FINAL ENVIRONMENTAL IMPACT STATEMENT

INTERNATIONAL MARKET PLACE REVITALIZATION PROJECT

Appendix 14

EISPN/Agency Comment Letters

NEIL ABERCROMBIE
GOVERNOR

JAN S. GOUVEIA
ACTING COMPTROLLER

KERRY K. YONESHIGE
ACTING DEPUTY COMPTROLLER

STATE OF HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAI'I 96810-0119

(P)1350.1

DEC 2 3 2011

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawai'i 96822

Dear Mr. Kurahashi:

Subject: International Market Place Revitalization Project
TMK: (2)-6-22: 36, 37, 38, 39, and 43

Thank you for the opportunity to provide comments for the subject project. This project does not impact any of the Department of Accounting and General Services' projects or existing facilities in the general area, and we have no comments to offer at this time.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Alva Nakamura of the Public Works Division at 586-0488.

Sincerely,

JAN S. GOUVEIA
State Acting Comptroller

c: Ms. Joyce Shoji
Mr. Terry Fitzgerald

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Ms. Jan S. Gouveia, State Acting Comptroller
Department of Accounting and General Services
State of Hawaii
P.O. Box 119
Honolulu, Hawaii 96810-0119

Attention: Mr. Alva Nakamura
Division of Public Works

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Ms. Gouveia:

Thank you for your comments of December 23, 2011 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the project does not impact any of the Department of Accounting and General Services' projects or existing facilities in the general area and that your office has no comments at this time.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

NEIL ABERCROMBIE
GOVERNOR

KATHRYN S. MATAYOSHI
SUPERINTENDENT

STATE OF HAWAI'I
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAI'I 96804

OFFICE OF THE SUPERINTENDENT

December 27, 2011

Mr. Keith Kurahashi, President
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Environmental Impact Statement Preparation Notice for the International Market Place Revitalization Project, TMK 2-6-22:36-39 and 43, Honolulu, Oahu

The Department of Education (DOE) has reviewed the Environmental Impact Statement Preparation Notice for the proposed International Market Place Revitalization Project.

The DOE has no comment to offer.

Thank you for the opportunity to provide comments. If you have any questions, please call Jeremy Kwock of the Facilities Development Branch at 377-8301.

Very truly yours,

Kathryn S. Matayoshi
Superintendent

KSM:jmb

c: Ann Mahi, Acting CAS, Kaimuki/McKinley/Roosevelt Complex Areas
Joyce Shoji, Department of Planning and Permitting
Terry Fitzgerald, TRG IMP, LLC
Gary Hooser, Director, OEQC, DOH
Randolph G. Moore, Assistant Superintendent, OSFSS

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March 6, 2012

Ms. Kathryn S. Matayoshi, Superintendent
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, Hawaii 96804

Attention: Mr. Jeremy Kwock
Facilities Development Branch

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Ms. Matayoshi:

Thank you for your letter of December 27, 2011 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the Department of Education has no comment to offer.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

DEPARTMENT OF PARKS & RECREATION

CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707
Phone: (808) 768-3003 • Fax: (808) 768-3053
Website: www.honolulu.gov

PETER B. CARLISLE
MAYOR

GARY B. CABATO
DIRECTOR

ALBERT TUFONO
DEPUTY DIRECTOR

December 27, 2011

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Keys: 2-6-22:36, 37, 38, 39 and 43

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice for the International Market Place Revitalization Project.

The Department of Parks and Recreation has no comment, as the proposed project will not impact any program or facility of the department. You may remove us as a consulted party to the balance of the EIS process.

Should you have any questions, please contact Mr. John Reid, Planner, at 768-3017.

Sincerely,

GARY B. CABATO
Director

GBC:jr
(445454)

cc: Joyce Shoji, Department of Planning and Permitting
Terry Fitzgerald, TRG IMP LLC

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Mr. Gary B. Cabato, Director
Department of Parks and Recreation
City and County of Honolulu
1000 Uluohia Street, Suite 309
Kapolei, Hawaii 96707

Attention: Mr. John Reid

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Cabato:

Thank you for your letter of December 27, 2011 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the Department of Parks and Recreation has no comment, since the proposed project will not impact any program or facility of the department.

The applicant through this letter requests that the Department of Planning and Permitting remove your department as a consulted party for the balance of the EIS process.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

JEFF MERZ
WAIKIKI NEIGHBORHOOD BOARD NO. 9

HONOLULU HALE
530 SOUTH KING STREET, ROOM 406
HONOLULU, HAWAII 96813

NEIGHBORHOOD COMMISSION OFFICE
PHONE: (808) 258-7802
eMail: jeffmerz@rocketmail.com

December 27, 2011

City and County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, HI 96813
Attn: Joyce Shoji

Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, HI 96822
Attn: Keith Kurahashi

Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, HI 96813

Re: **Environmental Impact Statement Preparation Notice (EISPN) - International Market Place Revitalization Project**

Thank you for including the Waikiki Neighborhood Board in the review process for the above-referenced project. For generations, the non-profit Queen Emma Land Company has helped support and advance health care in Hawaii. Its legacy and contributions to the Hawaii community cannot be underestimated. Following are comments on the EISPN. We hope our concerns will be addressed in full in the draft EIS.

Chapter 2, Page 8. Section 2.1
Elaborate on how the addition of a vehicle loading/turn lane east-bound on Kuhio Avenue will affect the pedestrian access way and pedestrian flow. Sidewalks in Waikiki are increasingly crowded. Ensure that the width of the sidewalk is not reduced and in fact is widened where feasible.

Chapter 2, Page 11. Section 2.4.5
Chapter 8, Page 56. Section 8.6.4
Similarly to the above, while the Wilson Okamoto traffic analysis' chief task it to study ways to improve capacity, flow and access for vehicles, this cannot come at the expense of pedestrian, bicycle or transit users. Almost all of the recommendations in this section are predicated on benefiting vehicles, while the vast majority of residents and visitors in Waikiki are on-foot. Of note is recommendation #10. Elaborate on what type of 'physical barrier' is proposed to separate the proposed queuing lane from Kuhio Avenue. Further hardening and widening of any roadway can create both physical and psychological impediments to pedestrians and bicyclists.

Finally, #13 describes the Traffic Management Plan as focusing solely on strategies related to vehicles, (increasing road capacity/facilitating car movements). The TMP should focus holistically on mobility in general, in and around the project site. For example, with increasing pedestrian flow along both Kuhio and Kalakaua Avenues, vehicle access to and from hotel entrances for loading and unloading is increasingly difficult. Examples of this include the Moana Surfrider, Holiday Inn and the Outrigger, all on Kalakaua Avenue. Ensure that the TMP addresses this increasing conflict in a way that accommodates vehicles while not compromising pedestrian, transit or bicycle access.

Chapter 2, Page 12. Section 2.4.6
The status of Bills, 52, 53, and 54 has changed since the publication of this EISPN. Please provide an update of them in the draft EIS document and if/how they would impact the area around the project.

Chapter 3, Page 16. Section 3
As noted in this letter's opening remarks, our community benefits greatly from the mission of the Queen Emma Land Company. Far from being a typical commercial endeavor to benefit private developers and retailers only, the Queen Emma Land Company's redevelopment of the International Market Place area with result in direct benefits to Hawaii's health care system, in addition to anticipated increased tax revenue. We suggest you consider elaborating on this unique arrangement so that the community is clear on QELC's historical purpose and mission.

Chapter 6, Page 32. Section 6.3.2
Chapter 7, Page 42. Section 7.5.1.4
As described in these sections, the PK development will be providing 812 parking spaces and the International Market Place project will be providing 776 parking spaces for a total of close to 1600 parking spots just for these two developments. This would appear to far exceed any minimum parking requirements by the zoning code. In addition, the vast majority of visitors, shoppers and residents of Waikiki, circulate on foot. The need for this quantity of parking is further called into question considering the amount of available spaces at the Royal Hawaiian Shopping Center, the Waikiki Trade Center and smaller parking decks in the immediate area. While the provision of excessive parking in itself is not prohibited under the zoning code, its impacts in dense urban areas such as ours can be significant, and can result in the following:

- Inducement of increased driving and vehicle miles travelled (VMT), especially when parking is provided free or at a discount (subsidized) rate.
- A localized deterioration of air quality and increase in greenhouse gas (GHG) emissions into the atmosphere.
- Increased vehicle noise and congestion.
- Increased overall construction costs due to the high cost of parking structures.
- The architectural 'wall' created where parking garages abut sidewalks and the reduction of vitality along the pedestrian streetscape.
- Along street corridors, the visual blight created by street-frontage high rise parking decks which traditionally lack ornamentation, architectural enhancements and subtle lighting above its first floor retail stores.

As part of further review of the quantity of parking proposed, we would like to see a commitment to the following recommendations:

- Charge full market-going rates for parking and ensure that it is open to the general public and advertised as such. If parking is offered at a discount or free to shoppers, provide a similar incentive to those on foot/bicycle or transit.
- Provide numerous electric vehicle charging station in the garage.
- The last sentence of Section 6.3.2 mentions synergies between the PK and the Market Place concurrent redevelopment plans that can result in positive effects and public benefits. Work with the PK developers and other contiguous/proximate properties to coordinate parking plans to share spaces, minimize vehicle entrances/exits to streets and have clear signage to parking areas.

- Provide ample, secure and visible bicycle parking areas near the main entrances to the development.
- Consider a bicycle valet service in addition to the vehicle valet service.
- Provide discounted or free transit passes, free bicycle parking and other incentives for employees to refrain from driving to work. Have transit and biking information readily accessible to all employees and visitors.
- Most importantly, we would like to see a parking demand study completed to determine the actual need for parking spaces and the parking demands and occupancy of surrounding properties which may have ample current capacity to accommodate overflow from the International Market Place development.

The promotion of transit, walking and biking and the de-emphasis on personal vehicle use, is consistent with a full range of official policies adopted for Waikiki and its 'pedestrian first' status. The provision of excess parking and lack of an emphasis on alternative transportation, is counter to these policies.

Chapter 7, Page 38. Section 7.2.3
Chapter 8, Page 49. Section 8.3.2
Consider using this redevelopment as an opportunity to exhaust all efficiency and alternative energy options on the site. Ideas to consider at your property include the use of solar water heaters, micro-turbine (canister-type) windmills, incorporation of green roofs, free parking for hybrid/electric vehicles, use of photovoltaics, smart metering and a physical orientation to capture natural trade wind circulation. While Honolulu does not require LEED certification for new developments at this time, we would recommend that you submit for and pursue actual LEED certification in addition to implementing all possible sustainable features for the development.

Chapter 7, Page 47. Section 7.6.1
Explain the rationale and need for a sidewalk variance and what specifically it is.

Chapter 8, Page 56. Sections 8.6.5 – 8.6.8
As in previous discussions on sustainability, work to ensure that the design, maintenance and operation of this development incorporates all appropriate features to reduce energy use, water use, waste, single occupant vehicle use and pollution.

General Comment: The Waikiki Neighborhood Board values the addition of sustainable, low impact, infill renovations in our community. Institutions such as Queen Emma Land Company have a rich and storied history in Hawaii and in Waikiki in particular. We look forward to this project coming to fruition in a manner consistent with the policies, codes and guidelines applicable to Waikiki.

Mahalo for your consideration of the above comments on the EISPN.

Sincerely,

Jeff Merz AICP, LEED AP
Waikiki Neighborhood Development Review

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
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March 6, 2012

Mr. Jeff Merz
Waikiki Neighborhood Board Development Review
Waikiki Neighborhood Board No. 9
C/o Neighborhood Commission Office
Honolulu Hale
530 South King Street, Room 406
Honolulu, Hawaii 96813

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project

Dear Mr. Merz:

Thank you for your letter of December 27, 2011 regarding the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same:

Chapter 2, Page 8. Section 2.1

The addition of the vehicle loading/turn lane east-bound on Kuhio Avenue will be coupled with a sidewalk variance and easement on private property which together create a condition which provides safety for pedestrians and improves overall traffic flow in the public right of way. An alternative design would be to have the valet occurring only on private property and no sidewalk easement which has the potential to interrupt pedestrian flow along the sidewalk. With the proposed design, the sidewalk section along Kuhio will be as wide or wider than the existing condition with the widest sections occurring at the Ewa end and along the entryway into the Project. Those sections will be wide enough to accommodate seating and landscaping as well.

Chapter 2, Page 11. Section 2.4.5
Chapter 8, Page 56. Section 8.6.4

The physical barrier proposed in recommendation #10 will be a low curb extending past the Nahua Street intersection with openings for two crosswalks. This curb is intended to prevent vehicles in the passenger loading/turn lane from merging into east bound traffic at the intersection or crosswalks, thereby eliminating any conflict from a merge move with pedestrians using the crosswalk or vehicles turning onto Kuhio Avenue from Nahua Street.

We will ensure that the Traffic Management Plan (TMP) focuses holistically on mobility in general, in and around the Project site. Pedestrian flow and safety is as paramount as traffic

flow, particularly since the large majority of the Project's visitors will be on foot. We want the Project to be safe and friendly to all however they arrive – on foot or bicycle, via shuttle or public transit, or by car. As described above, the current design is intended to help minimize vehicle and pedestrian conflicts during passenger drop-offs. The Project's loading areas are also out of the public right of way and sidewalk areas further increasing pedestrian safety and reducing sidewalk congestion. Bike racks will be provided near the Project entries on both streets, with additional racks in the parking garage as needed to satisfy bike-user demand. The TMP will encourage its employees to use public transit and carpools and will encourage and assist tenants in doing the same for their employees.

Chapter 2, Page 12. Section 2.4.6

Bills 52, 53 and 54 were adopted shortly after publication of the EISPN. The Draft EIS will discuss the impact that adoption of these Bills will have on the area around the Project site. The zone change in Bill 53 and the revised Waikiki Special District in Bill 52 allow hotel, timeshare and condominium development within the new Resort Mixed Use Precinct and revise the development standards for this Precinct. The surrounding properties affected by the zone change in Bill 53 being rezoned from Resort Commercial Precinct to Resort Mixed Use Precinct include the Holiday Inn Waikiki Beachcomber Hotel, three parcels owned by HI 120 Development Inc., the Waikiki Business Plaza, the Waikiki Trade Center and the Aqua Waikiki Wave Hotel. The Holiday Inn Waikiki Beachcomber (23 stories, 496 rooms) and the Aqua Waikiki Wave Hotel (15 stories, 247 rooms) are existing nonconforming hotels. We are currently not aware of any plans to redevelop these hotels with the new zoning. Of the three parcels owned by HI 120 Development Inc., one was recently developed with a three-story shopping center and the other two were developed with a 40,000 square-foot Ross Dress for Less Store that opened last October. We are not aware of any plans to redevelop these properties at this time. Further, we are not aware of any plans to redevelop The Waikiki Business Plaza (18 stories, 165,000 square feet) or the Waikiki Trade Center (21 stories, 205,000 square feet).

Bill 54 relates to personal property placed on public property for more than 24 hours and would not affect the Project. It does however, allow the City to remove such property after 24 hours to discourage clutter on the City sidewalks.

Chapter 3, Page 16. Section 3

We thank you for your kind comments. In the Draft EIS we will elaborate on the unique arrangement and relationship of the redevelopment of the International Market Place and the Queen's Medical Center. The Queen's Medical Center's mission is to fulfill the intent of Queen Emma and King Kamehameha IV to provide in perpetuity quality health care services to improve the well-being of Native Hawaiians and all the people of Hawaii. The land underlying the redeveloped project will continue to be owned by the Queen Emma Land Company on behalf of the Medical Center and the revenues it derives will go directly to support that mission. We also want to add that we will devote a portion of one of the large courtyards to telling the story of the Royal family and the legacy of their dedication to the Medical Center. While the details have yet to be determined, we want to provide the Project's many visitors with the opportunity to

understand and appreciate the Royal family's dedication and the continuing importance of that legacy.

Chapter 6, Page 32. Section 6.3.2
Chapter 7, Page 42, Section 7.5.1.4

We appreciate the concerns you raise about parking and parking structures. There is public parking at existing projects nearby and the Princess Kaiulani development is proposing 812 spaces as you point out. Notwithstanding that, however, we believe the parking we are providing and the manner in which it is being provided is critical to the long-term success of a revitalized International Market Place. To be successful, the Project must attract not only tourists and immediately nearby residents, but all residents of the Island and it is being designed with that objective in mind. In addition to a tenant mix which will include a variety of stores not found elsewhere in Hawaii, we intend to provide a unique dining and entertainment experience on the third level with a cluster of restaurants providing outdoor dining in view of the Exceptional Tree canopy as well as cultural and other entertainment venues reminiscent of the heyday of the IMP. We want the local population not within walking distance to also rediscover IMP, and a key element will be to provide safe, convenient and competitively-priced parking.

We acknowledge the great majority of patrons will arrive on foot. Were this Project located in a typical suburban area, the likely parking demand would be between 1,600 and 1,800 cars (a parking ratio of 4.5 to 5.0 spaces per 1,000 square feet of gross leasable area). At 776 stalls, we are applying our best knowledge of anticipated customer demand given our view that the Project will attract a wider audience of local residents. The Royal Hawaiian shopping center has 611 stalls serving 310,000 square feet of gross leasable area or 1 stall per 507 square feet (1.98 parking ratio). Our proposal of 1 stall per 457 square feet (2.19 parking ratio) is approximately the same, and we think appropriate. Since we will not be able to add needed parking once the Project is built, we have sized the parking consistent with our stated objective of attracting local residents back to IMP in order to assure the Project's long-term success.

It is also important to note that the parking is being provided above the retail. While it has the design benefit of removing the garage from the street-level pedestrian experience, it has the direct advantage of delivering all parking patrons to the third level of the Project. With direct access to the dining terrace and the ability to shop the Project from top to bottom and back, it will ensure the upper levels of the Project get accessed and shopped, which is necessary for the Project's success.

The Project's impacts will be addressed in the Draft EIS. The Draft EIS will include an air quality study and an acoustic study, and both acknowledge that long term impacts are primarily related to traffic. The air quality study notes that the Project will have negligible impact on traffic related air quality impacts. The acoustic study indicates that increases in future traffic noise levels resulting from the Project are not considered to be significant.

The Traffic Study indicates that with the implementation of the study's recommendations for traffic mitigation, the Project is not expected to have a significant impact on traffic operations in the Project vicinity.

The design of the exterior face of the parking levels will be carefully planned to provide articulation, architectural enhancements and subdued lighting. Being located above the retail with the first parking level at 36 feet above street-level, it will not have the same adverse pedestrian experience impact that a typical street-level garage would otherwise have.

In response to the specific recommendations in your letter:

- The parking will be open to the general public and will be charged at market rates. While we have not determined specifics, however, we do intend to explore the possibility of selective validation or discount to the Project's shoppers in order to keep it competitive with other significant retail venues in Honolulu. Bicycle parking will be free. There will be no charges associated with those arriving on foot or by transit. Our TMP will encourage employees to use public transit and carpools and will encourage and assist tenants in doing the same for their employees.
- Electric vehicle charging stations will be provided in the parking structure.
- We will work collaboratively with the Princess Kaiulani developers and all of the adjoining property owners to develop traffic management practices and coordinate parking areas and signage in a way that will be mutually beneficial to all concerned. We believe the design proposed minimizes vehicle entrances and exits to streets but do not anticipate a sharing of parking which would reduce the number of immediately proximate spaces needed to support the third level.
- Convenient bike racks will be provided near the Project entries on both Kalakaua and Kuhio Avenues, with additional racks in the parking garage as needed to satisfy bike-user demand.
- We do not believe a bicycle valet service will be necessary given convenient bike racks at both Project entries. If demand otherwise warrants once the Project opens, we would certainly consider its need and viability.
- The Traffic Report assumes 70% of visitors will arrive by means other than vehicles. At a 2.19 parking ratio, we are not providing parking to satisfy typical vehicle demand which would require a parking ratio of 4.5 to 5.0 cars per thousand of gross leasable area. Rather, we are providing the parking we believe is needed to provide convenient, competitively-priced parking for local residents who want to visit the Project even during peak demand periods – most notably during evening dinner hours and special entertainment events. The parking provided results from Applicant's extensive experience in the retail business and the need to provide the parking it believes necessary to ensure the Project's success, and therefore, we do not plan to prepare additional parking demand studies.

We believe the Project will further the objective of the WSD to support the efficient use of multimodal transportation in Waikiki and the encouragement for the use of public transit, while

at the same time balancing the critical need for additional parking at the Project in order to attract local residents back to the International Market Place and ensure its success over the long term.

Chapter 7, Page 38. Section 7.2.3
Chapter 8, Page 49. Section 8.3.2

It is our intention to design, maintain, and operate the Project employing best practices for energy efficiency and environmental sustainability for projects of its kind. The new buildings will meet or exceed the energy efficiency code requirements. We will review all applicable LEED rating systems, use the certification standards as guidelines, and pursue certification when financially feasible. The 'open air' nature of the center will reduce our projected energy consumption from the lighting and mechanical systems. Passive lighting will be maximized and the makai to mauka orientation of the pedestrian open spaces will take advantage of the trade wind circulation. We intend to incorporate high performance building skins and roofing in our project to maximize our building thermal efficiency. We will explore the use of photovoltaic panels above the parking deck as a financial and environmental strategy – but also for screening and shading reasons. We will implement low-flow plumbing fixtures, explore waterless urinals, incorporate efficient landscape irrigation systems, and explore the use of non-potable water in our planting areas in an effort to further reduce wastewater and potable water demands. We will reduce our material waste through effective construction and operational recycling programs and consider the use of solar hot water heaters, wind turbines, and smart metering as additional green initiatives. Green Tenant Design & Operation Guidelines will be issued to all of our tenants to encourage ongoing energy efficiency and environmental measures. Given our limited roof area, we do not feel a grass roof is practical. However, we plan to use extensive landscaping on the top level and throughout the entire project. As and when we determine our parking charge strategy, we will consider creating incentives for electric and hybrid vehicles and will develop the same along with our TMP which will address incentives for use of rapid transit and carpooling.

Chapter 7, Page 47. Section 7.6.1

As described above, the addition of the vehicle loading/turn lane east-bound on Kuhio Avenue is coupled with a sidewalk variance and easement on private property which together create a desirable condition for pedestrians as well as improving overall traffic flow in the public right of way. The sidewalk variance will be allow landscaping and the new lane on Kuhio Avenue to occur along Kuhio Avenue in an area normally reserved for a sidewalk. In connection with the variance, a public benefit easement will be needed for a sidewalk area on the Applicant's property. Together with the sidewalk easement on private property, the resulting sidewalk section along Kuhio would be as wide or wider that the existing condition with the widest sections occurring at the Eva end and along the entryway into the Project.

Chapter 8, Page 56. Sections 8.6.5 - 8.6.8

As described above, we intend to design, maintain and operate the Project employing best practices for energy efficiency and environmental sustainability.

General Comment

We appreciate your supportive comments and will work to ensure that this Project is developed in a manner consistent with the policies, codes and guidelines applicable to Waikiki. We will also work collaboratively with the Waikiki Neighborhood Board throughout the development of the Project and thereafter to address any issues or concerns that may arise.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRG IMP LLC

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 Ulu`ohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
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PETER B. CARLISLE
MAYOR

WESTLEY K.C. CHUN, Ph.D., P.E., BCEE
DIRECTOR & CHIEF ENGINEER

KENNETH A. SHIMIZU
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 12-12

January 9, 2012

Kusao & Kurahashi, Inc
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Attention: Mr. Keith Kurahashi

Dear Mr. Kurahashi:

Subject: Environmental Impact Statement Preparation Notice (EISPN) - International Market Place Revitalization Project

Thank you for the opportunity to review the EISPN or the subject project.

We have no comments to offer.

Should there be any questions, please contact Tyler Sugihara, Chief of the Division of Road Maintenance, at 768-3600.

Sincerely,

Westley K.C. Chun, Ph.D, P.E., BCEE
Director and Chief Engineer

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
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March 6, 2012

Westley K.C. Chun, Ph.D, P.E., BCEE
Director and Chief Engineer
Department of Facility Maintenance
City and County of Honolulu
1000 Uluohia Street, Suite 215
Kapolei, Hawaii 96707

Attention: Tyler Sugihara, Chief
Division of Road Maintenance

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Chun:

Thank you for your letter of January 9, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the Department of Facility Maintenance has no comments to offer.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

POLICE DEPARTMENT

CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulupd.org

PETER B. CARLISLE
MAYOR

LOUIS M. KEALOHA
CHIEF

DAVE M. KAJIHIRO
MARIE A. McCAULEY
DEPUTY CHIEFS

OUR REFERENCE JT-LS

January 9, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

This is in response to a letter from the City Department of Planning and Permitting (dated December 13, 2011) regarding the Environmental Impact Statement Preparation Notice for the International Market Place Revitalization project.

This project may cause an increase in calls for police service because of the anticipated pedestrian and vehicle traffic congestion during the construction phase. However, once the project is completed, it should have no significant impact on the facilities or services of the Honolulu Police Department.

If there are any questions, please call Major Ron Bode of District 6 (Waikiki) at 529-3361.

Sincerely,

LOUIS M. KEALOHA
Chief of Police

By
JOHN THOMPSON
Acting Assistant Chief of Police
Support Services Bureau

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Louis Kealoha, Chief of Police
Honolulu Police Department
City and County of Honolulu
801 South Beretania Street
Honolulu, Hawaii 96813

Attention: Major Ron Bode
District 6 - Waikiki

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Chief Kealoha:

Thank you for your letter of January 9, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same.

The applicant understands that the project may cause an increase in calls for police service because of the anticipated pedestrian and vehicle congestion during the construction phase.

The applicant appreciates your determination that once the project is completed, it should have no significant impact on the facilities or services of the Honolulu Police Department.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

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

PETER B. CARLISLE
MAYOR

KENNETH G. SILVA
FIRE CHIEF

EMMIT A. KANE
DEPUTY FIRE CHIEF

January 9, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Honolulu, Hawaii
Tax Map Keys: 2-6-022: 036-039 and 043

In response to a letter from Mr. David Tanoue of the City's Department of Planning and Permitting (DPP) dated December 13, 2011, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following requirements be met:

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 the 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 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 contact Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151 or sbratakos@honolulu.gov.

Sincerely,

KENNETH G. SILVA
Fire Chief

KGS/SY:bh

cc: Joyce Shoji, DPP
Office of Environmental Quality Control
Terry Fitzgerald, TRG IMP LLC

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

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

Attention: Battalion Chief Socrates Bratakos
Fire Prevention Bureau

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Chief Silva:

Thank you for your letter of January 20, 2012 regarding the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same.

1. We understand the applicable code requirements for fire apparatus access roads. Due to the unique nature of the redevelopment project, we will engage a highly-qualified fire code consulting firm to develop a fire suppression system which addresses fire coverage and life safety issues for the open plaza central portion of the site and which will be subject to your review and approval.

2. We will provide a water supply, approved by the County, capable of supplying the required fire flow for fire protection of all facilities and buildings on the premises. Specifically, we will assure on-site fire hydrants and mains are provided when any portion of a facility or building is in excess of 150 feet (45 720mm) from a water supply on a fire apparatus access road, as measured by an approved route under the 1997 Uniform Fire Code, Section 903.2, as amended.

3. Civil and construction drawings will be submitted to the Honolulu Fire Department for review and approval.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

BOARD OF WATER SUPPLY

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

PETER B. CARLISLE, MAYOR

RANDALL Y. S. CHUNG, Chairman
DENISE M. C. DE COSTA, Vice Chair
THERESIA C. McMURDO
DUANE R. MIYASHIRO
ADAM C. WONG

WESTLEY K.C. CHUN, Ex-Officio
GLENN M. OKIMOTO, Ex-Officio

DEAN A. NAKANO
Acting Manager

January 10, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Incorporated
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: The Letter Dated December 13, 2011 Requesting Comments on the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project, TMK: 2-6-22: 36, 37, 38, 39 and 43

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

The existing water system is 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.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

The proposed project is subject to Board of Water Supply Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the building permit application.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,

Susan Uyesugi

SUSAN UYESUGI
Program Administrator
Customer Care Division

cc: Ms. Joyce Shoji, Department of Planning and Permitting
Mr. Terry Fitzgerald, TRG IMP LLC
Office of Environmental Quality Control

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
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FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Ms. Susan Uyesugi
Program Administrator, Customer Care Division
Board of Water Supply
City and County of Honolulu
630 So. Beretania Street
Honolulu, Hawaii 96813

Attention: Mr. Robert Chun

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Ms. Uyesugi:

Thank you for your letter of January 10, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same.

The applicant appreciates your comment that the existing water system is presently adequate to accommodate the proposed development. However, the applicant further understands that the final decision on availability of water will be confirmed when the building permit application is submitted for approval.

The applicant understands that when water is made available, the applicant will be required to pay your Water System Facilities charges for resource development, transmission and daily storage.

As you have recommended, the on-site fire protection requirements will be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

The applicant further understands that the proposed project is subject to Board of Water Supply cross-connection control and backflow prevention requirements prior to the issuance of the building permit.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

PETER B. CARLISLE
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

KAI NANI KRAUT, P.E.
DEPUTY DIRECTOR

TP12/11-445381R

January 11, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Environmental Impact Statement Preparation Notice (EISPN)
International Market Place Revitalization Project; Honolulu, Oahu, Hawaii; Tax Map Key (TMK): 2-6-22: 36, 37, 38, 39, and 43

This responds to the Department of Planning and Permitting's (DPP) letter of December 13, 2011, requesting our comments concerning this project.

The Traffic Engineering Division (TED) has the following comments:

- The area Neighborhood Board, as well as the area residents, businesses, etc., should be kept apprised of the details of the proposed project and the impacts, particularly during construction, the project may have on the adjoining local street area network, including bicycle and pedestrian traffic.

- Under section 8.6.4., Number 12, the EISPN needs to discuss possible mitigation measures to prevent queuing from the valet pullout on Kuhio Avenue into the adjacent through lane.

- Regarding the Traffic Impact Report, Figure 2, the proposed site plan should show the names of the streets intersecting Kuhio Avenue.

We have the following additional comments:

- Your EISPN should include a description of Public Transit services and operations, the impact of your project on Public Transit bus operations during

construction. Basic information is available on our websites: www.thebus.org and www.honolulu.gov/dts. For more details, you may contact our staff at 768-8370.

- Construction notes should include the following note regarding transit:

  "This project may affect bus routes, bus stops, and paratransit operations, therefore, the Contractor shall notify the Department of Transportation Services, Public Transit Division at 768-8396 and Oahu Transit Services, Inc. (bus operations: 848-4578 or 852-6016 and paratransit operations: 454-5041 or 454-5020) of the scope of work, location, proposed closure of any street, traffic lane, sidewalk, or bus stop and duration of project at least two weeks prior to construction."

Thank you for the opportunity to review this matter. Should you have any further questions, please contact Michael Murphy of my staff at 768-8359.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Attention: Mr. Michael Murphy

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Yoshioka:

Thank you for your letter of January 11, 2012 regarding the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same.

1. We will provide a copy of the Draft and Final EIS to the Waikiki Neighborhood Board (concerned residents receive notice of Neighborhood Board Meetings) and the Waikiki Improvement Association (represents businesses in Waikiki), which documents provide details of the Project and identified impacts. We will also provide a copy of the future application for a Waikiki Special District Permit to both groups. It is our intention to work collaboratively with these groups throughout the development of the Project and thereafter to address any issues or concerns that may arise. As you suggest, during construction, we will provide periodic updates on construction activity to apprise them of matters impacting the adjoining local street network, including bicycle and pedestrian traffic.

2. Under Section 8.6.4, Number 12, the applicant plans to provide the following mitigation measures to prevent queuing from the valet pullout on Kuhio Avenue into the adjacent through lane:

a. The proposed valet pullout lane will extend along the entire length of the project site frontage to minimize the potential for vehicular queuing on Kuhio Avenue.

b. The valet operations will be monitored throughout its operations to ensure that the appropriate number of valet attendants are provided to service and facilitate movements through the valet area.

c. A transportation management plan (TMP) is recommended in the TIAR and will be prepared to address valet demands and operations. In addition, an updated TMP will be prepared once the Project is occupied and in operation to ensure valet operations do not queue to public streets.

d. To minimize or eliminate potential congestion in the valet area which may result in queues extending into Kuhio Avenue, freight loading and unloading operations and other activities not related to valet operations or passenger vehicle or van drop-offs will be prohibited from using these areas. Freight loading operations will be limited to the provided on-site freight loading areas.

3. The Traffic Impact Report, Figure 2, the proposed site plan will be revised to show the names of the streets intersecting Kuhio Avenue.

4. The Draft EIS will include a description of Public Transit services and operations and the impact of our project on Public Transit bus operations during construction.

5. The referenced note regarding transit will be added to our construction drawings as you have recommended.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

NEIL ABERCROMBIE
GOVERNOR
STATE OF HAWAI'I

ALBERT "ALAPAKI" NAHALE-A
CHAIRMAN
HAWAIIAN HOMES COMMISSION

MICHELLE K. KAUHANE
DEPUTY TO THE CHAIRMAN

M. WAIALEALE SARSONA
EXECUTIVE ASSISTANT

STATE OF HAWAI'I
DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879
HONOLULU, HAWAI'I 96805

January 17, 2012

Kusao & Kurahashi, Inc.
Attn: Mr. Keith Kurahashi
Suite 5-202
2752 Woodlawn Drive
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Environmental Impact Statement Preparation Notice (EISPN)
International Market Place Revitalization Project
Tax Map Key Numbers 20-6-22: 36, 37, 38, 39, & 43

Thank you for the opportunity to review the subject Environmental Impact Statement Preparation Notice (EISPN). The Department of Hawaiian Home Lands has no comment to offer at this time.

If you have any questions, please contact our Planning Office at (808) 620-9480.

Me ke aloha,

Albert "Alapaki" Nahale-a, Chairman
Hawaiian Homes Commission

Cc: Department of Planning and Permitting, Joyce Shoji
TRG IMP LCC, Terry Fitzgerald

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
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BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Mr. Albert "Alapaki" Nahale-a, Chairman
Department of Hawaiian Home Lands
State of Hawaii
P.O. Box 1879
Honolulu, Hawaii 96805

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Nahale-a:

Thank you for your letter of January 17, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the Department of Hawaiian Home Lands has no comment to offer at this time.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

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) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

PETER B. CARLISLE
MAYOR

DAVID K. TANOUE
DIRECTOR

JIRO A. SUMADA
DEPUTY DIRECTOR

2011/ED-11(js)

January 20, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Chapter 343, Hawaii Revised Statutes
Environmental Impact Statement Preparation Notice (EISPN)
Project: International Market Place Revitalization Project
Applicant: TRG IMP LLC
Agent: Kusao & Kurahashi, Inc.
Location: 2290, 2318, 2324, 2330 and 2332 Kalakaua Avenue; 2301 and 2345 Kuhio Avenue - Waikiki
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Transmitted for your response and incorporation into the Draft Environmental Impact Statement (DEIS) are comments on the above EISPN by the Department of Planning and Permitting. In accordance with the procedural provisions of Chapter 343, Hawaii Revised Statutes, you must respond, in writing, to these and any other comments that were submitted during the 30-day comment period (which began with the publication of a notice of availability of the EISPN in The Environmental Notice on December 23, 2011). The DEIS must include these comments and responses, as well as the revised text, where needed.

1. "Project Information Summary"

   a. Revise Section 2.4.6 and other affected sections to reflect Land Use Ordinance (LUO) text and map changes in Ordinances 11-30 and 11-31, related to the Waikiki Special District (WSD). All references to the Resort Commercial Precinct should be omitted.

   b. A "Zoning Adjustment" is the land use permit required for the Sign Master Plan.

2. "Relationship to Land Use Plans, Policies and Controls"

   a. Items 7.5.1.1 to 7.5.2.7 refer to the WSD Design Guidelines and should be prefaced accordingly.

b. Compliance with the Resort Mixed Use Development Standards shall be listed or itemized. The maximum permitted and proposed floor area and floor area ratio shall be provided.

3. An objective of the WSD is to support efficient use of multimodal transportation in Waikiki, reflecting the needs of Waikiki workers, businesses, residents, and tourists. It is also to encourage the use of public transit rather than the private automobile and assist in the efficient flow of traffic.

   - Describe how the project will meet this objective.
   - Describe the existing and anticipated arrival modes of workers and customers.
   - Provide a plan showing existing trolley and public bus stops.
   - Describe any proposed improvements to public and private transportation facilities, including stops, shelters, and pull-out lanes.
   - Explain why 495 surplus parking spaces are necessary to support the project.
   - Describe how the parking structure design would change if only the required parking spaces are provided.

4. Explain if the access easement through the adjacent parcel (Tax Map Key 2-6-22: 2) is existing or proposed.

5. The same information appears to be repeated in different sections of the document. More specifically, Sections 2.1, 4.2.3, 4.5.1 and 4.5.2 ("The Project involves..."), Sections 2.8 and 5, and Sections 7.5.1.1 and 8.3.3.3. If possible, these sections should be consolidated.

6. Include the Kalakaua Avenue and Kuhio Avenue building elevations (without the existing building overlay).

7. Show the 20-foot front yard on the ground level plan.

8. Except for subsections (d) and (e), indicate how the project will comply with Section 21-9.80-4 of the LUO related to general requirements and design controls of the WSD.

9. Valet activity should not occur within the City right-of-way. If desired, the valet service should be located within the project site.

10. Describe or illustrate the route of the valet drivers.

11. Loading spaces must enter and exit the site in a forward manner. Show the circulation pattern of the delivery vehicles.

12. Include all attachments listed in the Tree Assessment Report.

13. Provide construction commencement and completion dates.

14. Given project's location in the heart of Waikiki and the proposed reduction in overall square footage, the project should strive to accommodate pedestrians, bicyclists, and transit riders more than automobiles. This includes reducing driveway turning radii to encourage slower vehicular speeds, providing a comfortable and attractive bus stop, providing bicycle parking for patrons near stores and restaurants, providing outdoor seating and pedestrian amenities within the 20-foot front yard, and increasing pedestrian access points.

15. The project should replace the large windowless wall along Kuhio Avenue with a storefront facade to activate the streetscape and enhance the pedestrian experience.

16. Describe the pedestrian experience moving between the parking garage and the project attractions.

17. Address how the public spaces will be activated (e.g., interactive water fountain, quality of the stage/entertainment area, outdoor dining, etc.), as well as how the project will make the upper floor restaurants and retail establishments succeed, given poor visibility into the site from surrounding streets.

18. A permit is required if dewatering effluent is discharged into the City's drainage system.

19. Verify that the project meets the new design criteria of the Rules Relating to Storm Drainage Standards.

20. The Flood Hazard District information and exhibit should reflect the flood district designations of the 2011 Flood Insurance Rate Map. The estimated flood elevation may be closer to 7.0 feet rather than the 5.8 feet as stated in EISPN.

21. The EISPN states that Leadership in Energy and Environmental Design (LEED) principles will be employed when economically feasible. The strategies listed appear very minimal at best. Explain if passive lighting, building thermal efficiency, photovoltaic systems, and separate potable and non-potable water systems are being considered. Although the project reduces the wastewater and potable water demands, the project could further reduce those amounts by implementing other ambitious green concepts.

22. An approved Site Development Division Master Application for sewer connection will be required for sewer capacity reservation and connection to the 18-inch sewer line in Kuhio Avenue.

Should you have any questions, please contact Joyce Shoji of our staff at 768-8032.

Very truly yours,

David K. Tanoue, Director
Department of Planning and Permitting

DKT:nw
cc: Mr. Terry Fitzgerald, TRG IMP LLC

Doc. 905737

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

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E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Mr. David K. Tanoue, Director
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Attention: Ms. Joyce Shoji
Urban Planning Branch

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Tanoue:

Thank you for your letter of January 20, 2012 regarding the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same:

1. "Project Information Summary"

   a. In the Draft EIS, Section 2.4.6 and other affected sections, will be revised to reflect Land Use Ordinance (LUO) text and map changes in Ordinances 11-30 and 11-31, related to the Waikiki Special District (WSD). All references to Resort Commercial Precinct will be eliminated.

   b. The appropriate sections of the Draft EIS will be revised to note that a signage master plan or sign master plan will be processed as a "Zoning Adjustment".

2. "Relationship to Land Use Plans, Policies, and Controls"

   a. In the Draft EIS, Sections 7.5 and 7.5.1.1 through 7.5.2.8, will be revised to reflect a new Section 7.5 "Land Use Ordinance" and a new Section 7.6 "Waikiki Special District Guidelines" (subsequent sections to be

renumbered accordingly). The new Section 7.6 will include EISPN Sections 7.5.1.1 through 7.5.2.8.

b. In the new Section 7.5 of the Draft EIS, compliance with Resort Mixed Use Development Standards will be listed or itemized in a table, including the maximum permitted and proposed floor area and floor area ratio.

3. We believe the Project will further the objective of the WSD to support the efficient use of multimodal transportation in Waikiki and the encouragement for the use of public transit, while at the same time balancing the critical need for additional parking at the Project in order to attract local residents back to the International Market Place and ensure its success over the long term.

a. The Project is being designed assuming that the majority of the people coming to the Project will arrive on foot or use multi-modal transportation. It will take advantage of the existing bus facilities that exist along Kuhio and Kalakaua Avenues. Convenient bike racks will be provided near the Project entries on both streets, with additional racks in the parking garage as needed to satisfy bike-user demand. We are proposing a drop off lane which is designed to accommodate vans and shuttles as well as valet. We believe this lane will not only reduce pedestrian and traffic conflicts, but will also assist the efficient flow of traffic by removing stopping vehicles from the moving lanes of traffic. Those arriving by the many vans and shuttles serving the Waikiki area will find the boarding experience both convenient and safe, encouraging the future use of the same.

The Applicant also intends to implement a Traffic Management Plan (TMP) which will encourage its employees to use public transit and carpools and will encourage and assist tenants in doing the same for their employees. The Applicant will provide within its management office an employee responsible for the TMP who will encourage and coordinate the use of public transit and carpools, and make transit and biking information available to all employees. Transit and biking information will also be made available for all patrons at the customer service desk within the Project.

b. QEL does not have accurate information regarding existing arrival modes of workers and customers.

c. The Draft EIS will include a plan showing the existing trolley and public bus stops which serve the Project.

d. The primary public transportation improvement will be the extended lane proposed along Kuhio Avenue. It is designed to accommodate vans and shuttles as well as valet and will assist the efficient flow of traffic by removing stopping vehicles from the moving lanes of traffic. The lane would be extended the length of the Project along Kuhio Avenue to provide sufficient stacking for vehicles entering the Project's loading and parking facilities opposite the Walina Street intersection. This stacking capacity will also minimize disruptions to the two through lanes used by buses and other traffic. No improvements to bus stops or shelters are anticipated as the Project is adequately served by existing facilities located nearby. On Kuhio, the nearest stops on the makai side of the street are on the blocks before and after the Project; both of which are strategically placed by TheBus for appropriate separation and ease of service. The Project will not adversely affect the bus operations at those stops. The bus stops on the mauka side of Kuhio and on Kalakaua are outside of the traffic flow servicing the Project and will not be impacted. Loading improvements will be made in private access easements serving the Project allowing delivery vehicles to load away from public streets further improving traffic conditions on both Kalakaua and Kuhio.

e. We believe it critical to the long-term success of a revitalized International Market Place that the Project attract not only tourists and immediately nearby residents, but all residents of the Island. The Project is being designed with that objective in mind. In addition to a tenant mix which will include a variety of stores not found elsewhere in Hawaii, we intend to provide a unique dining and entertainment experience on the third level with a cluster of restaurants providing outdoor dining in view of the Exceptional Tree canopy as well as cultural and other entertainment venues reminiscent of the heyday of the IMP. We understand that most tourists will walk to the International Market Place. In the interest of attracting a broader market of local residents, however, we have tried to strike a balance between the number of stalls that would be required for a shopping center outside of Waikiki versus the parking requirements for a shopping center in Waikiki. Were this Project located in a typical suburban area, the likely parking demand would be between 1,600 and 1,800 cars (parking ratio of 4.5 to 5.0 spaces per 1,000 square feet of gross leasable area). The Royal Hawaiian shopping center has 611 stalls serving 310,000 square feet of gross leasable area (1 stall per 507 square feet or 1.98 parking ratio). The Applicant's proposal for 776 parking stalls for 355,000 square feet of gross leasable area (1 stall per 457 square feet or 2.19 parking ratio) is approximately the same, and we think appropriate. Since we will not be able to add needed parking once the Project is built, we have sized the

parking consistent with our stated objective of attracting local residents back to IMP in order to assure the Project's long-term success.

f. The parking and layout of parking as shown on the plan represents the Applicant's professional judgment of what is required to make the Project successful. While no reduction is contemplated, the top two layers of parking hypothetically would be eliminated in order to reduce the parking to the required spaces only. This would have the unintended consequence, however, of taking proximate parking away from the third level restaurants – one of the key design elements intended to ensure the success of this upper level.

4. The access easement through the adjacent parcel (Tax Map Key 20-6-22: 2) is an existing easement.

5. These sections are part of the required EISPN documentation. It is possible to consolidate the information in just the first section that appears and reference readers back to that section for the information, but parties reviewing the document may find the document more frustrating to read. In our experience, EIS accepting authorities, including the DPP, oftentimes asked that information simply be repeated rather than referencing the reader back to an earlier section.

6. The Draft EIS will include Kalakaua Avenue and Kuhio Avenue building elevations without the existing building overlay.

7. The Draft EIS will show the 20-foot front yard on the ground level plan.

8. The Draft EIS will discuss the Project's compliance with Section 21-9.80-4 of the LUO, except for subsections (d) and (e), in the new Section 7.5.

9. We understand the City's concern regarding valet activities within public right of way. The design as shown is coupled with a sidewalk variance and easement on private property which together create a condition which provides safety for pedestrians and improves overall traffic flow in the public right of way. An alternative design would be to have the valet occurring only on private property and no sidewalk easement which has the potential to interrupt pedestrian flow along the sidewalk, as well as potentially create vehicle back-ups and delays in the through lanes of Kuhio. With the proposed design, the sidewalk section along Kuhio will be as wide or wider than the existing condition with the widest sections occurring at the Ewa end and along the entryway into the Project. Those sections will be wide enough to accommodate seating and landscaping as well. In addition, while the concept drawing included in the EISPN uses the label "Valet Drop Off",

it is designed to accommodate vans and shuttles as well as valet, and will assist the efficient flow of traffic by removing stopping vehicles from the moving lanes of traffic. The lane would also be extended the length of the Project along Kuhio Avenue to provide sufficient stacking for vehicles entering the Project's loading and parking facilities opposite the Walina Street intersection. This stacking capacity will also minimize disruptions to the two through lanes used by busses and other traffic.

10. Please see the attached Valet Circulation illustration which will also be included in the Draft EIS. The circulation pattern is designed to minimize use of public right of way with the added benefit of valet drivers making all right turns when parking or delivering vehicles. No u-turns or backing up is required or permitted which further enhances pedestrian safety on the sidewalk and traffic flow on Kuhio's through lanes.

11. Please see the attached Service Truck Circulation illustration which shows how vehicles will maneuver within private access easements into loading facilities. All loading for the Project occurs without the use of public right of way. Duke's Lane is a private access easement that provides vehicular access to only two lots: the Project and the Holiday Inn Waikiki Beachcomber Hotel. Delivery vehicles will enter and exit the public rights of way in a forward fashion at all times.

12. The Draft EIS will include all attachments listed in the Tree Assessment Report.

13. It is difficult to pinpoint specific construction commencement and completion dates as they are dependent upon the timing for obtaining required permits and approvals. Section 4.4 of the EISPN notes that construction is anticipated to begin in 2013 and will take approximately 24 months to complete. If started in 2013, the Project would open in 2015. A statement to that effect will be added to the Draft EIS.

14. We understand that the large majority of visitors to the Project will arrive by means other than automobiles, and that most of those will be on foot. The Project is being specifically designed to accommodate pedestrians, bicycles, and transit riders. The driveway entrances are designed with minimum radii and minimum widths to allow for convenient vehicular and loading access while permitting convenient pedestrian crossing. It will take advantage of the existing bus facilities that exist along Kuhio and Kalakaua Avenues. Convenient bike racks will be provided near the Project entries on both streets, with additional racks in the parking garage as needed to satisfy bike-user demand. Seating will be provided throughout the Project as part of the amenities package of the facility. This will include seating within the 20 foot front yard. The Project design provides a broad

and inviting pedestrian path of travel between Kuhio and Kalakaua which will be a striking improvement over the existing site conditions and enhance the pedestrian connectivity makai-mauka at the very heart of Waikiki and in attractive open air environment with gathering places along the way.

15. We understand the importance of enlivening and activating the pedestrian experience along Kuhio Avenue. We want and expect the Project to be a catalyst for the redevelopment of properties up and down Kuhio. Between storefront, architecture, landscaping, sidewalk amenities, lighting, and other design features and considerations, we will bring forward a design for approval which will strike an appropriate balance for the Project and the community, and which will enhance the Kukio streetscape in a dramatic way.

16. All levels of the parking structure deliver patrons to the third level dining terrace. As one enters the development from the structure, they will have an immediate panoramic view makai and an inviting view of the entire dining terrace and Exceptional Tree canopy. If they choose to descend to the street level, they will pass through an attractive, well-landscaped, outdoor setting before arriving in one of the three large courtyards.

17. It is too early to provide specifics regarding the amenities within the Project. The design intent is to provide an inviting park-like setting with landscaped courtyards, water features, canopy trees and gathering places to accommodate cultural programming and education. The Exceptional Tree will become a centerpiece of one of the three large court areas and the tree's canopy will be a real and unique part of the visitor experience on the second and third levels. For the many pedestrians along Kalakaua and Kuhio, we are providing an inviting entry with sight lines to the interior space which will entice the curious. The vertical transportation within the Project is placed to make an easy circuit up to and around the second and third levels. The dining terrace on the third level with its combination of multiple restaurants, open-air seating, and views of the sky, tree canopies and entertainment areas will make it an attraction unlike anything else in Waikiki and one well worth seeking out. The parking structure is designed above the retail in order to deliver all parking patrons to the third level with direct access to the dining terrace and the ability to shop the Project from top to bottom and back.

18. The Draft EIS will note that a permit will be required if dewatering effluent is discharged into the City's drainage system.

19. The Draft EIS will verify that the Project meets the new design criteria of the Rules Related to Storm Drainage Standards.

20. The Draft EIS will update the Flood Hazard District information based on the 2011 Flood Insurance Rate Map.

21. It is our intention to design, maintain, and operate the Project employing best practices for energy efficiency and environmental sustainability for projects of its kind. The new buildings will meet or exceed the energy efficiency code requirements. We will review all applicable LEED rating systems, use the certification standards as guidelines, and pursue certification when financially feasible. The 'open air' nature of the center will reduce our projected energy consumption from the lighting and mechanical systems. Passive lighting will be maximized and the makai to mauka orientation of the pedestrian open spaces will take advantage of the trade wind circulation. We intend to incorporate high performance building skins and roofing in our project to maximize our building thermal efficiency. We will explore the use of photovoltaic panels above the parking deck as a financial and environmental strategy – but also for screening and shading reasons. We will implement low-flow plumbing fixtures, explore waterless urinals, incorporate efficient landscape irrigation systems, and explore the use of non-potable water in our planting areas in an effort to further reduce wastewater and potable water demands. We will reduce our material waste through effective construction and operational recycling programs. Green Tenant Design & Operation Guidelines will be issued to all of our tenants to encourage ongoing energy efficiency and environmental measures.

22. The Draft EIS will note that the Applicant will be applying for a Site Development Division Master Application for sewer application to reserve sewer capacity and allow connection to the 18-inch sewer line in Kuhio Avenue.

Your comments and this response will be included in the Draft EIS.

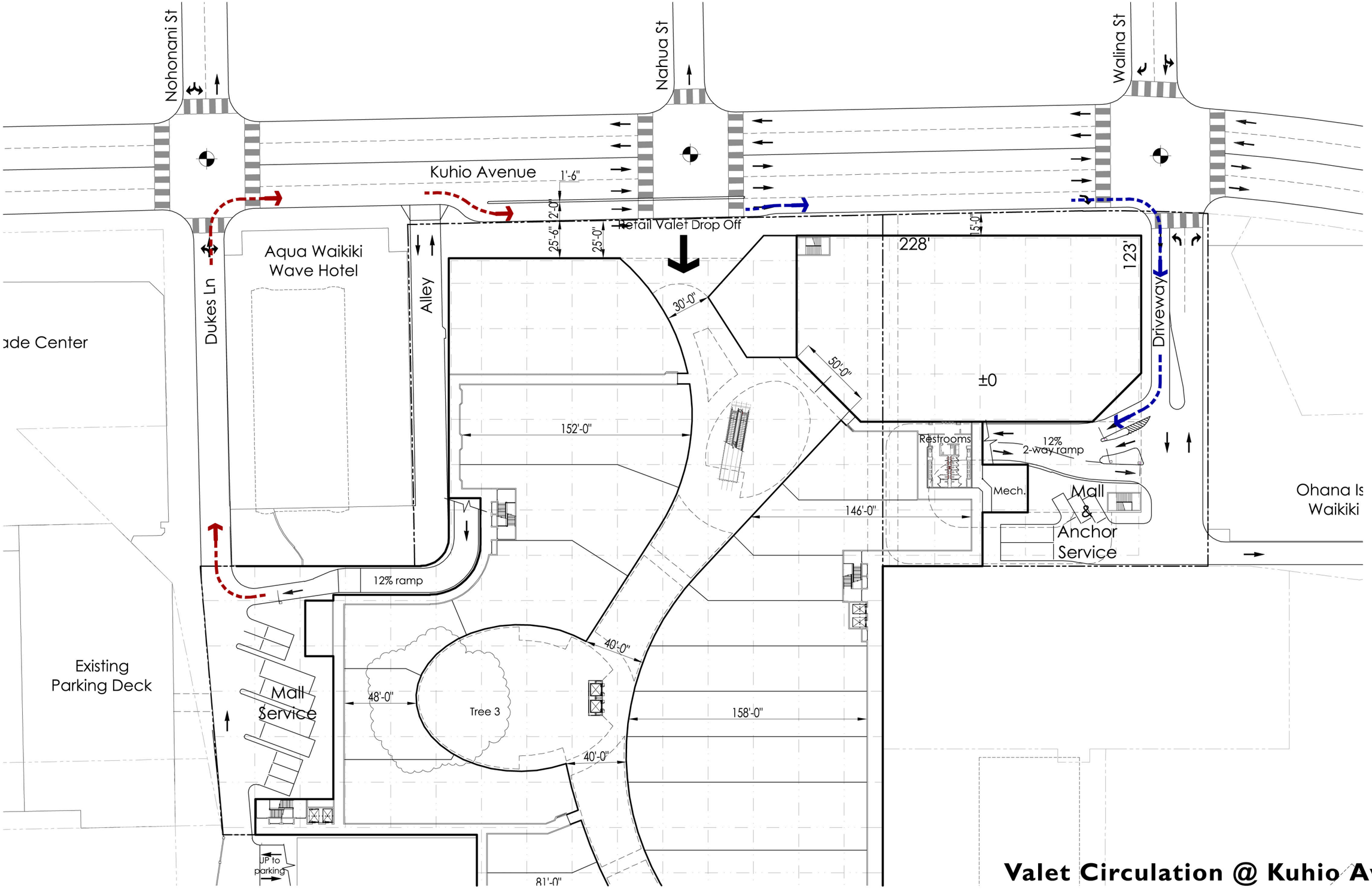
Very truly yours,

Keith Kurahashi

Keith Kurahashi

attachs.

cc: Department of Planning and Permitting
Queen Emma Land Company
TRG IMP LLC

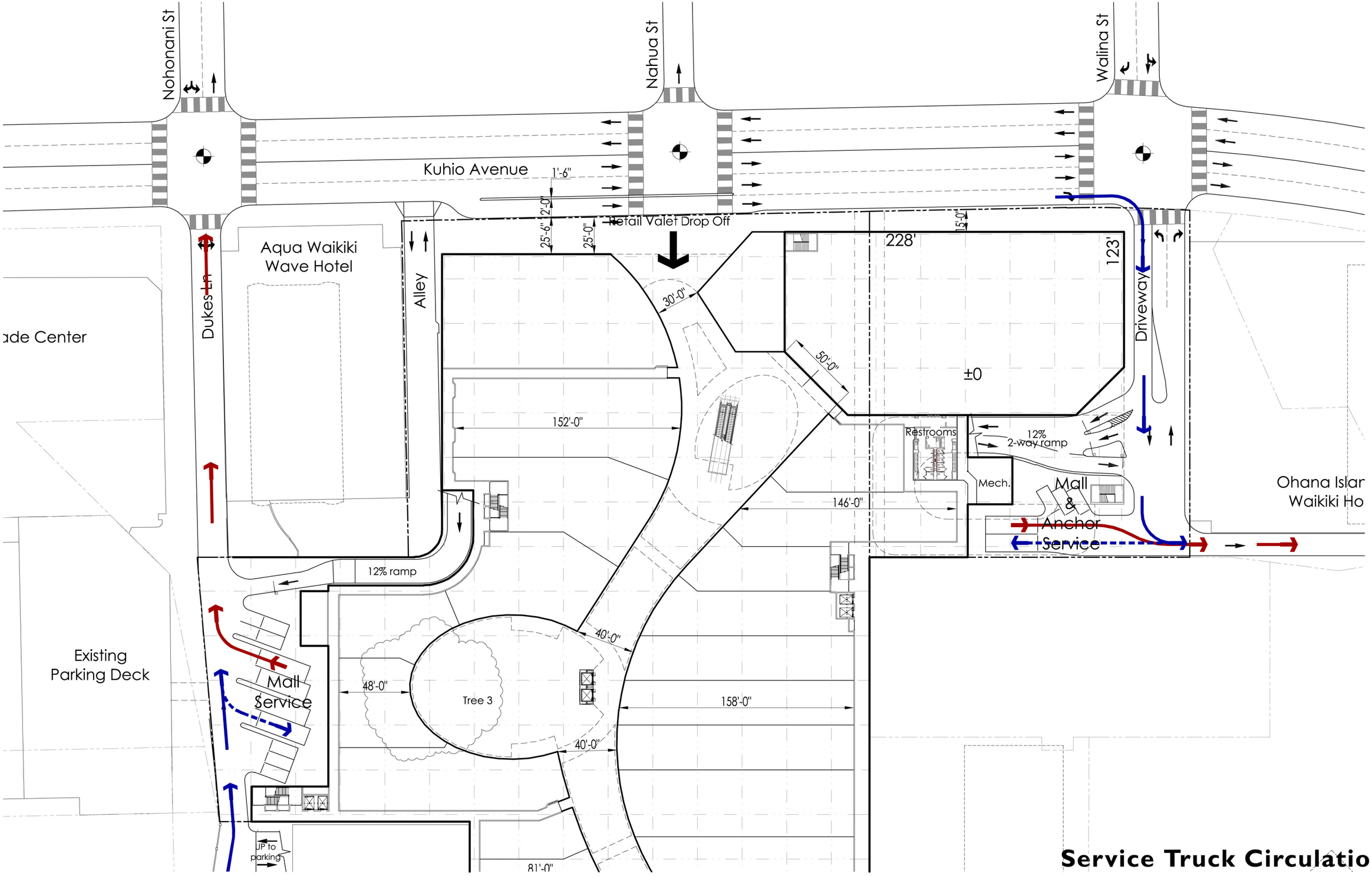


Valet Circulation @ Kuhio Ave.

NORTH

0 30' 60' 120'

Scale: 1"=60'-0"



Service Truck Circulation

NORTH

0 30' 60' 120'

Scale: 1"=60'-0"

MIRAMAR
AT WAIKIKI

January 20, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawai`i 96822

Ms. Joyce Shoji
Department of Planning & Permitting
City & County of Honolulu
650 South King Street
Honolulu, Hawai`i 96813

RE: EISPN for International Market Place Revitalization Project

Dear Mr. Kurahashi and Ms. Shoji:

Thank you for the opportunity to provide input into the preparation of a draft environmental impact statement for the proposed International Market Place Revitalization project.

As accurately noted in the Environmental Impact Statement Preparation Notice ("EISPN"), the ground lease for the Miramar at Waikiki hotel ("Miramar") has been extended, and it is the desire of both Miramar and the Queen Emma Land Company that the hotel continue to operate and generate income for as long as possible pending the commencement of the redevelopment project.

Archaeological Inventory Survey

We note that the archaeological inventory survey ("AIS") will be conducted while Miramar continues to operate as a full-service hotel serving hundreds of guests daily. Inasmuch as the AIS will include digging a number of trenches on the Miramar site, we ask that those conducting the AIS and the regulators be keenly cognizant, and considerate, of the active status of the hotel. We are especially concerned that the AIS activities do not pose a health or safety hazard to any of our guests or employees.

The Final Archaeological Inventory Survey Plan indicates that if any significant cultural resources and/or human remains are identified, SHPD will be notified immediately, and the remains shall not be disturbed further. We would like clarification, and assurance, that such finds may be re-buried in place and the ground restored in such a way as will enable Miramar to carry on normal operations, pending the commencement of

2345 Kuhio Avenue • Honolulu, Hawaii 96815-2996 • Phone (808) 922-2077 • Fax (808) 926-3217

redevelopment. Specifically, we are concerned that having open trenches may pose risks to human health and safety, or curtail our ability to operate normally.

We also note that some of the trenches will be located in food and beverage service areas. Again, we would like clarification and assurance that excavation activities will be in compliance with all relevant Department of Health regulations and that curtailment of normal operations will be limited.

Notice of Progress of Redevelopment

As the EISPN indicates, approximately 100 people employed by Miramar will lose their jobs with the closure of the hotel. In these stressful economic times when replacement employment opportunities it may be difficult for many of these displaced workers to obtain, we must stress to the developer the importance of continually informing us of progress and timing of the redevelopment in order that we may be able to convey that information to our employees.

Renovation of Existing Structures

We feel it is necessary to make the point that while the International Market Place and Town Center may be characterized as dated or nearing the end of their useful lives, we do not feel this is an accurate depiction of the Miramar property. Renovation and modernization throughout the life of the property has ensured that the hotel has remained competitive in today's marketplace. If the revitalization project were not to move forward, the Miramar could conceivably continue operations indefinitely.

Again, thank you for the opportunity to provide input at this stage of the EIS process.

Sincerly,

Ted Sakai
General Manager
Miramar At Waikiki
2345 Kuhio Avenue
Honolulu, HI 96815
(808)-926-8534

cc: Wayne Costa

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Mr. Ted Sakai
General Manager
Miramar At Waikiki
2345Kuhio Avenue
Honolulu, Hawaii 96815

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project

Dear Mr. Sakai:

Thank you for your letter of January 20, 2012 regarding the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same:

Archaeological Inventory Survey

We are aware of the active status of the hotel. TRG and its contractors have and will continue to work diligently with you and take appropriate measures to protect the health and safety of your guests and employees as well as minimize the impact on the operation of the hotel.

Cultural Surveys Hawaii has confirmed to us that in the event of a find of a significant cultural resource or human remains that the excavation will be backfilled as normal with minimal delays and that re-surfacing will proceed as normal.

If restricting pedestrian traffic over any such find can be accomplished without causing safety concerns and with minimal adverse impact to pedestrian traffic, commerce, and on-going operations we may request Miramar consideration of the placement of a planter or some furniture re-arrangement over the immediate location of any find of cultural concern. Not only are safety concerns paramount, but we regard any significant adverse impact to pedestrian traffic, commerce, and on-going operations as sufficient grounds for no departure from normal hotel circulation patterns.

We have every expectation that no trench will need to be worked on or left open for more than 8 hours total before it is backfilled to near the surface.

With regard to those few trenches located in food and beverage service areas, every precaution will be taken to assure compliance with Department of Health regulations and we will take appropriate measures to limit curtailment of normal operations. We will share with you our detailed schedule of trenching operations and will coordinate with you daily on our progress once the work commences.

Notice of Progress of Redevelopment

It is our intent to work collaboratively with you throughout the redevelopment approval process. We will keep you informed of the Project status on a regular basis and work with you directly on matters which affect the hotel and the timing of the redevelopment.

Renovation of Existing Structures

We will appropriately modify the Draft EIS to eliminate references to the Miramar as being at the end of its useful life.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRG IMP LLC

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

PETER B. CARLISLE
MAYOR

LORI M.K. KAHIKINA, P.E.
ACTING DIRECTOR

CHRIS TAKASHIGE, P.E.
DEPUTY DIRECTOR

January 23, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

International Market Place Revitalization Project

Thank you for the opportunity to review and comment on this project. The Department of Design and Construction has no comments.

Should you have any questions, please contact me at 768-8480.

Sincerely,

for Lori M.K. Kahikina, P.E.
Director

LMMK:pg(445478)

Cc: DPP
TRG IMP LLC

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

BUS. (808) 988-2231
FAX. (808) 988-1140
E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Ms. Lori M.K. Kahikina, P.E., Director
Department of Design and Construction
650 South King Street, 11th Floor
Honolulu, Hawaii 96813

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Ms. Kahikina:

Thank you for your letter of January 23, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the Department of Design and Construction has no comments to offer.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

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

In reply, please refer to:
EMD/CWB

01021PDCL.12

January 23, 2012

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for International Market Place Revitalization Project Honolulu, Island of Oahu, Hawaii

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject document and offers these comments on your project. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: http://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf.

1. Any project and its potential impacts to State waters must meet the following criteria:

   a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.

   b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.

   c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2. You may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for an NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

   a. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on

different schedules under a larger common plan of development or sale. This includes areas used for a construction base yard and the storage of any construction related equipment, material, and waste products. An NPDES permit is required before the start of the construction activities.

b. Hydrotesting water.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at: http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html.

3. For other types of wastewater not listed in Item No. 2 above or wastewater discharging into Class 1 or Class AA waters, an NPDES individual permit will need to be obtained. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at http://hawaii.gov/health/environmental/water/cleanwater/forms/environmental/water/cleanwater/forms/indiv-index.html.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 Water Quality Certification are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation.

If you have any questions, please visit our website at: http://www.hawaii.gov/health/environmental/water/cleanwater/index.html, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,

ALEC WONG, P.E., CHIEF
Clean Water Branch

DCL:ml

c: DOH-EPO #11-275 [via email only]
Ms. Joyce Shoji, CCH-DPP (via fax 768-6041 only)
Mr. Terry Fitzgerald, TRG IMP LLC

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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2752 WOODLAWN DRIVE, SUITE 5-202
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E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Mr. Alec Wong, P.E., Chief
Clean Water Branch
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Wong:

Thank you for your letter of January 23, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same:

1. The proposed development will comply with the requirements of Title 11, Chapter 54 of the Hawaii Administrative Rules regarding Water quality standards.

2. The applicant will obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater/storm water into State surface waters and as needed for storm water associated with certain construction activities, or hydrotesting water. Requirements of the Notice of Intent form and NPDES permit will be met, including submittal of the NPDES application at least 30 calendar days before the start of construction activities.

3. Should other types of wastewater not listed in item 2 above be generated by the Project or discharge of wastewater into Class 1 or Class AA waters be proposed, an NPDES permit application will be submitted at least 180 calendar days before the commencement of the discharge.

4. All discharges related to the Project construction will meet State Water Quality Standards. The Applicant is aware of the potential penalties for any violations.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

NEIL ABERCROMBIE
GOVERNOR

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

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

IN REPLY REFER TO:
STP 8.0720

RECEIVED
'12 JAN 31 A10:28
DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

January 23, 2012

Ms. Joyce Shoji
Planner
City and County of Honolulu
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Ms. Shoji:

Subject: International Market Place Revitalization Project Environmental Impact Statement Preparation Notice

Thank you for requesting the State Department of Transportation's (DOT) review of the International Market Place Revitalization Project (IMPRP). The project will include replacing all existing buildings and structures on the 5.982 acre parcel with a new retail, dining and entertainment center.

DOT Highways Division is still conducting its review of the subject Environmental Impact Statement Preparation Notice (EISPN) and the traffic impact analysis report (TIAR) and will provide additional comments as necessary.

DOT appreciates the opportunity to provide these interim comments. If there are any questions, please contact Mr. Elton Teshima of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7978.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
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E-Mail: kkurahashi@hawaii.rr.com

March 6, 2012

Glenn M. Okimoto, Ph.D., Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Okimoto:

Thank you for your letter of January 23, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant understands that the State Department of Transportation, Highways Division is still conducting its review of the EIS Preparation Notice and the traffic impact analysis report (TIAR) and will provide additional comments as necessary.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

NEIL ABERCROMBIE
GOVERNOR

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

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

IN REPLY REFER TO:
STP 8.0757

February 29, 2012

RECEIVED
'12 MAR -7 A11:16
DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLU

Ms. Joyce Shoji
Planner
City and County of Honolulu
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Ms. Shoji:

Subject: International Market Place Revitalization Project
Environmental Impact Statement Preparation Notice (EISPN)

The State Department of Transportation (DOT) previously commented on the EISPN in its letter STP 8.0720 dated January 23, 2012 (attached), and now offers the following supplemental comments.

The DOT Highways Division completed its review of the subject project and has concluded that the Revitalization Projects is not expected to have a significant impact on the State highways facilities.

DOT appreciates the opportunity to provide these supplemental comments. If there are any questions, please contact Mr. Elton Teshima of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7978.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation

Attachment: Ltr. STP 8.0720 td. 1/23/12

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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March 22, 2012

Glenn M. Okimoto, Ph.D., Director
Department of Transportation (DOT)
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Attention: Mr. Elton Teshima
DOT Statewide Transportation Planning Office

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Okimoto:

Thank you for your letter of February 29, 2012 regarding the Environmental Impact Statement (EIS) Preparation Notice for the International Market Place Revitalization Project (Project).

The applicant appreciates your determination that the Project will not have a significant impact on State Highways facilities.

Your letter and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRB IMP LLC

2012 Storm Water Quality Branch Comments

2/17/12 International Market Place Revitalization Project
TMK: 2-6-22: 36-39, 43
EIS Preparation Notice
Queen Emma Land Company

Pp 58: Sec 8.6.7, Drainage and Storm Water Quality: Note that the DPP Rules Related to Storm Drainage Standards are scheduled to be revised in 2012 to include Low Impact Development (LID) measures as required by the City's MS4 permit.

Pg 13 of the Preliminary Engineering Report : As noted above, the City's MS4 permit, DPP's Rules Related to Storm Drainage Standards are scheduled to be revised this year to include Low Impact Development (LID). It is anticipated that developments and redevelopments that disturb five or more five acres, will be required treat rainfall events up to 1-inch with LID techniques through infiltration, evapotranspiration or reuse, if feasible.

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
2752 WOODLAWN DRIVE, SUITE 5-202
HONOLULU, HAWAII 96822

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March 22, 2012

Mr. Timothy Steinberger, Director
Department of Environmental Services
City and County of Honolulu
1000 Uluohia Street, Suite 308
Kapolei, Hawaii 96707

Attention: Storm Water Quality Branch

Subject: Environmental Impact Statement Preparation Notice
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Steinberger:

Thank you for your email of February 22, 2012, relating to comments from the Storm Water Quality Branch, regarding the Environmental Impact Statement Preparation Notice (EISPN) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

We offer the following responses (following the order set forth in your letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same:

1. We will add the following to Sec 8.6.7 of the Draft EIS:

   "We understand that the Department of Planning and Permitting ("DPP") Rules Related to Storm Drainage Standards ("Rules") are scheduled to be revised in 2012 to include Low Impact Development (LID) measures as required by the City's MS4 permit."

2. Our engineering consultant, Wilson Okamoto Corporation, will update the Preliminary Engineering Report to address your comment.

Your comments and this response will be included in the Draft EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRG IMP LLC