintenance, for public amenities, schools, park maintenance, etc. Please elaborate on Hawaii's unique characteristics that may make such tools helpful, if only to a limited extent, or which may render them insignificant. E.g., if the property tax rates are so low in Hawaii relative to other states using the above mechanisms, then such vehicles may contribute little—without modifications, which we would encourage HCDA to consider or to try to search for.

### 14.0 Implementation

The revised Mauka Area Plan is a long-range plan that builds on the Authority's 25-year history of development and investment in the Kakaako Community Development District. The Mauka Area Plan provides a framework for more detailed planning and investment decisions by landowners and government. While the Mauka Area Plan looks forward 20 to 30 years, actual implementation will proceed incrementally in response to economic cycles and the availability of public funding.

In general, the Mauka Area Plan anticipates redevelopment of the Mauka Area to more intensive use, as stated in the statutory policy guidance. Redevelopment has in the past brought dislocation of service businesses, and this trend is expected to continue as property values and taxes rise. The rate of the transition is unknown. The large landowners — General Growth Properties and Kamehameha Schools — are both planning for redevelopment. The owners of small properties have diverse objectives. Many wish to continue operating successful businesses in Kakaako. Implementation of the Mauka Area Plan must take into consideration the various interests of community stakeholders.

Over the long term, the Authority plays two roles in implementation. First, in collaboration with landowners and community stakeholders, the Authority will undertake detailed planning for, and development of specific projects and improvement districts. Secondly, the Authority will review proposed projects for compliance with the Mauka Area Rules. The following sections address the two

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critical roles.

#### 14.1 Mauka Area Rules and Project Review

Revision of the Mauka Area Rules will immediately follow the adoption of the revised Mauka Area Plan. The Mauka Area Rules will contain specific definitions and standards for uses and development, more detailed design guidelines for project review, and procedures for reviewing and approving projects. Key elements will be:

Further elaboration on long term direction and vision would be helpful, to extend the work already done in this area and in this document.

Definitions and standards for uses, build-to lines, building volumes and floor area, pedestrian and vehicular access, parking and loading, and accessory building components, such as signs, mechanical equipment and service areas;

Design guidelines for the treatment of building facades for Street-front Elements and Mid-Height Elements;

Standards and design guidelines for the provision of ground-level open space and arcades;

Standards, design guidelines and review criteria and procedures for Tower Elements; and

Standards and design guidelines for the review and approval of transitional uses.

The Mauka Area Rules will make some provision for modification of standards by the Director in limited circumstances. There will also be a provision for variances in cases of hardship, which will be referred to the Authority for decision, with an analysis and recommendation by the staff.

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

Linda Lingle  
Governor

Jonathan W. Y. Lai  
Chairperson

Anthony J. H. Ching  
Executive Director

Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Mike Dang  
Director of Planning & Development  
Kamehameha Schools  
567 South King Street #200  
Honolulu, Hawaii 96813

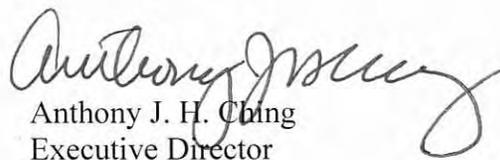
Dear Mr. Dang:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 22, 2008 offering comments on the Draft Mauka Area Plan. Your comments on the Draft Mauka Plan in track changes format will be included in the Draft Supplemental Environmental Impact Statement, where relevant.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

677 Ala Moana Boulevard  
Suite 1001  
Honolulu, Hawaii  
96813

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# SERVCO PACIFIC INC.

P.O. Box 2788 • Honolulu, Hawaii 96803-2788 • Telephone: (808) 564-1300 • Facsimile: (808) 523-3937 • www.servco.com

January 22, 2008

EDAW, Inc.  
841 Bishop Street, Suite 1910  
Honolulu, Hawaii 96813  
ATTN: Kevin Butterbaugh

Re: Comments Regarding Supplemental Environmental Impact Statement Preparation Notice  
Proposed Revisions to Kakaako Community Development District Mauka Area Plan and Rules

Dear Mr. Butterbaugh:

I am writing to EDAW, Inc (“*EDAW*”) with a copy to the Hawaii Community Development Authority (“*HCDA*”) on behalf of Servco Pacific Inc. (“*Servco*”) which is the fee simple owner of several parcels within the Kakaako Community Redevelopment District (the “*Kakaako Redevelopment District*”) and which parcels will be affected by certain of the proposed changes to the Mauka Area Plan and Rules as currently drafted and proposed by HCDA. The Servco parcels are identified as follows:

Servco Lexus:	TMK Nos. (1) 2-1-046-001 (1) 2-1-047-005 (1) 2-1-047-006 Street Address: 650 and 645 Kapiolani Boulevard
Motor Imports: Parts/Service	TMK No. (1) 2-1-031-030 Street Address: 609 South Street

Servco’s comments are both particular to its parcels and general comments regarding certain factors and considerations, including a request for further review of alternatives to better achieve the stated goals of the proposed revisions to the Mauka Area Plan and Rules.

1. Servco objects to the proposed expansion as reflected in the draft Mauka Area Plan and Rules of the Civic Center neighborhood so that it would now include the block bounded by Kapiolani, King and Cooke Streets which includes a portion of the Servco Lexus properties. Per the draft Mauka Area Plan, a building height limit of 65 feet together with special yard, landscaping and building design guidelines would be applicable to the Servco Lexus properties. Under the existing Mauka Area Plan and Rules, this height restricted area is defined as being bounded by Punchbowl, King and South Streets, and does not include the subject block. The current rules make more sense as those defined properties are in a more direct makai view plane. We do not find any common sense rationale for the expansion of the Civic Center neighborhood line and the resulting substantial reduction in the allowable height. Immediately across King Street in a mauka direction from the subject block, the City built a high rise office building which is well in excess of 65 feet. Furthermore, this change as applied to the HNA Building located on the makai side of Kapiolani from the subject block also does not make sense. We note that the 400 foot high Keola Lai condominium is being built on the block right below the HNA Parcel, and looking across the street from the subject Servco Lexus parcels you will find several high rise office, commercial and residential condominiums which are all well in excess of 65-feet.

2. The proposed changes in the draft Mauka Area Plan and Rules to the building elements allowable on a planned development parcel are troublesome and appear to have a potentially serious negative economic impact on future developments on such parcels within the Kakaako Redevelopment District. While the maximum floor area ratio is intended to remain at 3.5 with a maximum tower height of 400 feet for these types of developments, the proposal replaces the existing detailed setbacks, ground level open space, and a much larger allowable tower footprint with three allowable building elements described as follows:

Height: Three building elements:

- *Street-front Element.* Intent is to create a consistent street wall that defines the street. Proposed maximum height limit is 65-feet.
- *Mid-height Element.* The maximum height of a development is defined by view planes from shoreline parks looking toward the Koolau mountain range. Proposed maximum height ranges from 80-215 feet.
- *Tower Element.* The intent of a tower element is to provide for taller buildings and variations in the skyline while keeping a slender building profile. Proposed maximum height is to remain at 400 feet and proposed maximum footprint is reduced from 16,000 to 9,000 square feet. Heights are proposed to be reduced in sensitive key areas.

While we understand that in the view of the planners these three (3) component building elements will address what has been perceived as shortcomings under the current Mauka Area Plan and Rules we respectively disagree. We believe that the combination of new, allowable street front element coupled with the allowable mid-height element results in a trade off of substantially more mass and bulk below 215 feet in height for a smaller tower element between the heights of 215 to 400 feet. This change is not desirable in the view of Servco and we believe more serious consideration should be given to a simpler modification to the existing Mauka Area Plan and Rules which would allow for an appropriate adjustment to permit more of a street front element within the existing platform levels with a larger tower footprint rising above. This would result in developments which are esthetically more appealing, without unduly adding to the lower level mass and bulk of a project as viewed by a passerby. Also such an approach would pose much less risk of severely impacting the economic viability of projects intended to redevelop the remaining larger land parcels within the Kakaako Redevelopment District. This is especially the case when we look at the other changes being proposed to the parking requirements, the positional location of the tower elements, and the reserved housing requirements. We believe when all of these factors are considered these proposed changes do in fact adversely impact the layout, design, market unit counts, development and construction costs, and the ultimate economic feasibility of redeveloping larger land areas in the Kakaako Redevelopment District. In other words rather than encouraging and facilitating rational, balanced redevelopment of properties in the Kakaako Redevelopment District these change will act as a disincentive to such redevelopment.

3. The proposed plan and rules also proposes to have parking within a project which exceeds the required minimum number of parking stalls pursuant to the applicable building and zoning codes to count as floor area. This is apparently intended to discourage excessive parking by creating a market disincentive to counteract the fact that many Kakaako development projects provide parking in excess of the minimum code requirements for market reasons. This makes no rational sense to us. In our

experience a private developer does not develop parking stall counts in excess of the code requirements without reason given the cost. The additional parking stalls are a function of the real estate market advising developers that additional parking stalls are required to facilitate the sale of the market residential units. Why would HCDA attempt to undermine the local real estate market and potentially the profitability of a real estate development in Kakaako? Under the current Mauka Area Plan and Rules where parking areas do not count against floor area, the parking garage areas have become a place where the developer can and does provide much needed in project storage areas for the purchasers of units in the building. This change would further discourage this trend which in our view is highly desirable.

4. The proposed revisions establish a preferred mauka-makai orientation for the longer faces of the tower element. This has not worked during the last 30 years under the current Mauka Area Plan and Rules and we submit is not likely to work any better in the future. The residents of the residential components of these towers are interested first, in makai facing views (including those with a diamond head or ewa orientation) and secondarily a mauka facing view, and not downtown Honolulu or towards Makiki. That is what the real estate market has consistently shown and established over the last 30 years in Kakaako (see Waterfront Towers, Nauru Tower, Hawaiki Tower, 1133 Waimanu, Koolani, Hokua and Keola Lai). It is not reasonable to assume that will change and if imposed will in our view seriously impact the economic viability of such projects and thus redevelopment efforts in the Kakaako Redevelopment District.

5. The proposed revisions to the reserved housing requirements do not adequately address the economic viability of enabling the private sector to actually be able to construct reserved housing units. If it is not economically viable to construct the reserved housing units they will not be built which defeats the purpose in the first instance of encouraging the construction of for sale or rental, reserved housing units as opposed to the payment of cash in lieu fees by the private developer. We point out that several years ago HCDA proposed a 2-year moratorium on the reserved housing requirements in an effort to encourage and spark development within the Kakaako Redevelopment District. This action did not produce any surge in development activity in Kakaako because general economic conditions in Hawaii's real estate market did not support any development. The Mauka Area Plan and Rules should be drafted in a manner which adequately considers the economic factor and is crafted in a manner to facilitate and not dissuade a private sector developer from proceeding with a planned development, including the construction of reserved housing units. The real property in the Kakaako Redevelopment District which is utilized for reserved housing purposes costs just as much to acquire as the market development parcels. The costs of construction in Hawaii are substantially higher than comparable construction costs on most of the mainland. All of which support a conclusion that there must be a careful balance between realistic contribution to the gap-group housing being sought to be required and the economic viability of the same being provided by the private sector developer.

a. The new rule proposes a change from the current requirement of 20% of the total number of residential units in the project, to a requirement that 20% of the total floor area be devoted to reserved housing. This is a potentially substantial increase in the costs of developing reserved housing units which is not adequately offset by the proposal that possibly the floor area used for reserved housing purposes would not be counted against the total floor area the developer is allowed to build on the subject parcel. This is done in the context that the price at which the reserved housing unit(s) may be sold is still governed by median income and allowable housing costs, not land acquisition or construction costs. We are also skeptical that the increased requirement can be adequately offset by the proposal that the reserved

housing floor area not count against the overall floor area, given the limitation in tower footprint and the unchanged overall height limit of 400 feet. It seems to Servco that there has not been an adequate explanation provided as to why a change from the existing reserved housing requirements is required given its apparent general acceptance and proven economic viability within the Kakaako Redevelopment District.

b. The new rules establish a strong preference for inclusion of the reserved housing units in the same structure and/or tower that houses the market residential units. This fails to properly account for the fact that by being in the main structure the construction costs are inevitably higher on a per square foot basis and the maintenance fees to be paid by the reserve housing unit owner are substantially higher because they are required under state law to contribute their fair share to the overall costs of maintaining and operating a much more expensive building, grounds and structure. This impacts the price at which the reserved housing unit can be sold as the estimated monthly maintenance fee is part of the required housing expense to be factored into determining the allowable sales price for the reserved housing units. The consideration of other alternatives to this approach has not been adequately reviewed and discussed, and/or rejected as unworkable.

c. The new rules propose the same 10-year buy back term as contained under existing requirements, but proposed coupling that with a perpetual equity sharing provision. It seems to us that consideration should be given to the equity sharing provision ending after a term of years such as 10 years, or for a longer term of years not to exceed 15. A perpetual restriction is in our view unduly restrictive, especially in light of the fact that the buy-back option terminates after 10-years. The consideration of other alternatives is inadequate and should be further reviewed, investigated and discussed.

From our perspective it appears that the alternative of simply tweaking or modifying specific targeted portions of the existing Mauka Area Plan and Rules which would more effectively encourage the actual development and construction of reserved housing units has not been appropriately considered and discussed. We believe that certain other alternatives should also be more adequately reviewed, investigated, analyzed, and considered before embarking on the proposed changes to the reserved housing rules, including, without limitation, development of a master plan which integrates reserve housing into Kakaako by planning for limitations within certain areas rather than forced integration into a market residential development which increases costs and other disruptions, and that incentives or bonuses which could be transferrable be provided for in the areas in which reserved housing is encouraged. In other words the blending and mixing of different housing levels should be looked at on a district wide basis not just on a property to property basis.

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In conclusion it is Servco's understanding that the overriding purpose of the proposed changes to the Mauka Area Plan and Rules is to foster development of a mixed-use district within the Kakaako Community Development District where people will be able to live, work, shop and enjoy recreational activities within a neighborhood community. This is a valid and desirable purpose which Servco supports in principle. However, in the process of formulating plans for such a desired goal it is important that a realistic feasibility and economic review process be involved so as to create a plan and set of rules which encourage (do not discourage) the desired redevelopment activity and will be workable in the real world.

EDAW, Inc.  
Comments re Supplemental EIS  
January 22, 2008  
Page 5 of 5

We respectfully submit that such a review does not appear to have been undertaken as part of the review process in this instance and we believe strongly that it should occur before any final adoption of plan and rule changes.

It does not appear to Servco that the existing Mauka Area Plan and Rules need to be substantially changed. The reality is that there is now a substantial base line of information and real development experience with the current plan and rules and both government and the public sector have adapted to the Plan and the Rules as currently written which is evidenced by the redevelopment which has occurred in Kakaako over the last twenty (20) years. While in the eyes of some it may not have progressed fast enough, but it has occurred and it has helped to return persons into Central Honolulu which is the first step in fostering the goal of developing a neighborhood community in which persons live, work, shop and enjoy recreational activities. We believe that one needs to first answer the question of why propose a substantial revamping of the Plan and Rules rather than proposing appropriate adjustments and modifications to what is already in place and generally accepted to foster and encourage those types of developments and activities in Kakaako which seem to be lagging behind. We submit that the Kakaako Redevelopment District does not need to go through another lengthy and protracted learning curve as was evidenced when the authority of HCDA over the Kakaako Redevelopment District was originally established approximately 30 years ago.

Sincerely yours,

SERVCO PACIFIC INC.

*Carol K. Lam*

Carol K. Lam (B)  
Senior Vice President

cc: Hawaii Community Development Authority  
677 Ala Moana Boulevard, Suite 1001  
Honolulu, Hawaii 96813  
ATTN: Susan Tamura

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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KALAELOA

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E-Mail  
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Ref. No.: PL EIS 6.26

July 2, 2008

Ms. Carol K. Lam, Senior Vice President  
Servco Pacific, Inc.  
P.O. Box 2788  
Honolulu, Hawaii 96803

Dear Ms. Lam:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter dated January 22, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

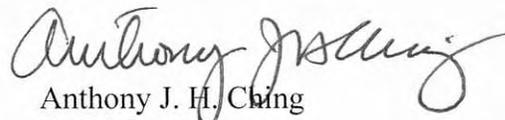
- Your objection to the inclusion of your property (TMK: 2-1-046:001 and 2-1-47: 05 & 06) within the Civic Center neighborhood is noted. The revised Mauka Area Plan proposes the establishment of neighborhoods within Kakaako. The purpose is to create a strong neighborhood identity and to give residents and workers a sense of community and belonging. Further, residents and businesses recognize they have a stake in maintaining the area as a desirable place. The Draft SEIS will include a discussion on neighborhoods and an assessment of its impacts and implications.
- The Draft SEIS will address urban design issues relating to pedestrian environments, maximum road connections, building heights and elements, tower footprint size, orientation and location.
- The Draft SEIS will include parking reduction strategies aimed at creating a more pedestrian friendly and transit-oriented district.
- The need for reserved or work-force housing on Oahu is of major concern to the community. Kakaako presents the means to provide residential opportunities for people of varying incomes, ages and family groups. We agree that finding a balance between providing reserved units and maintaining the economic viability of a project is imperative. The Draft SEIS will assess the proposed reserved housing

Ms. Carol K. Lam  
Servco Pacific, Inc.  
July 2, 2008  
Page 2

program, including proposed requirements, the issue of inclusionary zoning, and equity sharing.

We appreciate your interest and participation in the environmental review process.

Sincerely,

  
Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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RECEIVED  
2008 JAN 8 PM 2 47  
HAWAII COMMUNITY  
DEVELOPMENT  
AUTHORITY

Tom Schnell  
545 Queen St. #639  
Honolulu, Hawaii 96813  
(808) 561-7978

January 5, 2008

Ms. Susan Tamura  
Hawaii Community Development Authority  
677 Ala Moana Blvd., Suite 1001  
Honolulu, Hawaii 96813

**RE: REVISIONS TO THE KAKA'AKO COMMUNITY DEVELOPMENT DISTRICT  
MAUKA AREA PLAN AND RULES SUPPLEMENTAL EISPN**

Dear Ms. Tamura:

Pursuant to Section 11-200-15(B), Hawaii Administrative Rules (HAR) and as a long-term Kaka'ako resident, I request to become a consulted party regarding the Revisions to the Kaka'ako Community Development District Mauka Area Plan and Rules Supplemental Environmental Impact Statement.

Pursuant to Section 11-200-15(C), HAR please provide me with a hard copy of the Revisions to the Kaka'ako Community Development District Mauka Area Plan and Rules Supplemental EISPN. I also request a hard copy of the Supplemental Draft EIS when it is available. If not included as appendixes of the Supplemental Draft EIS, I would also like to receive hard copies of the proposed Kaka'ako Community Development District Mauka Area Plan and Rules.

I can be contacted at the above address and phone number.

Sincerely,



Tom Schnell, AICP

cc: Laurence K. Lau, Office of Environmental Quality Control  
Kevin Butterbaugh, EDAW, Inc.

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



KAKAOKO  
KALAELOA

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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Tom Schnell, AICP  
545 Queen Street, #639  
Honolulu, Hawaii 96813

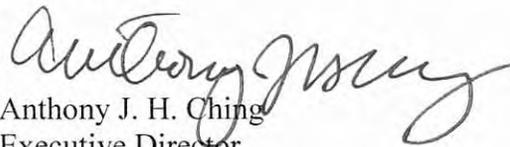
Dear Mr. Schnell:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your letter of January 5, 2008 requesting to be a consulted party on the subject Supplemental Environmental Impact Statement ("SEIS"). A copy of the Draft SEIS and the working Draft Mauka Area Plan will be provided to you for your review and comment.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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January 21, 2008

To: Susan Tamura, HCDA; Kevin Butterbaugh, EDAW Inc.

From: Webster K. Nolan, Co-owner/Resident, Unit 1005, Royal Capitol Plaza 

Re: Comments on Preparation Notice SEIS Revisions to Kakaako Mauka Area Plan

As an interested party in this matter, this memo requests responses to the following issues discussed in the Preparation Notice:

**Infrastructure:** Because the contemplated development in the area will almost certainly require substantial public expenditures during the next decade to expand the capacity of sewer, water and power distribution, a detailed assessment of existing facilities should be required by HCDA before any major projects are green-lighted, so that development guidelines will proceed from a more realistic base than is currently available. The current difficulties facing the City of Honolulu in confronting its own infrastructure budgetary dilemmas and the resultant repair-related near-chaotic traffic conditions on many thoroughfares, vividly illustrate the consequences of failing to acknowledge, identify and prioritize sewer, water and power distribution needs. Most especially, a block-by-block inspection of sewer and water lines would enable HCDA to make reality-based decisions about the wisdom and practicality of proposed construction projects in the area.

**Transportation:** The Prep Notice acknowledges serious challenges yet seems to assume that major development can proceed even in the short term without any clear answers about the type and routing of additional public transit. Pledges of cooperation among the relevant agencies and descriptions of inter-modal movement and pedestrian-friendly objectives are too ambiguous for a task involving massive funds and major changes in a relatively small, 450-acre district. It is to be hoped that the HCDA board and the City of Honolulu, perhaps even the Legislative and Executive branches of state and local government, will set forth specific procedures and lines of authority enabling the appropriate agencies to coordinate their projects in Kakaako.

**Noise:** A decision to live and/or work in a mixed-use area such Kakaako Mauka implies acceptance of a reasonable amount of urban noise. As the Prep Notice observes, area inhabitants already endure daily intrusions of construction, traffic and industrial noise, as well as the sound of planes leaving and landing at Honolulu Airport. Not mentioned in the Notice are other disruptive noises, mostly at night, such as car alarms from unattended parking structures, fire engine noises from the Queen Street fire station and ambulance sirens coming and going from nearby Queens Hospital, loud arguments and occasional street brawls outside bars, occasional helicopter racketing around on various medical, police and survey missions. All this might be considered "a reasonable amount" of urban noise. But the "short term" impact discussed by the Prep Notice in regard to future construction is an entirely different matter requiring a set of enforceable rules protecting area residents.

For one thing, the problem cannot be dismissed as “short-term,” because the HCDA clearly intends to encourage major construction in the area for a decade or more. Nor should HCDA blithely turn the matter over to DOH, as implied in Section 4.2.3 of the Notice. The idyllic goals of live-work-shop-play and community spirit should not be achieved at the cost of severe stress and disruption in the lives of current residents during the next 10-plus years.

Fortunately, construction technology has made significant strides in noise-reduction. HCDA and relevant agencies, especially DOH, should secure for existing and incoming residents and businesses the protection of these technologies (e.g. screw pile-driving) and should give developers plenty of advance notice that they will be required to use up-to-date noise reduction methodology. This will likely add to construction costs that will necessarily be passed along to buyers who will, in turn, need to face the decision whether they wish to pay for the benefits of living and/or doing business in Kakaako. At the same time, HCDA will need to adjust its policies so that these additional construction costs will not be passed along to buyers of the 20 percent of its “reserved housing.”

**Views:** The Prep Notice acknowledges the need for certain view corridors (e.g. from points at Waterfront Park and Kewalo Basin to the Koolaus) and cites “significant views” (e.g. Koolaus, downtown skyline, Waterfront Park) but totally ignores the impact of high-rise buildings that block views that many residents consider “significant.” For example, the nearly completed 42-story Keola La’i condo has already deprived more than 100 residents of a nearby apartment building (Royal Capitol Plaza) of their ocean, sunset and Waianae mountain views, which raises the question of how many other Kakaako residents and residents-to-be will lose their “significant” views to future development. It would seem reasonable for HCDA to furnish an estimated figure, given its self-portrayal as benevolent overseer of the district.

**Open Space:** A reader unfamiliar with the Mauka Area might be misled by the discussion in Section 2.3.3, and mistakenly conclude that the area is doing pretty well in terms of public access to parks. However, much of the “green” space is not really available to the public, from a practical standpoint. For example, a sizeable part of the Mother Waldron play area and most of the pocket park at Kawaiahao and Cooke streets are frequently occupied by homeless people whose presence tends to drive away other potential users, and whose presence in the Mauka Area may soon be expanded because of OHA’s plans to build an office in the shoreline warehouse area now used as a homeless shelter.

Further, the accompanying map's green area on King Street across from Straub seems to be the old cemetery, an unlikely recreational site, and the green section at South and Ala Moana on the map appears to be privately owned, while the green sections abutting Waldron play area and in the McKinley High area are, I believe, controlled by the DOE. The narrative also talks about 17 acres in the area that are, if I read correctly, "on-site recreational space," that is, private not public facilities. The hard fact seems to be that public access to green places is severely limited (even Waterfront Park has some unattractive aspects that common sense suggests be avoided). Given the high value of land in the area, it's unlikely that much additional green area will be available to the public. New residents might well find recreational space in their new high rises but the HCDA concept of stimulating a neighborhood village through readily accessible parks seems somewhat unrealistic.

**Density:** This is an issue that permeates the entire discussion in the Prep Notice. Policy ideas such as minimum 40-foot-high frontages and maximum 65 feet on new buildings only a few steps from street furniture and low-rise walls, and notions of an escalating height maximum toward the mauka area, and statements about unavoidable increases in traffic congestion and serious parking problems, seem to conflict seriously with the desire for a village atmosphere, a more pedestrian-friendly area, including some sidewalk widening and easier access to the Waterfront park and other green area. It all starts to suggest that planners have learned little from the grim, perpetually shadowed areas like the Hobron Lane development or even the somewhat brighter but equally congested Makiki area. Is Honolulu trying to avoid urban sprawl by creating more vertical sprawl, this time in Kakaako Mauka?

Finally, a suggestion. I propose that staff take a close look at the Curtis Street corridor, where I live, to profit from the mistakes of predecessors. Curtis is a narrow street posted on both sides with several "NO STANDING, PARKING, STOPPING" signs, which are violated consistently, thereby creating continuing traffic hazards. The congestion occurs partly because authorities allowed construction of two side-by-side multi-floor parking structures which feed vehicles onto the street throughout the day, partly because authorities failed to require the developer of the multi-story office building at Curtis/ Kawaiahao to provide adequate parking space for delivery vehicles (which, in turn, creates additional hazards because the illegally parked delivery vehicles block views of oncoming traffic), also because the HPD rarely enforces traffic regulations, despite pleas to do so. When I discussed this daily problem with a previous HCDA executive director, the response was basically, "not our fault." I hope the present HCDA has moved beyond that mindset.

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HAWAII COMMUNITY  
DEVELOPMENT AUTHORITY



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Ref. No.: PL EIS 6.26

July 2, 2008

Mr. Webster K. Nolan  
Royal Capitol Plaza  
876 Curtis Street, #1005  
Honolulu, Hawaii 96813-5419

Dear Mr. Nolan:

Re: Supplemental Environmental Impact Statement Preparation Notice  
Revisions to the Kakaako Mauka Area Plan and Rules  
Kakaako, Oahu, Hawaii

Thank you for your memo dated January 21, 2008 commenting on the subject Supplemental Environmental Impact Statement ("SEIS") Preparation Notice. We offer the following in response to your comments.

*Infrastructure.* An Infrastructure Master Plan is being prepared in conjunction with the Draft SEIS. The Infrastructure Master Plan will include an assessment of the adequacy of existing storm drain, sanitary sewer, water, synthetic natural gas, electric power, telephone, cable and communications systems.

*Transportation.* Information on the type and routing of public transportation through the district will be provided in the Draft SEIS. Your suggestion that the Hawaii Community Development Authority ("HCDA") and the City and County of Honolulu as well as applicable state and local government entities set forth specific procedures and lines of authority to coordinate projects within the Kakaako District is noted.

*Noise.* The Draft SEIS will include an assessment of noise and noise control within the Mauka Area. Although noise is difficult to regulate, the Draft SEIS proposes noise attenuating equipment as well as adherence to provisions of Title 11, Chapter 46, Hawaii Administrative Rules, Community Noise Control.

*Views.* To mitigate the impairment of existing Mauka-Makai views, the Draft Mauka Area Plan proposes the following measures: (1) reducing maximum building footprint from 16,000 square feet to 9,000 square feet; (2) restricting building heights along Ala Moana Boulevard; and (3) an

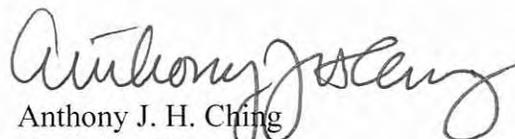
Mr. Webster K. Nolan  
July 2, 2008  
Page 2

Mauka-Makai orientation of towers. These urban design proposals will be discussed in the Draft SEIS.

- *Open Space.* Your comment that the Kakaako Community Development District (“KCDD”) is lacking in publically accessible park facilities is noted. Strategies for meeting recreational needs of the Kakaako district will be discussed in the Draft SEIS.
- *Density.* Your comments on the contradictory policies of creating an urban village atmosphere while allowing higher street-front buildings and projections of increases in traffic congestion and parking problems are noted. The Draft Mauka Area Plan retains the original concept of a mixed-use district, where uses can be mixed horizontally as well as vertically. In an effort to create urban villages, the Draft Mauka Plan proposes to create a better pedestrian environment, create great public spaces and strengthen connections throughout and with surrounding neighborhoods and districts.

We appreciate your interest and participation in the environmental review process.

Sincerely,



Anthony J. H. Ching  
Executive Director

AJHC/ST:lh

c: EDAW, Inc.

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