FINAL ENVIRONMENTAL IMPACT STATEMENT

INTERNATIONAL MARKET PLACE REVITALIZATION PROJECT

Appendix 16

DEIS/Agency Comment Letters and TRG's Response Letters

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:
File:

LUD - 1 2 6 022 036 etc-ID998
DEIS Intl Market Pl Rev Proj

May 31, 2012

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

Dear Mr. Kurahashi:

Subject: Draft Environmental Impact Statement
International Market Place Revitalization Project
Kalakaua and Kuhio Avenue, Waikiki, Honolulu, Oahu 96815
TMKs (1) 2-6-022: 036, 037, 038, 039 and 043

Thank you for allowing us the opportunity to review and provide comments for the Draft Environmental Impact Statement for the subject project.

It is our understanding that the project will be served by the City and County sewer collection system; therefore, we have no comments to offer at this time. We encourage the developer to work with the City and utilize recycled water for irrigation and other non-potable water purposes such as dust control, open spaces or landscaping areas.

All wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." Should you have any questions, please contact the Planning & Design Section of the Wastewater Branch at 586-4294 or fax to 586-4300.

Sincerely,

SINA PRUDER, P.E., ACTING CHIEF
Wastewater Branch

LM:cle

c: DOH's Environmental Planning Office (12-057)
City & County of Honolulu's Planning & Permitting Office

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

July 3, 2012

Mr. Sina Pruder, P.E., Acting Chief
Wastewater Branch
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

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

Dear Mr. Pruder:

Thank you for your letter of May 31, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate that you have no comments to offer at this time based on our proposal to connect and be served by the City and County municipal sewer system. The applicant will explore the use of non-potable water and/or drip irrigation systems in planting areas in an effort to further reduce potable water demands.

All wastewater plans will conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems."

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

HISTORIC HAWAI'I FOUNDATION

May 25, 2012

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

RE: Draft Environmental Impact Statement
International Marketplace Revitalization Project
2290, 2318, 2330 and 2332 Kalākaua Avenue; 2301 and 2345 Kūhiō Avenue
Waikīkī, O'ahu, Hawai'i

Dear Mr. Kurahashi:

Thank you for referring the above project to Historic Hawai'i Foundation for review and comment on the Draft Environmental Impact Statement. Since 1974, Historic Hawai'i Foundation (HHF) has been a statewide leader for historic preservation. HHF's mission is to preserve and encourage the preservation of Hawaii's historic buildings, sites, objects and communities.

The proposed project is to demolish the International Marketplace, the Miramar Hotel, and the Waikīkī Town Center on a 5.982 acre site in Waikīkī, roughly bounded by Kūhiō Avenue, 'OHANA Waikīkī East Hotel, Sheraton Princess Ka'iulani Hotel, Kalākaua Avenue, Macy's and Waikīkī Beachcomber Resort, the Aqua Waikīkī Wave hotel, and Duke's Lane. The cleared site would then be redeveloped with a commercial center to include retail, dining, entertainment and parking. The project proposes to include 390,000 square feet of commercial space, generally three levels in height, and a seven story retail and parking structure at the mauka side.

Historic and cultural resources are addressed in Appendix 5, Final Archaeological Inventory Survey Plan (Cultural Surveys Hawai'i); Appendix 6, Preliminary Evaluations of existing structures for historic significance (Mason Architects for WCIT Architecture); and Appendix 15, Cultural Impact Assessment (Cultural Surveys Hawai'i).

The architectural report indicates that:

- Most of the individual buildings in the International Marketplace (IMP) were constructed beginning in 1956, with additions and alterations in 1963, 1967, 1970, 1971, 1979 and through 1987. The history of alterations is not well documented, but all have been altered to a greater or lesser extent.
- The Miramar Hotel was constructed in 1962 (original four-story building, mostly parking) and 1970 (hotel). It is associated with designers Frank Slavsky and Harold Whitaker, Alfred Yee Associates as structural engineers, and possibly association with development trends that included advances in high rise building and fire codes.
- The Waikīkī Town Center was built in 1980 and is less than 50 years old. There is a question of whether the mechanical garage might be of exceptional significance, which would need to be determined through further research.

Although the architectural survey did not reach any determinations as to whether any of the existing structures may be eligible for the National Register of Historic Places, the State Historic Preservation

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Division issued an opinion that the International Marketplace "still retains its historic location, design, setting, materials, feeling and association to a degree that makes it eligible for the National Register of Historic Places" (Letter from Angie Westfall, SHPD, to Joyce Shoji, DPP, dated January 9, 2012). The DEIS indicates that a follow-up meeting between SHPD and the design team held on January 13 outlined additional discussion on mitigation measures, but that no consensus has been reached.

HHF offers the following comments and recommendations related to historic and cultural properties:

1. HHF recently commissioned and completed a context study into the era of Hawai'i's mid-20th century development, roughly 1937-1967, to help with further assessments of buildings and structures associated with the more recent past. The Hawai'i Modernism Context Study is not a definitive inventory of all historically or architecturally significant properties of this era, but it provides background and contextual information about this period that may be useful as a tool for evaluating the impacts from development proposals that affect properties as they attain the age of 50 years.

   Based on both the Hawai'i Modernism Context Study and the preliminary findings of the architectural inventory survey, HHF believes that the Miramar Hotel and the Waikīkī Town Center are likely not eligible for the State or National Registers of Historic Places. However, the preliminary findings indicate that these structures may be able to yield more information about innovations related to engineering or construction techniques associated with the period.

   Therefore, HHF recommends that further research be conducted into the mechanical garage/car park lift at the Waikīkī Town Center, with the intention of documenting its history and any exceptional significance that it displays. If salvage or reuse is found to be feasible, this should be considered.

   HHF also recommends that further research into the history of high rise construction and changing building and fire codes be documented, such as responses that may have been suggested by the Miramar's 17th floor fire during construction. The historical research should be provided to various archives, researchers and repositories as a resource for future architectural histories related to the mid-century period.

   Any historic preservation agreements should include specific ways in which these research projects may be scoped and their findings disseminated for the greatest possible usefulness.

2. While HHF agrees with SHPD's opinion that the International Marketplace retains its historic location, setting, feeling and association, we are concerned that the overall level of ongoing redesign, new construction and alteration has significantly altered the historic design and materials. It is unclear whether the current structures retain sufficient integrity to make them eligible for the National Register of Historic Places.

   The developer has the option of either seeking an official determination from the Keeper of the National Register about the eligibility of the IMP site, or to proceed on the assumption that the site does meet the criteria for both significance and integrity and to develop a mitigation plan and agreement to address the adverse effect to the property.

   If the project team decides to proceed directly to developing a preservation agreement, HHF requests to participate in the discussions about appropriate ways to identify, preserve and interpret the significant characteristics and associations. These could include measures that are integrated into the design, operations, interpretive materials, further study or research, or other creative mitigation.

   HHF supports the preliminary concepts that include:

- Retention, repair and re-installation of the International Marketplace sign;
- Collecting oral histories, stories and research on the social and cultural history of IMP to be shared through the site's educational and interpretative signs, books, tours and/or film;
- Incorporating historical, cultural and educational features that tell the story of Queen Emma, King Kamehameha IV, Prince Albert Edward and their significant contributions to the people of Hawai'i;
- Use of building design, landscaping, water features and streetscape improvements to convey a Hawaiian sense of place rooted in the historic associations and characteristics.

3. Other historic and cultural properties identified in the DEIS include known Native Hawaiian burials and a high likelihood for additional discoveries based on prehistoric use and known cultural practices associated with Waikīkī, as well as other artifacts and historic archaeology.

   HHF concurs with the proposed mitigation to complete the Archaeological Inventory Survey and Monitoring Plan, develop a Burial Treatment Plan to be approved by the State Historic Preservation Division and O'ahu Island Burial Council, and to implement field work in accordance with these plans.

4. In addition, the IMP site includes a banyan tree listed on the Register of Exceptional Trees, which is proposed to be preserved and integrated into the overall site plan, design and open space of the new development. Additional banyan and monkey pod trees are also to be retained. Other trees are proposed for relocation or removal, with details to be developed in subsequent evaluations.

   HHF concurs with the proposal to retain the Exceptional Tree and encourages the retention and integration of as many of the remaining mature and healthy trees as possible.

Thank you for the opportunity to comment. We look forward to further discussions about potential mitigation measures for any impacts to historic properties at the International Marketplace Revitalization Project.

Very truly yours,

Kiersten Faulkner

Kiersten Faulkner, AICP
Executive Director

Copies:

Department of Planning and Permitting, Urban Design Branch
Ms. Angie Westfall, Hawai'i State Historic Preservation Division (PDF)
Mr. Les Goya, Queen Emma Land Company (PDF)
Mr. Robert Iopa, WCIT Architecture (PDF)
Mr. Glenn Mason, Mason Architects, Inc. (PDF)

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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July 3, 2012

Ms. Kiersten Faulkner, AICP
Executive Director
Historic Hawaii Foundation
680 Iwilei Road, Suite 690
P.O. Box 3378
Honolulu, Hawaii 96817

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

Dear Ms. Faulkner:

Thank you for your letter of May 25, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

In response to your comments and recommendations related to historic and cultural properties, we offer the following (in the same order as set forth in your letter):

1. We acknowledge HHF's belief that, based on both the Hawai'i Modernism Context Study and the preliminary findings of the architectural inventory survey, the Miramar Hotel and the Waikiki Town Center are likely not eligible for the State or National Registers of Historic Places.

   As you suggest, we will conduct further research into the mechanical garage/car park lift at the Waikiki Town Center to document its history and any exceptional significance it displays. Due to the current plan and design, however, the salvage or reuse of the same will not be feasible. We will also research the fire at the Miramar's 17th floor to see if any discussions led to changing of the building or fire codes.

   Our research will be provided to various archives, researchers and repositories, including any that you would recommend. While historic preservation is not planned for the structures themselves, we will be working with the State Historic Preservation Division (SHPD) to develop a Programmatic Agreement (PA) or Memorandum of Agreement (MOA) related to the historical aspects of the property. We will endeavor to include specific ways for any research developed to be disseminated for the greatest possible usefulness.

2. As we work with SHPD in developing an appropriate PA or MOA, we will consult with you about appropriate ways to identify, preserve and interpret significant historical

characteristics and associations of the property. We believe our proposed design of the project is consistent with the preliminary concepts you noted and look forward to sharing the same with you.

3. We appreciate your concurrence with our plans to complete the Archaeological Inventory Survey and Monitoring Plan, develop a Burial Treatment Plan to be approved by SHPD and O'ahu Island Burial Council, and to implement field work in accordance with these plans.

4. We also appreciate your concurrence with our proposal to retain the Exceptional Tree as we intend to embrace it as part of the overall project's design. Our proposed design will also retain and integrate other mature trees on the property, and we will look for opportunities to retain and integrate others consistent with the tree assessment report included in the EIS.

The applicant looks forward to further discussions with your office. Your letter and this response will be included in the Final EIS.

Very truly yours,

Keith Kurahashi

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

Hawaiian Electric Company
Engineering Department
PO Box 2750 • Honolulu, HI 96840

May 24, 2012

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

Dear Mr. Kurahashi:

Subject: **International Market Place Revitalization Project**

Thank you for the opportunity to comment on the proposed project. Hawaiian Electric Company has no objections or comments at this time to the proposed project. HECO has existing easements and facilities on the subject property, we will need to continue the easements in perpetuity for access and maintenance of our facilities.

We appreciate your efforts to keep us apprised of the subject project in the planning process. As the International Market Place Revitalization project comes to fruition, please continue to keep us informed. Further along in the design, we will be better able to evaluate the effects on our system facilities.

If you have any questions, please call me at 543-7245.

Sincerely,

Rouen Q. W. Liu
Permits Engineer

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

July 3, 2012

Mr. Rouen Q.W. Liu
Permits Engineer
Engineering Department
Hawaiian Electric Company
P.O. Box 2750
Honolulu, Hawaii 96840

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

Dear Mr. Liu:

Thank you for your letter of May 24, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project) indicating that Hawaiian Electric Company (HECO) has no objections or comments at this time to the proposed project. The applicant understands that HECO has existing easements and facilities on the subject property and will need to work with HECO to extend, modify and/or relocate the same as needed for access and maintenance of your facilities.

The applicant will keep you informed as the applicant moves through the planning process and as building permits are processed.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRG 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:
DOH/CWB

05021PMR.12

May 23, 2012

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

Dear Mr. Kurahashi:

SUBJECT: Comments on the Draft Environmental Impact Statement (EIS) for the 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 has no comments at this time. The DOH-CWB provided comments on the EIS Preparation Notice for this project (Letter No. 01021PDCL.12, dated January 23, 2012).

Please note that our review is based solely on the information provided in the subject document and its compliance with 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://hawaii.gov/health/environmental/env-planning/wqm/landuse/landuse.html/CWB-standardcomment.pdf.

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

MR:jst

c: DOH-EPO # 12-057 [via e-mail only]
Ms. Joyce Shoji, CCH-DPP (via fax 768-6041 only)

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July 3, 2012

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

Subject: Draft Environmental Impact Statement
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 May 23, 2012 regarding the Draft Environmental Impact Statement for the International Market Place Revitalization Project (Project). We appreciate that you have no additional comments at this time.

In response to your Branch's Standard Comments, we offer the following:

Permit Issuance

- The applicant understands and will comply with applicable requirements of Hawaii Administrative Rules , Chapter 11-54.

- The Army Corps of Engineers has been contacted and since the Project does not involve work performed in, over, and under navigable waters of the United States, the Project will not require a Department of the Army Permit.

- The Project will require a National Pollutant Discharge Elimination System (NPDES) permit since the area of disturbance is anticipated to be greater than one acre of total land area. Applicable regulations related to NPDES requirements will be followed. We do not anticipate the need to obtain an NPDES permit for construction activity related to dewatering effluent discharge.

- The applicant understands that all discharges related to the Project construction must comply with the State's Water Quality Standards.

Monitoring / Enforcement

- The applicant understands and will comply with the monitoring requirements, if applicable, and further understands the enforcement and penalties that could occur.

Polluted Runoff Control Projects

- The applicant does not expect this Project to involve polluted runoff control as outlined in the State's Coastal Nonpoint Pollution Control Management Plan or Hawaii's Implementation Plan for Polluted Runoff Control.

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

Very truly yours,

Keith Kurahashi

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

TP3/12-459964R

May 22, 2012

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

Dear Mr. Kurahashi:

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

This provides additional comments to our letter of May 17, 2012.

Subsequent to the issuance of our letter, our Traffic Engineering Division (TED) had the following additional comments:

- On page 5, paragraph 4, it states that "...Walina Street approach has two lanes that serve all traffic movements." However, Walina Street serves only right-turn and left-turn movements. There is no through movement at this approach.

- In Table 4, page 29, at several locations, the projected level of service (LOS) during the weekday and Saturday afternoon peak hours in 2015 worsens. Mitigative measures should be included in the traffic management plan.

- Valet services should occur onsite and not on any City street.

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

cc: Urban Design Branch
Department of Planning and Permitting

DEPARTMENT OF TRANSPORTATION SERVICES

CITY AND COUNTY OF HONOLULU

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PETER B. CARLISLE
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

KAI NANI KRAUT, P.E.
DEPUTY DIRECTOR

TP3/12-459964R

May 17, 2012

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

Dear Mr. Kurahashi:

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

This responds to your letter of March 27, 2012, requesting our comments concerning this project.

We have no additional comments to those contained in our previous letter of January 11, 2012 (see attached).

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

Attachment

cc: Urban Design Branch, DPP w/att.

DEPARTMENT OF TRANSPORTATION SERVICES

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PETER B. CARLISLE
MAYOR

WAYNE Y. YOSHIOKA
DIRECTOR

KAI NANI KRAUT, P.E.
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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
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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

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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July 3, 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: Draft Environmental Impact Statement
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Yoshioka:

Thank you for your letters of May 17 and May 22, 2012 regarding the Draft Environmental Impact Statement (DEIS) 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 May 22 letter) and will revise the Draft Environmental Impact Statement (EIS) text consistent with the same.

1. On page 5, paragraph 4 of the Traffic Impact Report (TIR), the statement will be revised to note that there is no through movement at this intersection (Walina Street at Kuhio Avenue).

2. In Table 4, page 29 of the TIR, at several locations, the projected level of service (LOS) during the weekday and Saturday afternoon peak hours in 2015 worsens slightly but still remains acceptable LOS C or better. Our traffic consultant has reviewed the same and recommends no mitigative measures are required.

3. We acknowledge the concerns raised concerning the valet lane on Kuhio Avenue. We have been studying alternative designs and options for the same and intend to work to an ultimate solution which is satisfactory both to your department and the Department of Planning and Permitting.

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

Very truly yours,

Keith Kurahashi

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

2012/ED-5(js)

May 21, 2012

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

Dear Mr. Kurahashi:

Subject: Draft Environmental Impact Statement
International Market Place Revitalization Project
2290, 2318, 2324, 2330 and 2332 Kalakaua Avenue; and
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 Final Environmental Impact Statement (EIS) are comments on the above Draft EIS by the Department of Planning and Permitting (DPP).

Planning Division:

1. The main outstanding concern is the conflict between pedestrians crossing the Nahua Street/Kuhio Avenue intersection and vehicles in the valet lane on Kuhio Avenue. Not only does the proposed design lengthen the pedestrian crossing distance, there does not appear to be any design feature that would prevent vehicles in the valet lane from stopping in and obstructing the crosswalks. The low curb barrier also does not provide adequate space for pedestrians to wait for vehicles in the valet lane to clear the crossing area. Additional attention should be paid to the design of this area to improve the interface between pedestrians and vehicles and to avoid dangerous conflicts.

2. The discussion of the relevant policies in the General Plan should be expanded to include a discussion of consistency with Culture and Recreation, Objective A - To foster the multiethnic culture of Hawaii, Policy 1 - Encourage the preservation and enhancement of Hawaii's diverse cultures.

3. Consistency with the Primary Urban Center Development Plan has been adequately addressed in the Draft EIS by referencing appropriate statements in Sections 3.4.1.2 Visitor Industry (Pages 3-39), 3.5.1.4 Walking (Pages 3-52), and 3.5.1.5 Bicycles (Pages 3-56).

Traffic Review Branch:

1. A time line or phasing plan for the anticipated dates to obtain major building permits for demolition/construction work, including the dates for the occupancy of these buildings should be prepared by the Applicant. Dates for the submittal and approval of a construction management plan and traffic management plan should be incorporated into this time line.

2. The Traffic Impact Analysis Report (TIAR) should be expanded to include potential pedestrian impacts associated with this development. The recommendations contained in the TIAR should be site specific and include a diagram of the location of these recommendations. Updates to the TIAR may be required if there is a major change to the scope or timing of the major work items. A post TIAR will be required approximately nine months after the occupancy of the last major building to validate the traffic projections contained in the initial TIAR. If additional traffic mitigation measures are necessary to support unanticipated traffic impacts directly attributable to this development, the Applicant will be required to implement these measures.

3. The valet drop-off area should be relocated to Dukes Lane to minimize vehicular and pedestrian conflicts associated with this activity on Kuhio Avenue. The current TIAR should be revised accordingly.

4. Pedestrian connectivity to adjacent developments should be incorporated as an integral element in this project. In particular, internal walkways should be established between the proposed Princess Kaiulani Resort Complex (Princess Kaiulani) and this project.

5. Construction plans for all work within or affecting public streets should be submitted for review and approval. Traffic control plans during construction should also be submitted for review and approval, as required. Vehicular access points shall be constructed as standard City dropped driveways, unless the driveway is located at an existing signalized intersection. Adequate vehicular sight distance shall be provided and maintained at all driveways to pedestrians and other vehicles. Driveway grades shall not exceed five percent for a minimum distance of 25 feet from the property line. Entry gates and ticket dispensers should be recessed as far into the driveway as necessary to avoid any queuing onto public streets.

Civil Engineering Branch:

1. A permit will be required if dewatering effluent is discharged into the City's storm drainage system (Sections 2.7 and 7.7.1).

2. Due to the high water table, low impact development methods to address proposed revisions to the storm water quality requirements may not be feasible (Section 2.6).

Land Use Permits Division:

1. The proposed valet lane within the City right-of-way is dangerous and problematic. Valet drop-off and pick-up shall be conducted within the project site for the following reasons:

   - Valet movement perpendicular to the street will disrupt and impede pedestrian flow (parallel to the street).
   - There is no passing lane within the valet drop-off area. Delays within the drop-off lane must be anticipated.
   - Adequate areas and aisle space for wheelchair users are not provided.
   - All required yards shall be landscaped.
   - The drop-off lane will displace the public sidewalk.
   - Having the valet drop-off area along an area perceived to be the sidewalk will not contribute to a pleasant pedestrian experience.

2. Describe the valet drop-off physical barrier. Structures are generally not permitted in the public right-of-way. As shown, the barrier will obstruct the crosswalk.

3. There are conflicts with the valet drop-off areas and landscaping. For example, a large canopy tree and plantings are proposed in the main "valet drop-off" area at the "T" intersection with Nahua Street. Planters with coconut palms and groundcover are proposed along the designated valet drop-off areas along the entire Kuhio Avenue frontage.

4. Provide an illustration of the alternative valet drop-off design that would have the valet occurring only on private property and no sidewalk easement, as described in Item 9 of your response (dated March 6, 2012) to the DPP.

5. Show the 20-foot front yards (on Kalakaua and Kuhio Avenues) on the ground level plan. All required yards shall be landscaped and may be averaged. If a pedestrian easement is proposed to be located within the required yard, an equivalent or greater area of landscaping shall be provided adjacent to (behind) the required yard. The design of the easement and landscaping shall be reviewed for approval.

6. Pursuant to Section 21-9.80(4)(c)(8)(B) of the Land Use Ordinance, building facades at the ground level along open spaces and Kalakaua and Kuhio Avenues shall be devoted to open lobbies, arcade entrances, display windows, and to outdoor dining where it is permitted. There shall be an increase in these elements along Kuhio Avenue.

7. The Waikiki Special District Design Guidelines encourage the provision of useable, landscaped open spaces. These spaces should provide public focus and create places for social interaction. To maximize community benefit and enjoyment of these spaces, they should be integrated with and complement landscaped open spaces with the adjoining lots.

There is an exceptional opportunity to plan and provide visual and/or physical links to outdoor open spaces on the adjacent Princess Kaiulani site, which is also being redeveloped. Thoughtful planning and coordination could easily benefit both projects and provide a pleasant pedestrian experience. Further, the coordination should be facilitated since both Applicants [Kyo-ya Hotels & Resorts, LP (Princess Kaiulani) and TRG IMP, LLC] have employed the same architectural firm and agent.

8. Our understanding is that there will be outdoor dining within the required yard (Section 7.6.2.7), but it is not shown on the project.

9. The Kalakaua Avenue and Kuhio Avenue building elevations (without the existing building overlay) have not been provided.

10. Please note that the applications to be submitted for the various land use permits must include the necessary and appropriate application materials, not just a copy of the Final EIS.

Thank you for the opportunity to review and comment on the subject Draft EIS. Please contact Joyce Shoji of our Urban Design Branch at 768-8032 if you have any questions.

Very truly yours,

David K. Tanoue, Director
Department of Planning and Permitting

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

Doc. 936896

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

July 3, 2012

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

Subject: Draft Environmental Impact Statement
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 May 21, 2012 regarding the Draft Environmental Impact Statement 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 Final Environmental Impact Statement (FEIS) text consistent with the same:

Planning Division:

1. We acknowledge all of the concerns you raise concerning the valet lane on Kuhio Avenue. We have been studying alternative designs and options for the same and intend to work to an ultimate solution which addresses these concerns and which is satisfactory both to you and the Department of Transportation Services (DTS).

2. The FEIS will include a discussion of the Project's consistency with Culture and Recreation, Objective A - To foster the multiethnic culture of Hawaii, Policy 1 - Encourage the preservation and enhancement of Hawaii's diverse cultures.

3. We appreciate your recognition that the Primary Urban Center Development Plan has been adequately addressed in the DEIS.

Traffic Review Branch:

Based on discussions with the Traffic Review Branch, we offer the following responses:

1. A time line or phasing plan for the anticipated dates to obtain major building permits for demolition/construction work, including the estimated dates for the occupancy of these buildings, will be prepared by the applicant and submitted with the Waikiki Special District permit application. Dates for the submittal and approval of a construction management plan and traffic management plan will be incorporated into this time line.

2. The Traffic Impact Report (TIR) will be expanded to include potential pedestrian impacts associated with this development. Recommendations in the TIR will be site specific and include a diagram of the location of these recommendations. This expanded TIR will be included in the Waikiki Special District permit application.

   The applicant understands that updates to the TIR may be required if there is a major change in the scope or timing of the major work items and that a post TIR will be required approximately nine months after the occupancy of the last major building to validate the traffic projections contained in the initial TIR. The applicant further understands that if additional traffic mitigation measures are necessary to support unanticipated traffic impacts directly attributable to this development, the applicant will be required to implement these measures.

3. We have been studying alternative designs and options for the valet drop-off area currently shown along Kuhio and intend to work to an ultimate solution which addresses these concerns and which is satisfactory both to DPP and DTS.

4. We will look for opportunities to integrate with planned developments, particularly the proposed Princess Kaiulani Resort Complex should it proceed on a timeline consistent with the Project's development. We have already explored with Kyo-ya Hotels & Resorts, LP the possibility of a joint internal access way connecting the Princess Kaiulani's lobby to the upper level of the Project and will continue to work toward the same. We will provide a location within our project for a direct connection to the Princess Kaiulani Resort Complex.

5. Construction plans for all work within or affecting public streets will be submitted to the City for review and approval. Traffic control plans during construction will also be submitted to the City for review and approval, as required. Vehicular access points will be constructed as standard City dropped driveways, unless the driveway is at an existing signalized intersection. Adequate vehicular site distance will be provided and maintained at all driveways to pedestrians and other vehicles. Driveway grades will not exceed five percent for a minimum distance of 25 feet from the property line. Entry gates and ticket dispensers will be recessed as far into the driveway as necessary to avoid any queuing onto any public streets.

<u>Civil Engineering Branch:</u>

1. The applicant understands a permit will be required if dewatering effluent is proposed for discharge into the City's storm drainage system.

2. The applicant understands that low impact development methods to address proposed revisions to the storm water quality requirements may not be feasible due to the high water table.

Land Use Permits Division:

1. We acknowledge all of the concerns raised concerning the valet lane on Kuhio Avenue. We have been studying alternative designs and options for the same and intend to work to an ultimate solution which addresses these concerns and which is satisfactory both to DPP and DTS.

2. Please see Paragraph #1 above. The valet drop-off physical barrier is a low curb intended to prevent vehicles in the passenger loading/turn lane from merging into east bound traffic at the intersection or crosswalks. Should a valet drop-off lane be approved, we will assure that the physical barrier does not obstruct any crosswalk. The same could also be made wide enough to act as a pedestrian refuge if required and we will consider a landscape/greenscape/artscape island for this area.

3. Please see Paragraph #1 above. Should a valet drop-off lane be approved, we will assure that conflict with landscaping will be appropriately eliminated.

4. Please see Paragraph #1 above. We do not currently have a satisfactory design option which can accommodate a valet drop off along Kuhio entirely on private property and without a sidewalk easement. We are exploring alternatives and continue to believe a valet drop-off along Kuhio which can accommodate shuttles will be beneficial to the overall operation of the Project.

5. The FEIS will provide a site plan showing a 20-foot front yard setback line. However, the applicant will be using yard averaging (average 20-foot front yard). The applicant understands that required yards, except for necessary access drives and walkways, shall be landscaped. The applicant understands that any proposed pedestrian easement and landscaping will be subject to review and approval by DPP.

6. The applicant will provide an increase in open air commercial lobbies, arcade entrances and/or display windows within the building facades at the ground level along Kuhio Avenue.

7. The landscaped open spaces will be designed to provide a focus on the public and create places for social interaction. The landscaped open spaces will be integrated with and complement landscaped open spaces of the adjoining lots, in particular with the proposed Princess Kaiulani Resort Complex along Kalakaua Avenue. We agree that having the same architectural firm involved with both projects has and will facilitate coordination between the projects.

8. We apologize for the typographical error, it should have read "Outdoor dining facilities are **not** proposed within required yards." This will be corrected in the FEIS.

9. The Kalakaua Avenue and Kuhio Avenue building elevations without the existing building overlay will be provided in the FEIS.

10. The applicant understands that the applications for the various land use permits must include the necessary and appropriate application materials and not just a copy of the FEIS.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 17, 2012

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

via email: kkurahashi@hawaii.rr.com

Dear Mr. Kurahashi:

SUBJECT: International Market Place Revitalization Project, Draft EIS

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from (1) Land Division – Oahu District; and (2) Engineering Division, on the subject matter. No other comments were received as of our suspense date. The State Historic Preservation Division may be responding to you separately. Should you have any questions, please feel free to call Supervising Land Agent Steve Molmen at 587-0439. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
c: Department of Planning and Permitting
Attn: Urban Design Branch

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 27, 2012

Dear Participant:

CHAPTER 343, HRS
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Project:	International Market Place Revitalization Project
Owner:	Queen Emma Land Company
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 Keys:	2-6-22: 36, 37, 38, 39 and 43
Request:	Special District Permit, Major
Proposal:	The demolition of all buildings and structures on the project site and construction of a new retail, dining and entertainment center (about 390,000 square feet of commercial space).

Enclosed for your review and comment is a Draft Environmental Impact Statement (EIS) prepared for the above referenced project. Please submit any comments regarding the proposal's environmental impacts to our office, Kusao & Kurahashi, Inc., with a copy to the Department of Planning and Permitting (DPP) at 650 So. King Street, 7th Floor, Honolulu, Hawaii 96813 (Attention: Urban Design Branch). Comments must be received by **May 23, 2012**.

Following completion of the EIS phase, the DPP will process a Major Special District Permit (SDP). The SDP process will include a public hearing.

Should you have questions, or require a hard copy of the Draft EIS (if you received a copy on disc), please contact me at (808) 988-2231.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 4, 2012

MEMORANDUM

TO: **DLNR Agencies:**
__Div. of Aquatic Resources
__Div. of Boating & Ocean Recreation
X Engineering Division
__Div. of Forestry & Wildlife
__Div. of State Parks
__Commission on Water Resource Management
__Office of Conservation & Coastal Lands
X Land Division – Oahu District
X Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: International Market Place Revitalization Project, Draft EIS
LOCATION: 2290, 2318, 2324, 2330 and 2332 Kalakaua Avenue
2301 and 2345 Kuhio Avenue, Waikiki
TMKs: (1) 2-6-022: 036, 037, 038, 039 and 043
APPLICANT: Kusao & Kurahashi, Inc. for TRG IMP LLC; Owner: Queen Emma Land Company

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document. Please submit any comments by May 16, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

( ) We have no objections.
(✓) We have no comments.
( ) Comments are attached.

Signed: _____
Date: 4/9/2012

cc: Central Files

NEIL ABERCROMBIE
GOVERNOR OF HAWAII

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 4, 2012

RECEIVED
LAND DIVISION
2012 MAY 16 A 9:50
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

'12 APR 10 AM 09:00 ENGINEERING

MEMORANDUM

TO: **DLNR Agencies:**
__Div. of Aquatic Resources
__Div. of Boating & Ocean Recreation
X Engineering Division
__Div. of Forestry & Wildlife
__Div. of State Parks
__Commission on Water Resource Management
__Office of Conservation & Coastal Lands
X Land Division – Oahu District
X Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: International Market Place Revitalization Project, Draft EIS
LOCATION: 2290, 2318, 2324, 2330 and 2332 Kalakaua Avenue
2301 and 2345 Kuhio Avenue, Waikiki
TMKs: (1) 2-6-022: 036, 037, 038, 039 and 043
APPLICANT: Kusao & Kurahashi, Inc. for TRG IMP LLC; Owner: Queen Emma Land Company

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document. Please submit any comments by May 16, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

( ) We have no objections.
( ) We have no comments.
(x) Comments are attached.

Signed: _____
Date: 5/16/12

cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/SteveMolmen
Ref: DEISInternationalMarketPlaceRevitalization
Oahu.890

COMMENTS

(X) **We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones XS and AE. The National Flood Insurance Program does not have any regulations for developments within Zone XS however, it does regulate developments within Zone AE as indicated in bold letters below.**

( ) Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone.

( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ___.

(X) **Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.**

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

(X) **Mr. Mario Siu Li at (808) 768-8098 or Ms. Ardis Shaw-Kim at (808) 768-8296 of the City and County of Honolulu, Department of Planning and Permitting.**

( ) Mr. Frank DeMarco at (808) 961-8042 of the County of Hawaii, Department of Public Works.

( ) Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.

( ) Ms. Wynne Ushigome at (808) 241-4980 of the County of Kauai, Department of Public Works.

( ) The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.

( ) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

( ) Additional Comments: _____

( ) Other: _____

Should you have any questions, please call Ms. Suzie Agraan of the Planning Branch at 587-0258.

Signed: _____
CARTY S. CHANG, CHIEF ENGINEER

Date: 5/15/12

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

July 3, 2012

Mr. Russell Y. Tsuji, Land Administrator
Department of Land and Natural Resources
Land Division
P.O. Box 621
Honolulu, Hawaii 96809

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

Dear Mr. Tsuji:

Thank you for your letter of May 17, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate that your Land Division has no comments to offer and in response to your Engineering Division comments, the applicant will ensure that the Project complies with the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), as required. The applicant will contact Mr. Mario Siu-Li or Ms. Ardis Shaw-Kim at the Department of Planning and Permitting (DPP) should there be any questions regarding the local flood ordinance.

The applicant further understands that the State Historic Preservation Division may be responding to the applicant separately.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

May 16, 2012

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

Aloha Mr. Kurahashi:

Thank you for your letter dated March 27, 2012 regarding the review of the Draft Environmental Impact Statement for the International Market Place Revitalization Project located in Waikiki, Hawaii.

The Department of Hawaiian Home Lands is the State of Hawaii's largest affordable housing developer serving the needs of native Hawaiians pursuant to the Hawaiian Homes Commission Act, 1920, as amended.

The Department has reviewed the Draft Environmental Impact Statement and anticipates that the project will not impact DHHL's statewide development program and therefore has no comments to add to the Draft Environmental Impact Statement.

Thank you for the opportunity to provide these comments. If you have any questions, please do not hesitate to contact me at (808) 620-9501 or the DHHL Planning Office staff, Bob Freitas at (808) 620-9484.

Me ke aloha,

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

CC: Department of Planning and Permitting

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

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

July 3, 2012

Mr. Albert "Alapaki" Nahale-a, Chairman
Hawaiian Homes Commission
Department of Hawaiian Homelands (DHHL)
P.O. Box 1879
Honolulu, Hawaii 96805

Subject: Draft Environmental Impact Statement
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 May 16, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate that your department anticipates that this Project will not impact DHHL's statewide development program and that you have no comments to offer.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

Wes Frysztacki

1551 Ala Wai Boulevard #3802; Honolulu, Hawaii 96815

Tuesday, May 7, 2012

TRG IMP, LLC
200 East Long Lake Road
Suite 300
Bloomfield Hills, MI 48304-2324

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

Department of Planning and Permitting
650 South Street
Honolulu, Hawaii 96822
Attention: Joyce Shoji

Subject: International Market Place DEIS

Dear Applicant, Consultant and Approving Agency,

The International Market Place Revitalization Project (Project) includes the demolition of all buildings and structures on the project site (about 499,000 square feet of commercial space) and construction of a new retail, dining and entertainment center (about 390,000 square feet of commercial space). You conclude "The Project is not anticipated to have a significant direct, indirect, secondary or cumulative impact on the surrounding area in terms of public services and the environment primarily because of the proposed net reduction in the total floor area for the combined properties." It is reasonable to make this conclusion based on the reduction in floor area. However, this is not the dominant Project component generating significant negative transportation impacts.

The 5.982-acre project site fronts Kalakaua and Kuhio Avenues and is mid-block between Kaiulani and Seaside Avenues in Waikiki. It contains the International Market Place (IMP), Waikiki Town Center and the Miramar at Waikiki hotel (Miramar). No replacement hotel is being proposed. The elimination of existing parking spaces used by the hotel's overnight guests is replaced by parking used by people making much shorter daytime visits.

The redeveloped commercial center will be generally three levels in height, however, the portion fronting Kuhio Avenue will have a seven-story structure consisting of two levels of retail on the Ewa side and three levels of retail on the Diamond Head side with five levels of parking above (the existing parking structures serving the IMP, Waikiki Town Center and Miramar are located on this portion of the site). The significant negative transportation impacts created by the access and egress movements of all of the vehicles using those parking spaces were not addressed by the DEIS.

The Project's 776 parking spaces are 495 parking spaces in excess of the 281 required under the Land Use Ordinance. Parking is being developed as a stand alone business not restricted to the Project's internal parking requirements. The 776-space parking facility, if filled to capacity as intended, will be catering to an auto-oriented clientele destined to locations other the Project. Drivers will be lured to the parking entrance with valet service conveniently located on Kuhio requiring the displacement of the existing sidewalk alignment.

The impacts of the vehicles entering and exiting the 776-space parking facility and the conflicts with pedestrian movements on Kuhio will be far greater than any of those stated in the DEIS and its supporting documents. The Traffic Impact Report only identified 32 additional vehicles leaving the Project along Duke's Lane and turning right onto Kuhio. These 32 additional vehicles would only fill 64 of the parking spaces in the 776-space parking facility using a typical 2-hour parking duration for the type of commercial enterprises specified by the Project.

The traditional conservative traffic engineering approach would have been to assume the parking facility is filled to capacity regardless of whether the parking demand were generated by the Project's own floor area or from neighboring establishments with less attractive parking accommodations. This would result in 388 additional vehicles in the peak hour exiting along Duke's Lane, not just 32.

The 388 vehicles would be conflicting with far more than the 810 pedestrians crossing on the mauka side of Kuhio along Duke's Lane in one hour. The 810 pedestrians was the existing conditions weekday PM peak hour traffic count shown in Figure 3 of the Traffic Analysis Report. Figure 9 depicts the same 810 pedestrians for "Year 2015 Weekday PM Peak Hour of Traffic with Project". The Project generates no additional pedestrians?

The Traffic Analysis Report needs to be redone. It should address all impacts of the over supply of 776 parking spaces, the peak hour vehicle volumes at all critical access and egress locations when the parking facility is at capacity, the increases in pedestrian movements at those locations where increased vehicles are in conflict with pedestrians, the status of Duke's Lane as a shared public right-of-way with pedestrians and the mitigations appropriate to maintain the current pedestrian and transit level of service along all streets serving the Project. Consideration should be given to grade separation of the vehicle and pedestrian conflict points, avoiding any connection to Duke's Lane if it's current shared pedestrian and vehicle right-of-way function is to be preserved and locating the parking valet function on site and not along Kuhio Avenue.

Sincerely,

Wes Frysztacki

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

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

July 3, 2012

Mr. Wes Frysztacki
1551 Ala Wai Boulevard, #3802
Honolulu, Hawaii 96815

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

Dear Mr. Frysztacki:

Thank you for your letter of May 7, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project). We appreciate your comments and have given them careful consideration.

We offer the following responses *using italics* (following the order set forth in your letter):

In the third paragraph on the first page, you state that "The significant negative transportation impacts created by the access and egress movements of all of the vehicles using those parking spaces were not addressed in the DEIS."

The DEIS includes in Appendix 4 a comprehensive Traffic Impact Report (Report) prepared by Wilson Okamoto Corporation, the purpose of which was to identify and assess the potential traffic impacts resulting from the proposed International Market Place revitalization project in Waikiki. The Report includes a detailed analysis and development of the trip generation characteristics for the Project. Please see Sections IV and V of the Report. As is standard practice for this kind of analysis, the focus is on the highest traffic volume times during the day or "peak hours" in order to identify the worst likely traffic conditions to be encountered. The Report studied both the weekday and Saturday peak hour conditions and compared the existing conditions as well as the conditions resulting from the proposed Project. The specific assumptions for vehicles entering and leaving the Project garages are included. The Report concludes that "traffic conditions with the proposed redevelopment are expected to remain similar to without project conditions", but does include a number of recommendations (including certain roadway and signalization improvements as well as a traffic management plan), all of which the applicant intends to implement as stated in the DEIS.

In the first paragraph on the second page, you state that the Project's 776 parking spaces are 495 spaces in excess of the 281 required under the Land Use Ordinance (LUO), that the parking is being developed as a stand-alone business not restricted to the Project's internal parking requirements, and will cater to auto-oriented clientele destined for locations other than the Project.

Please rest assured that we are not building or planning any portion of our parking structure as a stand-alone parking business. The parking we are providing is intended for our customers and is sized to meet our expected demand. We will work to encourage our shoppers and diners to use the same as well as discourage use by those destined elsewhere by implementing graduated parking rates and/or shopper validation programs, and make adjustments in pricing and validation as needed to ensure adequate parking is available for our customers.

We believe it critical to the long-term success of the Project that we provide parking that is adequate, safe, convenient and competitively-priced versus other shopping destinations in the area. 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.

In the second through fifth paragraphs on the second page, you note that the impacts of vehicles entering and exiting the 776-space parking facility and conflicts with pedestrians will be far greater that those stated in the DEIS and ask for a more conservative approach in determining trips generated and pedestrians movements.

There are two concerns being raised and we take both seriously. The safety of pedestrians and disruption of pedestrian flow along Kuhio Avenue is of paramount concern to us. We have carefully planned the Project to assure pedestrian safety and minimize conflicts and disruptions. We believe the Project improves the overall pedestrian experience along this section of Kuhio by

reducing the vehicle and pedestrian conflict at the unsignalized exitway which serves the Waikiki Wave and the existing garage, widening the sidewalk areas along the full frontage of the Project, and proposing a valet solution intended to minimize vehicle crossing of pedestrian sidewalk areas. The primary access into and out of the Project's new garage was intentionally designed to line up with the signalized and cross-walked Walina Street intersection and away from Duke's Lane (which is intended to be one-way exiting for valet return only and explains the low usage assumption). These are solutions which will improve the pedestrian experience at all hours of each day, and not just the peak hours studied in the Report.

The second concern is that the Report was prepared appropriately and conservatively. We are keenly attuned to assuring the traffic study is professionally and competently prepared. Wilson Okamoto is one of the premiere traffic engineering firms in all Hawaii. They prepared the Report applying conservative assumptions and employing trip generation models developed and sanctioned by the highly-respected Institute of Traffic Engineers (ITE). Your suggestion that they inflate the vehicle count to assume the deck is at full capacity during the peak period is neither standard traffic engineering practice nor consistent with ITE modeling. That being said, we appreciate your strong focus on what is the paramount concern – pedestrian safety.

In fifth paragraph on the second page, you also ask that we consider various options which all appear intended to minimize pedestrian conflicts where possible.

As stated above, we believe the Project improves the overall pedestrian experience along this section of Kuhio. We are cognizant of your concerns about Duke's Lane and will design the Project to ensure the safety of pedestrians at all times. We should note, however, that Dukes Lane is a private easement and not a shared public right-of-way. It is and will remain fully signalized with crosswalks at Kuhio Avenue and grade separation will not be required. The Project design also includes an improved pedestrian connection between Kuhio and Kalakaua Avenues which we believe many pedestrians will choose to use instead of Duke's Lane as they do today. Lastly, we will be working with both the Department of Transportation Services and the Department of Planning and Permitting on potential alternatives to the current valet proposal.

Thank you again for your comments. Your letter and this response will be included in the Final EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

BOARD OF WATER SUPPLY

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Manager and Chief Engineer

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Deputy Manager and Chief Engineer

April 23, 2012

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

Dear Mr. Kurahashi:

Subject: Your Letter Dated March 27, 2012 Requesting Comments on the Draft Environmental Impact Statement 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 subject document.

The comments in our letter dated January 10, 2012, which is included in the document, are still applicable.

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

Very truly yours,

SUSAN UYESUGI
Program Administrator
Customer Care Division

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

July 3, 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: Draft Environmental Impact Statement
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 April 23, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate the determination that your comments on the EIS Preparation Notice in a letter dated January 10, 2012 are still applicable.

Your letter, this response and the January 10, 2012 letter and our response to that letter will be included in the Final EIS.

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

BOARD OF WATER SUPPLY

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

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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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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

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

April 20, 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: Draft Environmental Impact Statement - International Market Place Revitalization Project

We appreciate the developer's upfront commitment to completing an EIS instead of a less-intensive EA. We are aware that there may not have been an automatic 'trigger' for an EIS under HRS Chapter 343, but that the developer decided to pursue an EIS nonetheless.

To date, the Waikiki Neighborhood Board has formally responded to the EISPN in December 2011 and has participated in a presentation of the proposed development at a regularly – scheduled Neighborhood Board meeting. Thank you for including the Waikiki Neighborhood Board in the review process. As previously noted, the legacy and contributions of the Queen Emma Land Company to the Hawaii community, cannot be underestimated.

Section 6.3, Page 44
This section outlines projects currently in the development queue or actively under construction. Ensure that the design of the new structure(s) will be architecturally harmonious with surrounding buildings (of merit) and with proposed new developments. Ensure that configurations and placement of your proposed building(s) are not incompatible with nearby structures (ie; visually integrated, graduated in scale) where your building(s) meets existing/proposed structures on contiguous properties. This is especially true along Kalakaua Avenue.

Ensure that you physically integrate your structure(s) with other planned developments as much as possible, such as providing joint internal access ways, joint parking areas, continuous green spaces, view corridors and visual connections.

Section 7.2.3, Page 52
In addition to implementing all of the strategies in this section, pursue a 'deconstruction' approach to removal of the existing buildings. Recycle as much construction and demolition waste as possible especially when removing the Miramar Hotel and associated buildings. A reduction of the waste/demolition stream should be a paramount goal in this high density, high use area of Waikiki.

Section 7.2.4, Page 53
The city is currently embarking on a long term project to rehabilitate sewer lines under Kuhio Avenue. Coordinate with the City to ensure your sewerage and other infrastructure to be buried in the Kuhio Avenue right-of-way, can be installed at the same time to the degree possible. This will result in the roadway being torn up once and not twice.

Section 7.3.1.2, Page 54
Waikiki is also currently in the process of completing a Circulator Study to compliment the rail system terminating at the Ala Moana Center. This study may propose transportation concepts and facilities that may impact your development especially at it relates to the valet turnout lane and access to the parking garage. Consult with the City to ensure your proposal will not be contrary to what is being proposed in the Circulator Study. For instance, improving LOS and facilitating more and faster-moving vehicles through the area, is counter to many of the traffic-calming/reduced vehicle traffic goals of the Circulator Study.

Section 7.5.2.3, Page 58
Hide or screen all utility installations that may be visible from any publicly-accessible or publicly visible area.

Section 7.5.2.3, Page 59
Avoid use of reflective materials in compliance with the Waikiki Special District Guidelines.

As it relates to buildings and facades ensure that the pedestrian experience along both Kalakaua and Kuhio Avenues is aesthetically-pleasing, is conducive to pleasant pedestrian flow and is continuous in nature.

Section 7.5.2.4, Page 60
Consider creating a landcape/greenscape/artscape island on the proposed 'barrier' between the turn-out lane and Kuhio Avenue.

Use only xeriscape, hardy, drought-tolerant, non-invasive landscaping and eliminate the need for a permanent irrigation system, altogether.

Section 7.5.3.2, Page 61
The amount of parking proposed for this facility has not been justified other than to claim it is needed to attract local driving residents. There appears to be ample, excess parking within the immediate area at other developments. The oversupply of parking and the provision of it at free or reduced rates is detrimental to our urban community for the numerous reasons enunciated in our EISPN comment letter of December 2011.

We are aware that the Honolulu parking code currently stipulates only parking minimums and does not currently mandate 'parking maximums' so the proposed development is not inconsistent with the zoning code. Regardless, we ask that the developer reconsider the proposed number of parking spaces and/or complete a study showing that this quantity of excess parking is actually needed based on the visitor mix anticipated.

Section 8.6.5, Page 81
The anticipated reduction in per capita water use by 38% is commendable. Ensure that you exhaust the full range of water saving features such as recycled water options, storm water recovery and the aforementioned xeriscape landscaping schemes to further reduce potable water use.

Section 8.6.8, Page 83
As already discussed, consider 'deconstruction' techniques for the removal of the existing structures to ensure a maximum amount of recycled/reused materials, a reduction in waste hauling from the site and less disruption to the neighborhood during the construction phase.

Section 8.6.13.1, Page 85
Your comprehensive discussion of LEED standards, goals and the pursuit of each in your development, is appreciated. The Board strongly encourages you to implement all practical efficiency goals to the project consistent with LEED or other industry criteria. We would also encourage you to apply for actual LEED certification as we believe the positive public relations benefits gained from official certification reflects positively on our community as a whole, and on the Queen Emma Land Company in particular.

Section 8.7.3.4, Page 90
Noise continues to be an increasing concern of our community. We understand that construction noise may exceed DOH standards and that it will be temporary in nature. Once operational, it will be contingent on the developer to ensure that the noise levels at the property line do not exceed those stipulated under current codes and that any complaints by the public are addressed quickly and professionally by the facility operators.

Development Drawings/Elevations
Ensure that the Kuhio Avenue façade of the parking decks have some type of solid-opaque architectural treatment which hides cars from street view, prevents harsh parking garage lighting from being viewed from the street or other buildings, and prevents car headlights from projecting outside the structure during car movements. Ideally, the parking deck would be covered in a façade which makes it appear to be a habitable structure and is complimentary to other buildings in the area.

The Waikiki Neighborhood Board welcomes infill renovations in our neighborhood, especially from organizations such as the Queen Emma Land Company. We look forward to this project coming to fruition and operating in a manner consistent with the policies, codes and guidelines applicable to the design and function of Waikiki.

Mahalo,

Jeff Merz AICP, LEED AP
Waikiki Neighborhood Development Review

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

July 3, 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: Draft Environmental Impact Statement
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Merz:

Thank you for your letter of April 20, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project). We value the input we have received from the Waikiki Neighborhood Board and acknowledge, as you do, the important legacy and contributions of the Queen Emma Land Company to the Hawaii community.

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

Section 6.3, Page 44

We have and will consider the design of existing and proposed structures of merit surrounding the Project to ensure that our design will be compatible and harmonious with the same, particularly those that share frontage on Kalakaua and Kuhio Avenues adjacent to the Project. For example, we are attempting to provide a compatible setback along Kalakaua Avenue that transitions to the depth of the setback for the proposed Sheraton Princess Kaiulani development and that matches the setback at Macy's within the Waikiki Beachcomber Hotel. Our proposed building heights along both Kalakaua and Kuhio Avenue should be very much in scale with adjoining developments.

We will also look for opportunities to integrate with planned developments as you suggest, particularly the proposed Sheraton Princess Kaiulani should it proceed on a timeline consistent with the Project's development. We have already explored the possibility of a joint internal access way connecting the Sheraton's lobby to the upper level of the Project and will continue to discuss opportunities for coordinated landscaping and shared access and parking.

Section 7.2.3, Page 52

We will investigate "deconstruction techniques" for the removal of existing structures. We support the recycling of construction waste generated by the demolition of structures on the Project site so long as it is practicable from a cost and schedule standpoint. The demolition contractor will be directed to contact and obtain proposals from various companies that offer services in recycling metals and other construction waste, and to the extent reasonably practicable, will direct their use of the same.

Section 7.2.4, Page 53

We will coordinate with the City regarding work in the right-of-way of Kuhio Avenue to see if the same can be performed in a manner with proposed City work to avoid tearing up the roadway more than once.

Section 7.3.1.2, Page 54

We will direct our traffic consultant to contact the City to determine how the Project may be affected by the Circulator Study recommendations as the study progresses. We intend to work collaboratively with the City to ensure the development is compatible with the same to the extent consistent with the desired customer experience appropriate for the Project.

Section 7.5.2.3, Page 58

We will appropriately screen utility installations (to the extent permitted by the affected utility company) to minimize visibility from publicly-accessible or publically-visible areas.

Section 7.5.2.3, Page 59

We will comply with the requirements of the Waikiki Special District Guidelines in relation to the use of reflective materials.

The Project will be designed with buildings and facades and provide landscaping along both Kalakaua and Kuhio Avenues which will enhance the pedestrian experience, be aesthetically-pleasing, and create a pleasant and continuous pedestrian flow.

Section 7.5.2.4, Page 60

The proposed barrier you reference is 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. We will consider a landscape/greenscape/artscape island for this area.

While we acknowledge your recommendation to use only xeriscape, hardy, drought-tolerant, non-invasive landscaping, we intend the landscaping for the Project to be an intricate part of the

overall design and experience and very much a part of creating a "Hawaiian Sense of Place" for the Project. We believe the Project landscape architect, Walters, Kimura, Motoda, Inc. will provide the best possible landscaping solution for the Project consistent with the intended design.

Section 7.5.3.2, Page 61

We have carefully considered your comments concerning the parking proposed and available parking within the vicinity of the Project. As we previously shared with you, our long experience in developing and operating shopping centers convinces us that to ensure the long-term success of this Project – which is vital to the mission of the Queen Emma Land Company – it is critical that we provide adequate, safe, convenient and competitively-price parking as well as sufficient parking to satisfy the likely demands of tenants occupying the Project. We remain strongly convinced that the parking we are providing – which is above the code requirement, but below expected shopping center parking demand – is correctly sized for this Project and an important key to its success.

Section 8.6.5, Page 81

We appreciate your comment and will consider additional water saving features for the Project. We understand that recycled water through the municipal system, however, is not available for the Project site.

Section 8.6.8, Page 83

As stated above, we will investigate "deconstruction techniques" for the removal of existing structures. We support the recycling of construction waste generated by the demolition of structures on the Project site so long as it is practicable from a cost and schedule standpoint. The demolition contractor will be directed to contact and obtain proposals from various companies that offer services in recycling metals and other construction waste, and to the extent reasonably practicable, will direct their use of the same.

Section 8.6.13.1, Page 85

Thank you for your supportive comments. We will do what we can to pursue all practical efficiency goals consistent with LEED or other industry criteria and intend for the Project to reflect positively on the community and Queen Emma, including certification if reasonably practicable for us to do so.

Section 8.7.3.4, Page 90

When operational, we will work to ensure that the noise levels at the property line do not exceed applicable code requirements. Any noise complaints from the public will be addressed quickly and professionally by the management team, and we will work collaboratively with the Waikiki Neighborhood Board should there be any recurring issues of concern.

Development Drawings/Elevations

The Kuhio Avenue façade of the parking deck will be designed with an architectural treatment which hides cars from street view, prevents harsh parking garage lighting from being viewed from the street or other buildings, and prevents car headlights from projecting outside the structure during car movements.

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 the design and function of Waikiki.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

Hawaiian Telcom

April 21, 2012

Kusao & Kurahashi, Inc.
Planning and Zoning Consultants
Manoa Market Place
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822
Attention: Mr. Keith Kurahashi

Dear Mr. Kurahashi:

Subject: **Draft Environmental Impact Statement**
International Market Place Revitalization Project
2290, 2318, 2324, 2330 and 2332 Kalakaua Avenue
2301 and 2345 Kuhio Avenue - Waikiki

Thank you for the opportunity to review and comment on the draft environmental impact statement for the subject project.

In response to your letter dated March 27, 2012, Hawaiian Telcom does not have any comments to offer at this time.

Please submit future correspondence to:

Jon Uyehara
Senior Manager – OSP Engineering
Network Engineering & Planning
P.O. Box 2200
Mail Code: HIA10
Honolulu, HI 96841

If you have any questions or require assistance in the future on this project, please call me at 546-7761.

Sincerely,

Les Loo
Network Engineer – OSP Engineering
Network Engineering & Planning

cc: File [Waikiki]

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

July 3, 2012

Mr. Les Loo
Network Engineer - OSP Engineering
Network Engineering and Planning
Hawaiian Telcom
P.O. Box 2200
Honolulu, Hawaii 96841

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

Dear Mr. Loo:

Thank you for your letter of April 21, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project) indicating that Hawaiian Telcom has no comments to offer at this time.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

NEIL ABERCROMBIE
GOVERNOR

DEAN H. SEKI
COMPTROLLER

JAN S. GOUVEIA
DEPUTY COMPTROLLER

STATE OF HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAI'I 96810-0119

APR 20 2012

(P)1078.2

Mr. Keith Kurahashi
Kusao & Kurahashi, Inc.
Planning and Zoning Consultants
Manoa Market Place
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Subject: Chapter 343, HRS
Draft Environmental Impact Statement
2290, 2318, 2324, 2330 and 2332 Kalakaua Avenue
2301, and 2345 Kuhio Avenue, Waikiki
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,

DEAN H. SEKI
State Comptroller

c: Urban Design Branch, Dept. of Planning and Permitting

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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July 3, 2012

Mr. Dean H. Seki, State 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: Draft Environmental Impact Statement
International Market Place Revitalization Project
Tax Map Key: 2-6-22: 36, 37, 38, 39 and 43

Dear Mr. Seki:

Thank you for your letter of April 20, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate that your department has determined that this Project does not impact any of your department's projects or existing facilities in the general area and that you have no comments to offer at this time.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

NEIL ABERCROMBIE
GOVERNOR

PATRICIA McMANAMAN
DIRECTOR

BARBARA A. YAMASHITA
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
Benefit, Employment & Support Services Division
820 Mililani Street, Suite 606
Honolulu, Hawaii 96813

April 18, 2012

Refer to 12:0196

Mr. Keith Kurahashi
Kusao & Kurahashi Inc.
Planning and Zoning Consultants
Manoa Market Place
2752 Woodlawn Drive, Suite 5-202
Honolulu, Hawaii 96822

Dear Mr. Kurahashi:

Thank you for your letter dated March 27, 2012, that requests the Department review the Draft Environmental Impact Statement (EIS) for the International Market Place Revitalization Project, located in Waikiki, Hawaii. The Director of the Department of Human Services (DHS) has forwarded your letter to me for a response.

After a review of the proposed project, we do not have any recommendations or concerns to approve the project. We, also, do not foresee any impact on any child care services in the community.

If you have any questions or need further information, please contact Ms. Kathy Ochikubo, Child Care Program Specialist, at 586-7058.

Sincerely,

Scott Nakasone
Assistant Division Administrator

c: Patricia McManaman, Director
DPP, Urban Design Branch

KUSAO & KURAHASHI, INC.
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July 3, 2012

Mr. Scott Nakasone
Assistant Division Administrator
Department of Human Services
Benefit, Employment & Support Services Division
820 Mililani Street, Suite 606
Honolulu, Hawaii 96813

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

Dear Mr. Nakasone:

Thank you for your letter of April 18, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate that your department does not have any recommendations or concerns to approve the Project or foresee an impact on child care services in the community.

Your letter and this response will be included in the Final 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.
DIRECTOR

CHRIS TAKASHIGE, P.E.
DEPUTY DIRECTOR

April 17, 2012

Mr. Keith Kurahashi
Kusao Kurahashi, Inc.
Manoa Market Place
2752 Woodlawn Drive, Siute 5-202
Honolulu, Hawaii

Dear Mr. Kurahashi:

Chapter 343, HRS
Draft Environmental Impact Statement

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

Should there be any questions, please contact me at 768-8480.

Sincerely,

Chris Takashige

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

LMKK:pg(459968)

KUSAO & KURAHASHI, INC.
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July 3, 2012

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

Subject: Draft Environmental Impact Statement
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 April 17, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project) indicating that your department has no comments.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

cc: Department of Planning and Permitting
Queen Emma Land Company
TRG 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 8.0803

April 16, 2012

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

Dear Mr. Kurahashi:

Subject: International Market Place Revitalization Project
Draft Environmental Impact Statement (DEIS)

The State Department of Transportation (DOT) previously commented on the EISPN in its letters STP 8.0720 dated January 23, 2012, and STP 8.0757 dated February 29, 2012 (see Appendix 14 of the DEIS), and now offers the following supplemental comments.

Given the nature and location of the project, DOT does not anticipate any significant impact to its transportation facilities. However, the applicant should be informed that a permit is required from DOT Highways Division to transport oversized and overweight equipment/loads within the State highways facilities.

DOT appreciates the opportunity to provide comments. If there are any questions, including the need to meet with DOT staff, please contact Mr. Garrett Smith of the DOT Statewide Transportation Planning Office at 831-7976.

Very truly yours,

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

c: Urban Design Branch, C&C Department of Planning & Permitting

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Planning and Zoning Consultants
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July 3, 2012

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

Subject: Draft Environmental Impact Statement
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 April 16, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project). We appreciate your comments and have taken them into careful consideration.

The applicant appreciates that, given the nature and location of the Project, you do not anticipate any significant impact to State transportation facilities. However, the applicant understands that a permit is required from your Highways Division to transport oversized and overweight equipment/loads within State highways facilities.

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

Very truly yours,

Keith Kurahashi

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

April 10, 2012

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

Dear Mr. Kurahashi:

This correspondence is in response to your request for comments to the Draft Environmental Impact Statement for the International Market Place Revitalization Project.

Project activities shall comply with the following Administrative Rules of the Department of Health:

- Chapter 11-46 Community Noise Control
- Chapter 11-501 Asbestos Requirements
- Chapter 11-503 Fees for Asbestos Removal & Certification
- Chapter 11-504 Asbestos Abatement Certification Program

Should you have any questions, please contact me at (808) 586-4701.

Sincerely,

Jeffrey M. Eckerd
Program Manager
Indoor and Radiological Health Branch

C: Department of Planning & Permitting, Urban Design Branch

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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July 3, 2012

Mr. Jeffrey M. Eckerd
Program Manager
Indoor and Radiological Health Branch
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

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

Dear Mr. Eckerd:

Thank you for your letter of April 10, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project). We appreciate your comments and offer the following in response:

The project will comply with applicable requirements of the following Administrative Rules of the Department of Health:

- Chapter 11-46 Community Noise Control
- Chapter 11-501 Asbestos Requirements
- Chapter 11-503 Fees for Asbestos Removal & Certification
- Chapter 11-504 Asbestos Abatement Certification Program

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

NEIL ABERCROMBIE
GOVERNOR

DWIGHT TAKAMINE
DIRECTOR

AUDREY HIDANO
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS
830 PUNCHBOWL STREET, ROOM 321
HONOLULU, HAWAII 96813
www.hawaii.gov/labor
Phone: (808) 586-8844/Fax: (808) 586-9099

April 4, 2012

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

Dear Mr. Kurahashi:

This is in response to your request for comments dated March 27, 2012 on the Draft Environmental Impact Statement for the International Market Place Revitalization Project located in Waikiki on the island of Oahu.

The Department of Labor and Industrial Relations has no comments, and we foresee no impact on our existing or proposed programs. Should you have any questions, please call me at (808) 586-8844.

Sincerely,

DWIGHT TAKAMINE
Director

c: Department of Planning and Permitting

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
MANOA MARKET PLACE
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HONOLULU, HAWAII 96822

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

July 3, 2012

Mr. Dwight Takamine, Director
Department of Labor and Industrial Relations
830 Punchbowl Street, Room 321
Honolulu, Hawaii 96813

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

Dear Mr. Takamine:

Thank you for your letter of April 4, 2012 regarding the Draft Environmental Impact Statement (DEIS) for the International Market Place Revitalization Project (Project).

We appreciate that your department has no comments and do not foresee an impact on your existing or proposed programs.

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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

12-057
Int.MarketPlace

April 3, 2012

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

Dear Mr. Kurahashi:

SUBJECT: International Market Place Revitalization Project
Queen Emma Land Company, TMK: 2-6-22: 36, 37, 38, 39 and 43

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter, dated March 27, 2012. Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. We strongly recommend that you review all of the Standard Comments on our website: www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this application should be adhered to.

The United States Environmental Protection Agency (EPA) provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: www.epa.gov/sustainability. The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me.

Sincerely,

Laura Leialoha Phillips McIntyre, AICP
Environmental Planning Office Manager
Environmental Health Administration
Department of Heath
919 Ala Moana Blvd., Ste. 312
Honolulu, Hawaii 96814
Phone: 586-4337
Fax: 586-4370
Email: laura.mcintyre@doh.hawaii.gov
Website: www.hawaii.gov/health/environmental

KUSAO & KURAHASHI, INC.
Planning and Zoning Consultants
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July 3, 2012

Ms. Laura Leialoha Phillips McIntyre, AICP
Environmental Planning Office Manager
Environmental Health Administration
Department of Health (DOH)
919 Ala Moana Blvd., Suite 312
Honolulu, Hawaii 96814

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

Dear Ms. Mc Intyre:

Thank you for your letter of April 3, 2012 regarding the Draft Environmental Impact Statement for the International Market Place Revitalization Project (Project). We appreciate that you have no specific comments at this time and we have reviewed the Standard Comments you referenced.

We offer the following in review of the Standard Comments specifically applicable to our proposal:

Hazard Evaluation & Emergency Response Office

1. Phase I Environmental Site Assessments were performed by AMEC Earth & Environmental, Inc. (AMEC) on the Project site. The applicant intends to follow the recommendations made by the DOH in its standard comments, and to comply with applicable sections of Chapter 128D, Environmental Response Law, HRS, and Title 11, Chapter 451 of the Hawaii Administrative rules (HAR) State Contingency Plan.

3. The Project site does not involve lands formerly used in the production of sugar cane.

4. The applicant will seek a "no further action" letter if necessary, prior to permit approval.

Clean Air Branch

1. Construction/Demolition Involving Asbestos.

   Since a portion of the proposed Project will involve renovation/demolition activities which will involve asbestos, the applicant will contact the Asbestos Abatement Office in the Noise, Radiation and Indoor Air Quality Branch.

2. Control of Fugitive Dust

   The applicant will prepare a dust control management plan and understands that the plan does not require DOH approval.

   Activities will comply with the provisions of HAR Section 11-60.1-33 on Fugitive Dust.

   The following measures will be considered as appropriate to control fugitive dust:

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

Clean Water Branch

1. The applicant understands and will comply with applicable requirements of HAR Chapter 11-554.

2. The Department of the Army has been contacted and since the Project does not involve work performed in, over, and under navigable waters of the United States, the Project will not require a Department of the Army Permit.

3. The Project will require a National Pollutant Discharge Elimination System (NPDES) permit since the area of disturbance is anticipated to be greater than one

acre of total land area. Applicable regulations related to NPDES requirements will be followed. We do not anticipate the need to obtain an NPDES permit for construction activity related to dewatering effluent discharge.

4. The applicant understands that all discharges related to the Project construction must comply with the State's Water Quality Standards.

5. The applicant understands and will comply with the monitoring requirements, if applicable and further understands the enforcement and penalties that could occur.

6. The applicant does not expect this Project to involve polluted runoff control as outlined in the State's Coastal Nonpoint Pollution Control Management Plan or Hawaii's Implementation Plan for Polluted Runoff Control.

Safe Drinking Water Branch

The Project does not involve development or actions affecting a public water system, except for a water line lateral (connection) for service off the municipal system. The Project does not involve an underground injection well, nor does it involve development of a Golf Course. Therefore, our understanding is that the standard comments standard comments of the Safe Drinking Water Branch are not applicable to the Project.

Solid and Hazardous Waste Branch

Hazardous Waste Program

The applicant does not anticipate the Project to involve the handling of hazardous waste. In the event any hazardous waste is involved in any aspect of the Project, the applicant will comply with the regulations set forth in Chapters 11-260 to 11-280(HAR.

Solid Waste Section

The Project will not involve the development of a solid waste disposal, recycling, reclamation or transfer system. The applicant may have a small on-site recycling program. As a generator of solid waste the applicant will ensure that all wastes are delivered to permitted solid waste management facilities.

Office of Solid Waste Management

The applicant will develop a solid waste management plan encouraging recycling and reuse of construction materials, including designated trash bins for recycling.

Underground Storage Tanks

The applicant is not currently aware of the need to close or remove any underground storage tanks in connection with the development of the Project, nor does the applicant plan to install an underground storage tank.

Wastewater Branch

The Project will be connected to the City's municipal sewer system. The applicant understands that the DOH Wastewater Branch has no comments to offer at this time. The applicant will explore the use of non-potable water in planting areas in an effort to further reduce wastewater and potable water demands.

Noise Radiation & Indoor Air Quality Branch Standard Comments

The Pproject will comply with applicable requirements of the following Administrative Rules of the Department of Health:

- Chapter 11-39 Air Conditioning and Ventilating
- Chapter 11-46 Community Noise Control
- Chapter 11-501 Asbestos Requirements
- Chapter 11-503 Fees for Asbestos Removal & Certification
- Chapter 11-504 Asbestos Abatement Certification Program

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

Very truly yours,

Keith Kurahashi

Keith Kurahashi

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